



**ALLERGEN  
MANAGEMENT:  
WHAT MORE CAN BE DONE IN  
THE HOSPITALITY INDUSTRY?  
STS FOOD SAFETY 2019/20**

Part of the **ELAS** group of companies





## Introduction

Around 11-26 million members of the European population are estimated to suffer from a food allergy\*, and it is therefore right that the European and UK governments should look to bring in laws and regulations to better protect those who suffer from food allergies. However, despite the legislation, there have been several high-profile fatal incidents over the last few years and allergens are still proving to be a challenge for food businesses when wanting to achieve compliance.

2019 saw STS Food Safety bring together an expert panel of food safety and operational professionals to discuss how allergens are currently affecting the hospitality industries. Topics discussed on the day included:

**Consumer responsibilities** - Are allergen sufferers aware of how best to protect themselves when it comes to eating out or ordering food?

**De-skilling our workforce** - We've hit a turnover rate of 70%, have we unknowingly de-skilled our workforce?

**Food hypersensitivities** - With more and more people each year being diagnosed with allergies or intolerances, is the hospitality industry equipped to deal with this increase?

**Supply chain weaknesses** - Is this supply chain unable to get real-time allergen data to the front line?

# Are Consumers Aware of Their Responsibilities?



A recent survey by the Food Standards Agency (FSA) in partnership with Allergy UK and the Anaphylaxis Campaign revealed that 41% of young people (16-24 years old) with food allergies or intolerances don't feel confident when asking staff members for allergen information. This confidence issue is also prevalent within front of house staff, with most of our panel reciting times where allergen sufferers have failed to declare their allergens. Unbelievably, one of our panel members had come across a family where when asked if their child had allergens, both parents gave different answers!

With this in mind, do people with allergies know the extent of their responsibilities when it comes to eating out or ordering food? And if they do not know their responsibilities, can we really blame the allergy sufferer for this lack of knowledge?

Are consumers aware that allergies and intolerances can evolve and become more serious over time? An allergic reaction that once resulted in a harmless rash could unfortunately lead to an anaphylaxis reaction years later.

This scenario is evident in a recent high-profile case involving the successful prosecution of a takeaway called Royal Spice by Hyndburn Borough Council, Lancashire Police and Lancashire County Council.

A customer ordered food through Royal Spice and unknowingly ate peanuts. This was after declaring their allergy information on the online order system. Unfortunately, the consequences were fatal.



“  
41% of young people (16-24 years old) with food allergies or intolerances don't feel confident when asking staff members for allergen information.”

The hospitality industry - and even allergen sufferers - need to take serious note that no matter how mild an allergic reaction may appear; it should always be treated with the up-most seriousness and care. Otherwise, the consequences can be fatal.

Additionally, allergen laws are complicated, and it doesn't help that the media often oversimplifies complex legislation (including an allergen sufferer's responsibilities) meaning we aren't as educated as we ought to be.

There have been numerous complaints from consumers ever since the Food Information To Consumers (EU FIC) Regulation came in to force in 2014. Consumers were expecting to see clear allergen information and ingredients lists printed on signs or menus but instead many businesses have taken the choice to give this information verbally.

The government have announced that they will introduce new allergen laws by the summer of 2021 in order to make information clearer for both allergen sufferers and the hospitality industry. However, it is widely agreed that any new laws need to be supported by simple best practice guidance that leaves no room for misinterpretation. This is where the 2014 regulations were at a disadvantage. The corresponding guidance and support was too little too late.

It would also be worthwhile for the government to combine the best practice guidance with a consumer campaign, similar to the recent Easy To Ask initiative introduced by the FSA, Allergy UK and Anaphylaxis UK. Opening and encouraging communication between the food industry and consumers is only going to help minimise the risk when it comes to allergens.

*“ No matter how mild an allergic reaction may appear; it should always be treated with the up-most seriousness and care ”*



# Are We De-skilling Our Workforce?



With a workforce estimated at 1.75m people and with a staff turnover of approximately 70%, there is no denying that these are scary figures. High staff turnover brings extra pressure to businesses including having to find replacement staff urgently – often for a business to survive. Are we de-skilling the quality of our recruits in order to plug staff shortages?

The law has been the same in this area for many years with ‘food business operators having to ensure that food handlers receive the appropriate supervision, instruction and training in food hygiene for the work they do’. The law was also slightly strengthened when the new EU FIC came into force in 2014 which specifically calls for business to provide allergen training to their staff.

On the outset, it can be deemed a positive move to tighten the law around allergens and staff training. However, does this mean that the previous definition wasn’t clear enough to begin with?

Large hospitality brands have invested millions into allergen and food safety training and many smaller independent businesses have also invested into their team. But mixing a 70% staff turnover with the complexities around allergens means food businesses can never be 100% certain that their training has been as effective as it could be. Whilst larger businesses have the financial benefit of tendering for training providers, smaller businesses may have their hands tied financially, meaning they are forced to go down the cheapest or easiest route, resulting in poor training.

One of the best ways of checking if you are inadvertently de-skilling your workforce is through auditing, mystery shoppers, EHO inspections and compliance data. All these methods are incredibly common, and arguably textbook, within large hospitality businesses. But again, for smaller businesses, these methods tend to be ‘nice to haves’, meaning the only way they know their team’s competencies is through EHO inspections and often if there is an issue it is too late to rectify.



Operations managers are tasked with streamlining a business's processes in order to increase efficiency and profits. Businesses want their new recruits to hit the decks as fast as they can, however, when it comes to food hypersensitivities there are always new and complex challenges that need to be addressed. These challenges need to be discussed and taught in detail, regardless of whether there are staff shortages or language barriers. Employee inductions should last several days in order to be sure that new recruits have soaked up as much knowledge as possible. If new recruits haven't undergone the relevant training, including food safety and allergen awareness, then they shouldn't be allowed on the floor.

It's not only front of house staff who are at risk of being de-skilled. What about senior head office staff members or business owners? They may not handle food, but they certainly need to understand allergens and their importance. Learning often trickles down from senior members of staff to the rest of the company. If a business owner demonstrates that they are fully knowledgeable and competent when it comes to allergens it means that there is a greater chance that allergens are taken seriously within the company culture.

Employees can be personally fined due to poor allergen management. A recent example of this involved an employee attempting to cover up an allergy mistake that was put through their point of sale (POS) system. When the dish came out and the employee realised their mistake, instead of calling it back and issuing the correct allergen free food, they amended the order in the POS instead.



This is an important example of how we may be deskilling our workforce. The company's systems were not at fault as they had the correct allergen management procedures and control measures in place. Instead, it shows that the employee made a series of mistakes with little regard and understanding of the consequences of not only serving an allergenic dish to a consumer, but also the implications it can have on them self.

It's widely accepted that there are different learning styles (visual, auditory, reading/writing and kinaesthetic) and this needs to be brought into consideration when training the hospitality industry. For training to be truly effective, it can't be seen as being a one size fits all approach, however most often, it is. Having a wide variety of training options available for your team can make training more accessible for learners as well as sparking a desire within them to learn more.

# Food Hypersensitivities: Can the hospitality industry handle the rise?



Food hypersensitivities are on the rise and the FSA's latest Wave report in September 2019 indicated that 21% of UK consumers now have a food intolerance, followed by 5% who have a food allergy. Can the hospitality industry handle this increase in food hypersensitivities?

It is currently predicted that by 2025, 50% of the EU population will be affected by some form of allergy, with a large portion of this percentage being a food allergy\*\*. This means that customers will be expecting their needs to be met by the hospitality industry – and rightly so. Allergy UK suggest that if there is a group of diners and one has a food allergy; the group are more likely to pick a restaurant that suits the one person with the allergy. This shows how seriously everyone is taking allergens and the hospitality industry needs to follow suit.

Whilst the current allergen regulations only dictate the 14 common European food allergens (celery, cereals containing gluten, crustaceans, eggs, fish, lupin, milk, molluscs, mustard, tree nuts, peanuts, sesame seeds, soybeans and sulphur dioxide/sulphites), we are seeing a sharp rise in emerging allergens such as kiwi and tomato. However, because current allergen training and legislation focuses only on the 14 allergens, will the hospitality industry take a tomato allergy as serious as they would a peanut allergy?

As the list of emerging allergens is only going to increase, food businesses need to ensure they take every allergen as seriously as possible.

Food businesses should start to consider allergen training that goes above and beyond the current requirements. Additionally, some food businesses may want to introduce training that focuses on their own dishes and cooking practices to ensure that their front of house staff fully understand what goes on back of house and are able to convey allergen information with confidence.

There have been numerous cases where the media have vilified food businesses for claiming that they can't 100% confirm the absence of allergens from any of their dishes. The industry seems to be split when it comes to deciding if this is a suitable thing to say. On the one hand, workers should be able to confidently recite what dishes have allergens and which don't. Yet with even the most stringent of controls in place, can you ever guarantee that a food item is free of allergens? Ultimately it's the food business's responsibility to place safe food on the market.

# Food Supply Chain Weaknesses



The food supply chain in the UK has a wholesale market valued at £7,202m and it is still growing year on year. This is fantastic for the hospitality industry as it means they have a wider choice than ever before. However, it does pose serious questions about how quickly suppliers can get their allergen information to their buyers' front line.

Anyone signed up to the FSA's allergy alerts can tell you how many products are recalled monthly because of cross contamination or un-declared allergens in the products. The only way to accurately know if something has been re-called is if your business takes the time to monitor and check the FSA's alerts against your own products.

Larger food businesses often place a contractual obligation on suppliers to notify them directly of any product recalls or allergen notifications. But even with this control measure, it is often a struggle for the food business to get the message out to their stores in a timely, effective manner.

When it comes to smaller businesses they often buy from cash and carry's or small scale suppliers. When using these, food businesses have little chance of becoming aware that the labels on their products aren't always accurate, in turn, resulting in devastating consequences for not only the customer but also the food business.

An extract from the Federation of UK Food and Drink Wholesaling (FWD) states 'businesses will have to demonstrate greater accountability across the entirety of their supply chains to provide assurances on food hygiene, ethics and sustainability standards as consumer demand for real-time information grows. Sustainability, provenance and health are now key issues for shoppers. The whole food supply chain needs to be more visible so people can reconnect with where their food comes from'.

Blockchain seems to be the most promising solution to this need currently. The FSA have also acknowledged the importance of Blockchain and have trialed it at a slaughterhouse back in 2018 (although not much else has been mentioned since the trial). Following suit, leading companies such as Carrefour in France, were the first in Europe to have scannable QR on certain products such as chicken and milk, allowing customers to see where their food comes from. This technology can also be used throughout the supply chain, with each part of the supply chain being able to add their own allergen information. This will then provide as much allergen information to the consumer as possible.

However, this technology is a long way from becoming widespread and it is yet to be tested in the eating out sector.





## Executive Summary

It's clear that allergens need to remain a top priority within the hospitality industry and that simply relying on compliance with the law may not be enough to ensure the safety of customers.

While it is yet to be seen if the new regulations that the UK Government are proposing for 2021 will increase customer safety, going above and beyond and introducing further due-diligence measures when it comes to allergen management will only work in the hospitality industry's favour.

Below is a list of top tips, derived from our expert panel, that will help ensure businesses excel when it comes to allergen management:

- Ensure allergens are talked about regularly at the very top of your business, whether it be a business owner or senior team. If employees know allergens are important to the bosses, allergens are more likely to be important to them too.
- Explain to employees that targets linked to how they perform when it comes to allergen management will affect their performance review, and even bonuses.
- Take into consideration that everyone learns differently and ensure there are various options available to get the most out of your team.
- Stress test your allergen procedures regularly. EHO's will only inspect when there is an incident or when your business is due for a re-score, but you can call them and ask for support. The private sector in food safety is also thriving at the moment with multiple respectable companies offering multiple support packages for both large and small businesses.
- Tracking allergen complaints and near misses can you help you identify individual stores or employees where training hasn't been effective.
- Ensure that you have clear procedures agreed with your suppliers on how they inform you of product recalls and contamination issues. Most importantly, be sure you can trust the traceability of your supply chains.
- Cross contamination is one of the leading causes of allergen incidents. Remember that allergens can't be killed, only cleaned away. Make sure your cleaning equipment is cleaned regularly, especially after coming into contact with an allergen.



## About the Panel

STS is proud to be working alongside a number of food safety experts from across the hospitality industry. We would like to acknowledge our gratitude to:

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STS Food Safety

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**Charlotte Radcliffe**

The Nutrition  
Consultant



STS Limited  
Charles House, Albert Street,  
Eccles, Manchester, M30 0PW

☎ 0845 862 8030    ✉ [sts-solutions.co.uk](mailto:sts-solutions.co.uk)

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