1. Purpose
Newcastle University is committed to reducing the risk to members of the University community and visitors, with regard to the provision and preparation of food which could lead to an allergic reaction.

Newcastle University is not in a position to guarantee a completely allergen free environment. However, it is the purpose of this policy to minimise the risk of exposure, to allergens, to encourage self-responsibility through communication and access to allergen information and plan for effective response to possible emergencies.

2. What is covered by the policy?
Anybody can develop a food allergen or intolerance at any time in their life, irrespective of whether they have consumed the food previously. A person with an allergy is at risk even if they consume a small amount of the food allergen.

Food allergies affect the body’s immune system. The body reacts to certain allergens in food by producing antibodies which can cause immediate and sometimes severe symptoms, such as: itching or strange metallic taste in the mouth, swelling of the throat and tongue; difficulty in swallowing or speaking; abdominal cramps, nausea and vomiting; skin hives (nettle rash) anywhere on the body. In most extreme cases, difficulties in breathing and a severe fall in blood pressure (anaphylactic shock) can prove fatal.

Food intolerance does not involve the immune system in the same way and is not usually as severe as a food allergy. Symptoms usually take longer to appear and may include headaches, fatigue and digestive problems. Food intolerance is harder to diagnose than a food allergy. The person with a known allergen trigger may know what food ingredient will provoke a reaction. However, they may well have eaten this food or a specific dish previously and had no adverse reaction.
Coeliac disease is a lifelong autoimmune disease caused by a reaction to gluten. 1 in 100 people have the condition. Symptoms include bloating, diarrhoea, nausea, wind, constipation, tiredness, sudden or unexpected weight loss, hair loss and anaemia. Once diagnosed, it is treated by following a gluten free diet for life.

3. Who does the policy apply to?
Food allergies and intolerances are life-changing. In December 2014, the law on how allergen information is provided by food businesses changed, to make it easier when buying food, or eating out with an allergy or intolerance. This policy therefore applies to all Hospitality and Commercial Services colleagues.

4. Roles and responsibilities

- Head of Hospitality and Commercial Services to undertake an annual audit and support the resolution of any non-compliance with allergen management procedures.
- Operations Manager for Retail and Operations Manager for Conferences and Events to ensure that all colleagues undertake Allergen awareness training, annually and to be aware of their role specific responsibilities.
- Development and Innovation Chef, is responsible for ensuring that any food provided for University colleagues or visitors with a food allergy is appropriate for their needs. To be responsible for duties as set out in the PPDS process.
- Health & Safety Officer, to offer support and guidance with regards the content of the policy and future amendments. To advise on a management system to ensure effective documentation of processes and training is in place.
- Procurement Office – to support the establishment of supplier contracts which best support allergen management practices. To assist in any contractual resolution of supplier non-compliance with regards allergen management concerns.
- Training Officer, to support and monitor the annual training programme.
- Food and Beverage Managers, Supervisors, Chef team, Front of House team - responsibilities as set out in the PPDS process, to be aware of how to respond to requests for information regarding allergens
- Conference team, to ensure that internal and external Event Planners are aware of their responsibilities towards guests, under this policy.
- Central Production Team, Stores Officer, Menu database Administrators - responsibilities as set out in the PPDS process.

5. Policy
This policy covers items made on site which are available for sale in retail units or provided for in-house events. Including, university retail, residential catering, event catering and central production. To provide food allergen information to staff, students and visitors at Newcastle University.

To provide clear guidance to all catering staff on their responsibilities for the provision of food to anyone using the catering facilities who may have a food allergy, food intolerance or coeliac disease.
To provide clear guidance to all catering staff on the process and their responsibilities with regards Pre-packaged food for Direct Sale (PPDS).

To ensure that relevant food allergy training and food hygiene training are provided for all catering staff.

This policy does not cover food consumed on Newcastle University campus, which was not provided by Newcastle University Hospitality and Commercial Services. Including, but not exclusively food provided by NUSU, external private catering companies, staff charity bake sales.

6. Related regulations, statutes and policies
From 13 December 2014, legislation (the EU Food Information for Consumer Regulation 1169/2011) requires food businesses to provide allergy information on food sold unpackaged. There are also changes to existing legislation on labelling allergenic ingredients in prepacked foods (UK Food Information Amendment, Pre-Packaged Food for Direct Sale October 2021).

7. Procedure to implement the policy
Please refer to Newcastle University’s Hazard Analysis Critical Control Point (HACCP) guidance and Newcastle University’s Pre-Packaged Food for Direct Sale (PPDS) guidance.

8. Monitoring and reporting on compliance

<table>
<thead>
<tr>
<th>What will be monitored?</th>
<th>Frequency</th>
<th>Method</th>
<th>Who by</th>
<th>Reported to</th>
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<tbody>
<tr>
<td>PPDS</td>
<td>Monthly</td>
<td>Spot check review of process</td>
<td>Stores Officer and Head Chef, Food &amp; Beverage Manager</td>
<td>Reported by exception to Operations Manager Retail and Operation Manager Conferencing and Events</td>
</tr>
<tr>
<td>Full lifecycle of allergen management</td>
<td>Annually</td>
<td>Audit</td>
<td>E&amp;F H&amp;S Officer and Head of HCS</td>
<td>Reported to Head of HCS and by exception to COO and Head of H&amp;S</td>
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</tbody>
</table>

9. Failure to comply
Failure to comply with the requirements of regulatory provisions, is a criminal offence and may result in a criminal prosecution being brought against the University.

A person convicted of an allergens offence under the FIR 2014 will be liable to an unlimited fine. The amount of the fine would be up to the Magistrates to decide on a case by case basis.
### Document control information

**Does this replace another policy?** Food Allergens Policy July 2021 (Department based policy)

### Approval

**Approved by:** Deputy Director Estates & Facilities Lynne Edis  
**Date:** March 2022

**Effective from:** January 2022

**Review due** – Annually or earlier as required, following amendments to regulations

### Responsibilities

**Executive sponsor:** Chief Operating Officer Adrienne McFarland

**Policy owner:** (This maybe an officer or Committee) Estates and Facilities Health and Safety Committee

**Person(s) responsible for compliance:** Head of Hospitality and Commercial Services Julia Taylor

### Consultation

<table>
<thead>
<tr>
<th>Version</th>
<th>Body consulted</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>January 2022</td>
<td>Internal Audit, Corporate Health and Safety</td>
<td>January 2022</td>
</tr>
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### Equality, Diversity and Inclusion Analysis:

Does the policy have the potential to impact on people in a different way because of their protected characteristics? **No**

If yes or unsure please consult the Diversity Team in HR for guidance

**Initial assessment by:** N/A  
**Date:** N/A

**Key changes made as a result of Equality, Diversity and Inclusion Analysis**

### Document location

\`\`campus\pss\HospitalityAndCommercialServices\Catering\Supervisor\Health&Safetyactionplan`