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Food Allergens and Compliance with Relevant Legislation Policy

Purpose

Elior UK and its operating brands are aware of the importance of ensuring that anyone involved in the storage and preparation or serving of food to our customers, understands the risks involved, how to avoid them and the importance of giving our customers accurate information with respect to food allergens. Elior UK is also aware of the requirement to comply with current and future legislation relating to food allergens.

The purpose of this policy is to ensure that, at site level, Elior UK are able to interact responsibly with our customers on a daily basis and fulfil our legal obligations.

Scope

Elior UK takes precautions in our catering operations to prevent the occurrence of allergic reactions by the inadvertent consumption of these products and to ensure all necessary steps are taken to ensure compliance with all relevant legislation including EU Regulation 1169/2011, and specifically, that allergen information for the 14 'Annex II' allergens for our food is available. Elior UK provides food and drink across a wide range of settings including bars, vending machines, hospitality and kiosks. All these areas also comply with storage and allergen identification policies, as laid out by Elior UK.

Responsibilities

Our ability to demonstrate fulfilment of our purpose, is measured through compliance with our food safety systems. This is monitored and measured by our internal safety team, independently audited by our external health and safety partner and supported by operational management.

Key attributes of our food safety systems related to allergens and provision of the allergen information to our customers includes:

- Suppliers provide specific information about the ingredients of prepared foods through detailed labelling descriptions. All suppliers must provide information on the presence or absence of the 14 Annex II allergens and ongoing updates for any product changes. This information is stored centrally in Elior UK's recipe management system 'Star-Chef';
- Chefs are trained to follow approved standard recipes containing ingredients that have allergen information stored within 'Star-Chef'. This enables the provision of accurate allergen information, to our customers, using Star Chef allergen reports. Additionally, all food handlers are trained that where Star Chef is not implemented the manual process detailed in section 6 of the Food Safety Policy must be adopted. Chefs confirm at pre-service briefings that dishes have been prepared exactly according to the recipe specification. If the recipe has not been followed exactly, for example in the event of an ingredient substitution, this must be communicated at the pre-service briefing and the allergen information amended accordingly to reflect any changes in the allergen content of the dish;
- Additional controls are provided to the non-IT sites where Star-Chef is not available. These controls are in line with the Elior UK Food Safety Policy. Primary Education sites follow the Medical Diet Policy that defines practice in the delivery of safe school meals for pupils with medical dietary requirements including food allergies;
- All food handlers receive training on food allergy, the risks involved and how to minimise these when storing and
 preparing food. All colleagues are trained on the correct procedure to follow when providing allergen information to
 our customers and have a pre-service briefing to ensure that correct procedures are followed and to communicate if
 there have been any changes to dishes prepared that may affect the allergen content;
- Chefs will be able to provide a list of ingredients for foods prepared on site at the request of our customers through the Star-Chef system or the manual process;
- Catering Managers will be able to provide information, through reference to Star-Chef, on the composition and allergen content of foods that are offered for sale, but which have not been prepared on the premises;
- All pre-packed for direct sale foods must be labelled in accordance with section 6 of Food Safety Manual.

Governance

Elior UK's food safety systems have been assessed by the Primary Authority Cheshire East, who have given assured advice on all policies and procedures within the policy

The Board of Directors at Elior UK review the food safety performance of the company on a monthly basis that is documented as part of the minutes. Food safety is also routinely considered in reviewing company strategy and business objectives. This policy is reviewed at least annually at Leadership Team level and will be revised in accordance with Elior UK's procedures and any changes in legislation.

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Catherine Roe Chief Executive, Elior UK 14 December 2021