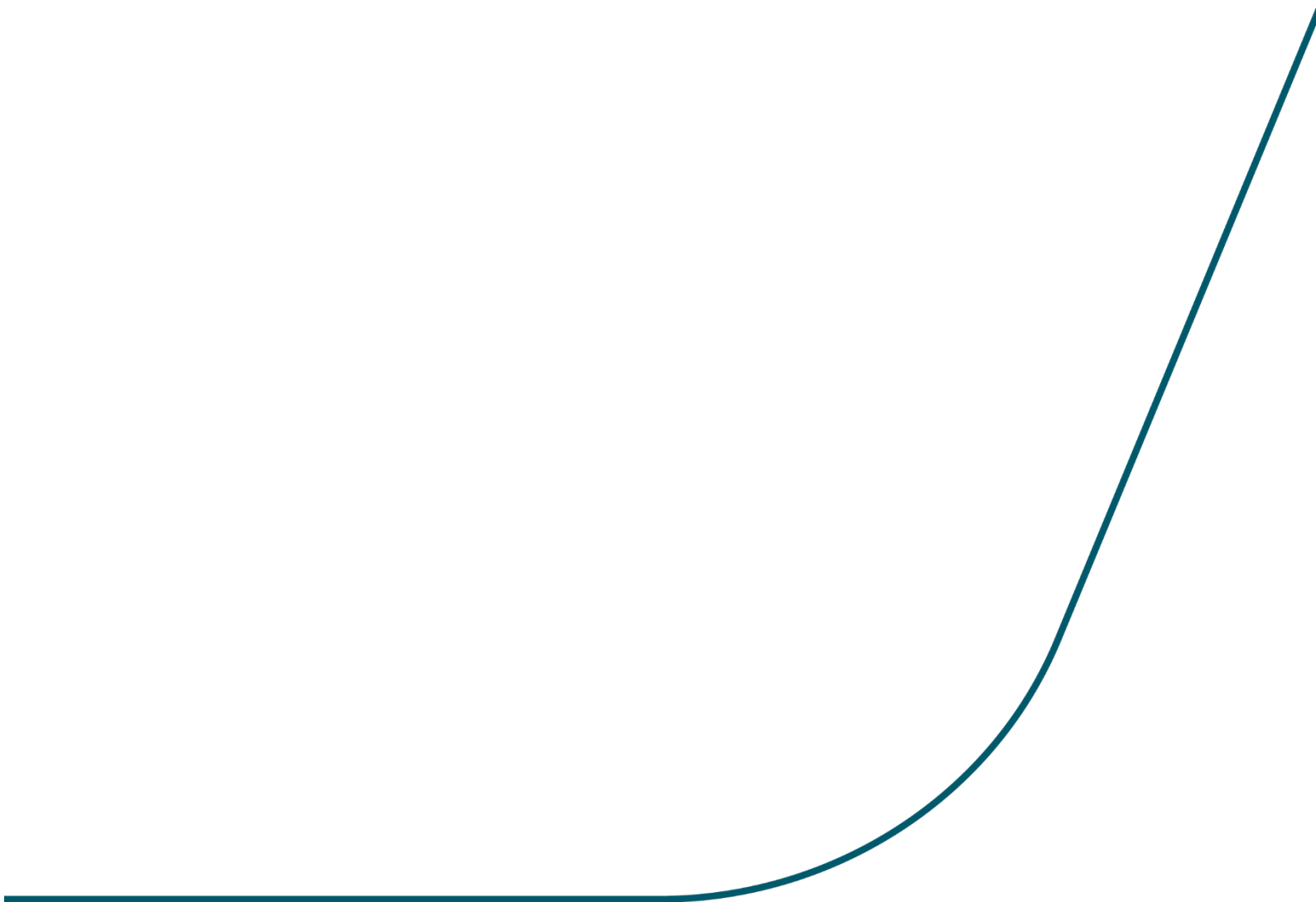


Food Allergens

Managing food allergen risks within your business helps to ensure food is safe for customers and minimises the risk of serious adverse reactions occurring.



Food Allergens

Introduction

Exposure to some foods can cause people to have an adverse reaction, such as an intolerance (e.g. lactose intolerance) or a toxic response (food poisoning). A study by the Food Standards Agency in 2024 (Patterns and Prevalence of Adult Food Allergy Study (PAFA)) found that more than 30% of the UK population reported some type of adverse reaction to food and that 6% of the population (2.4 million people) have been formally diagnosed with a food allergy. This can negatively impact a person's life and in severe cases could be fatal. Recent high-profile cases highlight this and include the [Dairy Allergy Fatality at Costa Coffee](#) and the death of a teenager at Pret a Manger which led to the introduction of [Natasha's Law](#).



The World Health Organisation (WHO) has identified food allergens as a significant global public health issue and have increased education and advocacy about allergen awareness through the Joint Food and Agriculture Organisation of the United Nations (FAO).

This Loss Prevention Standard outlines the key risk exposures and how to effectively manage food allergens within any organisation where food or ingredients may be present, e.g., cafes, workplace canteens, mobile food units, schools.

Definitions

Understanding the difference between a food allergy and food intolerance is important when planning how to manage the risk to individuals. The [NHS](#) defines food allergies and intolerance as:

- **Food Allergy.** A food allergy is an immune system reaction to a food. A food allergen is an ingredient or chemical in a food that causes your immune system to react. Allergic reactions happen when your immune system fights too strongly against an allergen and causes you to get sick. Allergic reactions can happen within minutes to several hours after you eat, touch, or smell the food. You can also have a second reaction up to 8 hours later.
- **Food Intolerance.** A food intolerance is when you have difficulty digesting certain foods or ingredients in food. It's not usually serious but eating the food you're intolerant to can make you feel unwell.

Understanding the Risk

A global priority list of food allergens has been established by The Food and Agriculture Organisation of the United Nations (FAO) and the WHO and includes foods with the potential to cause severe harm to individuals who are allergic to such foods. In the UK, the Food Standards Agency has identified 14 key food allergens with information available on their website [Food Standards Agency](https://www.foodstandards.gov.uk). These are:

- Celery.
- Cereals containing gluten – including wheat (such as spelt and Khorasan), rye, barley and oats.
- Crustaceans – such as prawns, crabs and lobsters.
- Eggs.
- Fish.
- Lupin.
- Milk.
- Molluscs – such as mussels and oysters.
- Mustard.
- Tree nuts – including almonds, hazelnuts, walnuts, Brazil nuts, cashews, pecans, pistachios and macadamia nuts.
- Peanuts.
- Sesame seeds.
- Soybeans.
- Sulphur dioxide and sulphites (if they are at a concentration of more than ten parts per million).

Managing Food Allergens

Roles and Responsibilities

Ultimately it is the organisation itself that is responsible for allergen management throughout their operations. However, it is advisable to allocate specific responsibilities and accountabilities to managers and supervisors in relation to the management of food allergens. This should be documented within either the food safety policy and procedure documentation or job descriptions.

Risk Assessment

When conducting a risk assessment for food allergens, consideration should be given to:

- Identifying all food products or ingredients used within the business and what allergens are present.
- Identifying any allergen foods or ingredients that may unintentionally come into contact with the food products.
- Who is the appropriate person e.g. manager/supervisor to speak with customers who have advised of an allergen.
- The physical form of the food or ingredient and how this may be unintentionally spread, e.g., is airborne spread possible from wheat flour dust.
- The quantity of a particular allergen that may trigger a reaction, e.g., 10% of people with a peanut allergy will react to 40mg of peanuts seed, but those with an allergy to shrimp may need to eat several grams before experiencing a reaction ([The University of Manchester](https://www.manchester.ac.uk)).

Risk assessments must be completed by a competent person. They must be documented and effectively communicated, and any identified control measures fully implemented and monitored for effectiveness. In addition to periodic reviews, risk assessments must be reviewed in the event of changes, for example new product development, if there are changes to the supply chain or changes to existing products, e.g., recipe variations.

Employee allergen exposures should also be considered, and suitable control measures should be put in place to minimise the risk of a member of staff experiencing an allergic reaction. Ideally any allergens should be established as part of the recruitment stage.

Hazard Analysis Critical Control Point (HACCP)

In the food, leisure and hospitality sectors, conducting a systematic documented Hazard Analysis Critical Control Point (HACCP) as part of the food safety management system should ensure that food allergen hazards in the food supply chain are adequately controlled, minimising the risk of unsafe food allergen working practices. When done well it will protect public health from food safety hazards, including exposing vulnerable individuals to food allergens.

Further information on HACCP can be found at the links below:

- [UK Food Standards Agency](#)
- [US Food and Drug Administration](#)
- [Food Safety Authority of Ireland](#)

Cross Contamination Prevention

Cross contamination is the unintentional transfer of harmful contaminants (e.g., bacteria, allergen materials such as wheat flour) from one food, surface or piece of equipment to another. The prevention of cross contamination in food production facilities and kitchens is a critical control measure in allergen management.

Actions that can be taken to minimise the risk include:

- The use of separate facilities, equipment or utensils.
- Cleaning utensils thoroughly prior to each use.
- Thorough hand washing.
- Separate storage of ingredients and prepared foods in closed and labelled containers.
- Good separation of foods and ingredients in chillers/freezers and dry goods stores.
- Management of cooking oils which may facilitate cross contamination, for example in deep fat fryers whereby it may be necessary to have separate gluten free fryers for use with gluten free products.

Cleaning

The correct cleaning methodology for the removal of allergens from food contact surfaces is an important control measure. The following factors should be considered when deciding on the correct cleaning procedures:

- Type of foodstuff involved, e.g., sticky paste residues are more difficult to remove than dry residues.
- Surface to be cleaned, e.g., stainless steel, wood, plastics.
- When cleaning equipment, can all parts be dismantled or accessed easily for cleaning purposes.
- Cleaning method – generally cleaning with clean water containing appropriate cleaning chemicals/detergents is better at removing allergens from surfaces.

Wherever possible, avoid using dry cleaning methods, e.g., vacuum cleaners and brushes without water as this method is not as effective in removing allergen containing materials.

For further information please see the [UK Food Standards Agency](#).

Training and Education

All training and education of staff should take place at induction stage before any work is undertaken. This should be supplemented with regular refresher training, e.g., on an annual basis, or when there are menu changes, and should be documented within the employees' training record.

The content must be tailored to suit the unique situation of the organisation, but as a broad outline the training should include:

- Understanding of the fourteen important food allergens and the potential consequences.
- What to do in the event of a customer suffering an allergic reaction whilst on the premises.
- The procedures for understanding customer allergen needs and how to manage the risk.
- How to accurately handle allergen information requests and document appropriately.
- The procedures for ensuring that allergen-free meals are served to the right customer.
- The risks of cross-contamination when storing, handling and preparing foods and how to prevent this.

Information and Communication

Effective communication and information/signage is important to remind staff of their roles and responsibilities and to provide employees and consumers with the relevant information so that safe and informed choices can be made. Messaging can be carried out and reinforced in several ways:

- **Verbal.** Staff ask customers whether they have allergies or intolerances when taking orders.
- **Written.** Statement on printed menus and flyers to inform customers how to obtain allergen information for the food available.
- **Written/Pictorial.** Instructions in the kitchen area to explain how to prevent cross-contamination.
- **Written.** Allergy matrix when planning recipes.
- **Pictorial.** Use visual cues to remind staff/customers of allergen risks.
- **Digital.** QR codes on menus linking to the allergen information for the meals.

Where businesses have operations in several global territories and are providing written information to employees and customers, ensure that information is published in the local languages to ensure that there is effective communication of allergen information.

Labelling and Packaging

Clearly label all products containing allergens, this can be provided in several ways, depending on the business and the most suitable method for clarity should be chosen. All labels should be easily understandable by the population of the country the product is being sold in.

Non-Prepacked Foods

Non-prepacked foods include foods sold loose in retail outlets, and foods which are not sold prepacked. Allergen information is still required for non-prepacked items, e.g., sold at a delicatessen counter, a bakery, a butcher, meals served in a restaurant, a buffet and from a takeaway. Allergen information can be provided via a menu, chalkboard, individual cards or via a QR code which links to the relevant information. If provided verbally by staff, the consumer should still be directed to where they can find more information, e.g., on the company website.

For further information see the [UK Food Standards Agency website](#)

Prepacked Foods for Direct Sale

Prepacked for Direct Sale (PPDS) food is prepared, prepacked, and offered or sold to consumers on the same premises. It can include food a consumer selects for themselves, e.g., from a display unit, as well as products kept behind a counter, or food sold at mobile or temporary outlets, such as sandwiches, salads, pies, etc.

Any prepacked food must have an ingredients list with the allergenic ingredients highlighted in bold. An example of a product label:

Ingredients: Water, Carrots, Onions, Red Lentils (4.5%) Potatoes, Cauliflower, Leeks, Peas, Cornflour, Wheat flour, Salt, Cream, Yeast Extract, Concentrated Tomato Paste, Garlic, Whey (Milk), Sugar, Celery Seed, Sunflower Oil, Herbs and Spice, White Pepper, Parsley.

Also, alcoholic drinks with no ingredients list must have allergens indicated by the word 'contains.'

Food Manufacturers

Manufacturers must include an ingredients list on the packaging and detail any allergens, similar to that of PPDS foods. They may also use precautionary allergen labelling where inadvertently a food product may become contaminated with an allergen during the manufacturing process, e.g., if the factory is not a nut-free factory due to the range of products manufactured.

If the food product is classed as "free from," i.e., made without certain allergen ingredients and is labelled as such, the company must demonstrate that rigorous controls are in place for that particular allergen e.g., "free from milk." The only exception is gluten free labelled products where a small quantity of gluten is permissible up to a maximum of 2 mg/kg.

Donations to Food Banks and Charities

Charitable donations by organisations and individuals have increased in recent years, along with the campaign to reduce food waste. It is still important to manage allergens effectively in this environment and allergen information should be provided in the same way as for any other food business. Volunteers should also complete allergy awareness training.

Monitoring and Verification

Regular documented audits, monitoring and verification of allergen management practices must be undertaken as part of due diligence and the food safety management system.

Independent verification of the processes and procedures is always worthwhile as it offers the opportunity to benchmark against industry best practice.

Checklist

A generic **Allergen Checklist** is presented in Appendix 1 which can be tailored to your own organisation.

Specialist Partner Solutions

Aviva Risk Management Solutions can offer access to a wide range of risk management products and services at preferential rates via our network of Specialist Partners.

For more information please visit: [Aviva Risk Management Solutions – Specialist Partners](#)

Sources and Useful Links

- [Food Standards Agency](#)
- [Chartered Institute of Environmental Health](#)
- [Anaphylaxis - NHS \(www.nhs.uk\)](#)
- [Anaphylaxis UK](#)
- [Chartered Trading Standards Institute](#)

Additional Information

Relevant Loss Prevention Standards include:

- **Product Liabilities for Retailers**
- **Street Catering - Property**
- **Commercial Kitchens – Extract Systems and Cooking Ranges**

To find out more, please visit [Aviva Risk Management Solutions](#) or speak to one of our advisors.

Email us at riskadvice@aviva.com or call 0345 366 6666.*

*The cost of calls to 03 prefixed numbers are charged at national call rates (charges may vary dependent on your network provider) and are usually included in inclusive minute plans from landlines and mobiles. For our joint protection telephone calls may be recorded and/or monitored.

Appendix 1 – Allergen Checklist

Location	
Date	
Completed by (name and signature)	

	Allergen Management	Y/N	Comments
1.	During staff recruitment and selection, is there any consideration of allergies that new employees may have to food items and how this may impact their duties?		
2.	Where can competent advice on food allergens be obtained, including legal updates?		
3.	Have roles and responsibilities for food allergen management been clearly defined and communicated to all?		
4.	Is training of all staff carried out, which includes food safety, food allergens awareness?		
5.	Are appropriate staff trained in HACCP principles?		
6.	Is annual refresher training in food allergens carried out for all staff?		
7.	Is there an appropriate documented inspection and audit schedule in place for food allergen risk management?		
8.	Are there procedures in place to minimise cross contamination?		
9.	Is there a documented risk assessment in place that is regularly reviewed and communicated to all relevant staff?		
10.	Are there documented procedures in place for assisting customers or staff who have an allergy?		
11.	Do menus clearly identify allergen information or signpost customers to where the information on allergens is available?		

12.	During staff recruitment and selection, is there any consideration of allergies that new employees may have to food items and how this may impact their duties?		
13.	Does all labelling and packaging clearly identify all allergens within the food item?		
14.	Are there procedures in place for allergen management of the supply chain?		
15.	Do cleaning practices minimise the risk of cross contamination?		
16.	Are foods appropriately segregated to minimise the risk of cross contamination? This includes all food items and ingredients, ancillary products (cutlery/packaging), clothing and equipment		
17.	Is allergen risk management taken into consideration when developing new products/recipes?		
18.	Where food may be donated to charities or food banks, is food allergen information included?		
19.	Additional Comments:		

Please Note

This document contains general information and guidance only and may be superseded and/or subject to amendment without further notice. Aviva has no liability to any third parties arising out of ARMS' communications whatsoever (including Loss Prevention Standards), and nor shall any third party rely on them. Other than liability which cannot be excluded by law, Aviva shall not be liable to any person for any indirect, special, consequential or other losses or damages of whatsoever kind arising out of access to, or use of, or reliance on anything contained in ARMS' communications. The document may not cover every risk, exposure or hazard that may arise, and Aviva recommend that you obtain specific advice relevant to the circumstances.

22nd October 2025

Version 1.0

ARMSGI3492025

Aviva Insurance Limited, Registered in Scotland Number SC002116. Registered Office: Pitheavlis, Perth PH2 0NH.
Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.