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ALLERGY SAFETY IN SCHOOLS HSEPO12

Culinera's position and how Culinera supports schools in meeting the Department for Education statutory guidance

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The Company/Caterer:	Culinera Limited		
Applies to:	All schools and education settings catered by Culinera		
Responds to:	Allergy safety in schools: statutory guidance for governing bodies of maintained schools and proprietors of academies in England (Department for Education, July 2026)		
Read alongside:	Culinera's 'Benedict's Law position statement and Allergy Safety Policy · Culinera's Food Safety Management System · the Allergy and Special Diets Policy for your site		
Next review:	June 2027, or on commencement of the forthcoming Regulations		

Contents

1. Purpose and scope

2. What has changed

3. Where responsibility sits

4. What the guidance asks of the catering service

5. What Culinera already has in place

6. What Culinera is doing for 2026/27

7. Culinera’s position on allergen information at the point of service

8. What Culinera needs from the School

9. Monitoring, review and contact.

1. Purpose and Scope

The Department for Education has issued new statutory guidance on allergy safety in schools. It follows amendments made by the Children's Wellbeing and Schools Act 2026 ('Benedict's Law), and it changes what governing bodies and proprietors are required to do.

The duties in the guidance sit with the School, not with the Company. Most of the practical controls the guidance describes involve food, and therefore involve the catering service. This paper sets out:

- what the guidance requires, and what is in force now as against what is still to come;
- which parts of it bear on the catering service;
- what Culinera already has in place;
- what Culinera is doing for the 2026/27 academic year;
- what Culinera needs from the School so that the School's policy and the catering operation align.

SCOPE

This paper applies to all schools and education settings catered by Culinera, and to all Culinera team members, including temporary and agency staff.. It should be read alongside:

- Culinera's Benedict's Law position statement and Allergy Safety Policy;
- Culinera's Food Safety Management System and HACCP;
- the Allergy and Special Diets Policy for each site;
- the School's own allergy safety policy and safeguarding procedures.

Culinera would rather be direct than reassuring. Where the guidance asks for something Culinera cannot safely deliver, or where Culinera's approach differs from what a parent might expect, this paper says so and explains why. Section 7 sets out that position.

2. What Has Changed

Section 100 of the Children and Families Act 2014 already required governing bodies, academy proprietors and pupil referral unit management committees to make arrangements to support pupils with medical conditions. Section 34 of the Children's Wellbeing and Schools Act 2026 amends that duty. Schools must now have an allergy safety policy, publish it and keep it under review, and must have regard to this statutory guidance.

A second tranche of duties is signalled but not yet law. The guidance states that the Government "intends to introduce" the following through forthcoming Regulations. No commencement dates are given.

What is required

- a named senior leader responsible for allergy safety;
- regular allergy awareness training for all staff, the guidance setting no fixed frequency;
- stocking "spare" adrenaline auto-injectors, which schools may already hold voluntarily under the Human Medicines (Amendment) Regulations 2017;
- recording serious incidents and near misses;
- publicising the policy and publishing it on the school website.

DUTIES IN FORCE NOW, AND THE CULINERA ACTION AGAINST EACH

DUTY	CULINERA ACTION
Have an allergy safety policy	Culinera will ask the School for a link to its published policy, and will provide a link to the Culinera position at www.culinera.co.uk/allergies
Provide allergen information for all food served — the 14 regulated allergens	Pre-packed for direct sale (PPDS) labelling under 'Natasha's Law' is in place on all PPDS items. A kitchen allergen matrix is available for all other (ie Non-PPDS') items
Make reasonable adjustments so pupils with allergy can access their free school meal entitlement	Culinera will work with the School wherever this can be done safely

3. Where Responsibility Sits

The guidance places the duties on the School. It also treats schools as "food businesses" for the food they supply, whether that food is prepared on site or sourced from a third party. The catering contract does not transfer the School's statutory duty to Culinera, and it does not relieve Culinera of its own obligations under food law. The two run in parallel.

	SITS WITH THE SCHOOL	SITS WITH CULINERA
Policy	Owning, publishing and reviewing the allergy safety policy	Providing a catering annex where requested, and operating to it
Accountable lead	Named senior leader for allergy safety	The Catering Manager, or the most senior person within the on-site catering structure
Pupil information	Holding the allergy register; Individual Healthcare Plans; Allergy and Asthma Action Plans; obtaining medical evidence	Receiving and acting on what is shared, and contributing the food element.
Clinical decisions	All of them — diagnosis, medication, supervision, capacity	None. Culinera cannot and does not make clinical judgements
Adrenaline devices	Prescribed and "spare" devices: purchase, storage, accessibility, checking, administration	Ensuring the team knows where the devices are; calling for help without delay
Emergency response	The School's procedure, staffing and training	Ensuring the team recognises symptoms, raises the alarm immediately and follows the School's procedure
Food safety and allergen control	Assurance and oversight	As set out in Food Standards Agency guidance and Culinera's current published policies
Allergen information at the point of service	Agreeing and endorsing the method	As set out in Food Standards Agency guidance and Culinera's current published policies
Food Culinera does not supply	Managing allergen risk in packed lunches, tuck shops??, parent-supplied food, curriculum cooking, external hires, rewards and treats	Outside Culinera's control and outside the Culinera HACCP chain

The boundary that matters most

Once food leaves the Culinera HACCP chain (for example where food is delivered to a classroom, held for a later sitting by school staff, or served by someone who is not a Culinera team member) then Culinera cannot control cross-contamination or correct service, and responsibility passes to the School. Where the School needs food handled beyond the Culinera point of service, Culinera will provide the requirement allergy information.

4. What the Guidance Asks of the Catering Service

NB: For the purposes of this document, the guidance's own distinction between **"must"** (a legal requirement) and **"should"** (expected practice) has been retained.

REQUIREMENT	FORCE	CULINERA POSITION
Allergen information for the 14 regulated allergens must be provided for all food served, and must be clear, accurate and easily accessible to pupils and their parents or carers	Must	In place. Kitchen allergen matrices are in place and managed by the Chef and Catering Manager
PPDS items must carry the name of the food, a full ingredients list and the 14 allergens emphasised	Must	In place. Labels are generated automatically from Culinera's central verified system
Gluten-free is 20 ppm of gluten or less; "very low gluten" is 21 to 100 ppm, under Regulation (EU) No 828/2014	Must	In place: Culinera does not offer products made in house as "gluten-free". Some products are made using non-gluten-containing ingredients (NGCI). Where a gluten-free product is required, it is offered through approved suppliers on request
Where menus are adapted at short notice, allergy needs and statutory allergen requirements must still be met, and changes should be highlighted	Must / should	In place through the kitchen allergen matrix, managed by the Chef and Catering Manager. Where food is pre-ordered in Culinera's primary schools, menus cannot be changed unless agreed with the School, including a review of the allergies affected
Heads and governors should work with caterers, parents and pupils to identify, minimise and manage risk	Should	A standing discussion point in all Culinera client meetings
Responsibility for allergy safety should not be left with a catering manager	Should	The Culinera catering lead supports the School's named senior leader and does not replace them. All catering teams are trained in allergy management
Catering staff should be available to meet parents and carers to discuss allergen-safe meals	Should	In place (on request)
Staff should be educated in reading labels for allergens and in preventing cross-contamination during handling, preparation and service	Should	In place. 100% of teams trained
Settings operating as food businesses should record and review all allergen incidents and near misses, and seek advice from environmental health or their Primary Authority where appropriate	Should	Logging in place through the Culinera incident reporting system
At least two robust methods of identifying pupils with known allergy at mealtimes are good practice	Good practice	For School policy to determine

REQUIREMENT	FORCE	CULINERA POSITION
Pupils with food allergies should not be segregated from their peers at mealtimes	Should	For School policy to determine
Reasonable adjustments for free school meal entitlement should be captured in an Individual Healthcare Plan	Should	Reasonable support, in partnership with the School in the creation of a Culinera Special Medical Menu
Inviting new joiners with allergy on a kitchen tour may reduce anxiety	May	In place on request
Allergy champions among staff and pupils, not just in the catering team	Suggested	For School policy to determine

Culinera's own policy also adopts the principles of 'Benedict's Law', which set a higher standard than the guidance requires.

5. What Culinera Already Has in Place

Culinera already had the following controls in place before this guidance was published, and each is available to the School on request.

CONTROL	WHAT IT IS
Benedict's Law and Allergy Safety Policy	Board-level policy. Sets the non-negotiable standards: verify every time, pause if unclear, never guess, never serve on incomplete information
Food Safety Management System	HACCP-based, with allergens treated as a defined hazard at multiple all appropriate critical control points across purchasing, storage, preparation, cooking, service and transport
Primary Authority partnership	Culinera policies and procedures are reviewed by the Food, Health & Safety Manager against agreed legal standards in partnership with local authority partners, supported by Navitas Safety
Central recipe and supplier system	Central management of recipes and suppliers, with suppliers feeding allergen data directly, so information stays 'live' rather than being retyped
Kitchen allergen matrix	The single source of truth at the point of service, current to that day's production
Site Allergy and Special Diets Policy	A school-specific procedure document, co-badged with the School, covering identification, individual meal plans, service controls and escalation
Allergen risk assessment	Site-level assessment of preparation and service risk, reviewed annually and on change
Individual meal plans	For pupils with diagnosed allergies: documented medical information, individual risk assessment, agreed safe options and an agreed communication route
Allergen incident investigation	Structured investigation of any alleged reaction, with root cause and corrective action.
Allergen awareness training	All team members.
Kitchen and service-area signage	Prompts for pupils to ask, and team-only allergen prompts held away from pupil view

6. What Culinera Is Enforcing for 2026/27

6.1 NAMED CATERING LEAD

A named catering lead is confirmed for each site. This is the Catering Manager, or the most senior person within the catering structure. Where no senior person can be identified on site, allergy decisions are escalated to the Culinera senior management team. The named catering lead is the operational counterpart to the School's named senior leader, and not a substitute for them.

6.2 ADDITIONAL TRAINING

Benedict's Law training and allergy refresher training are completed by all team members.

6.3 ADDITIONAL NEAR-MISS REPORTING

All team members know how to report a near miss. Near misses include a mislabelled delivery, an unclear query and a substitution notified late.

6.4 REINFORCEMENT OF MENU CHANGE PROTOCOL

All team members understand the menu change protocol:

- Primary schools and pre-ordered meals: Where a recipe has changed from the published menu, no meal may be served until the School has agreed the change.
- Secondary schools and non-pre-ordered meals: Pupils must ask what food is suitable before purchase. The daily allergy briefing and the kitchen allergen matrix must be in use.

6.5 AWARENESS OF ADRENALINE DEVICES

All team members know the location of the School's spare adrenaline devices, where the School holds them, and the route to the nearest prescribed devices.

6.6 KITCHEN TOURS AND PARENT MEETINGS

Culinera offers a kitchen tour to every pupil with a recorded allergy joining in September, and to any parent on request at any point in the year.

6.7 INDIVIDUAL HEALTHCARE PLAN CONTRIBUTION

On request, Culinera will draft the catering section of a pupil's Individual Healthcare Plan (Culinera Special Medical Menu), including free school meal reasonable adjustments.

7. Culinera's Position on Allergen Information at the Point of Service

The guidance requires that allergen information for food that is not pre-packed (ie open food served from a counter, or made to order) **must be provided, and must be clear, accurate and easily accessible** to pupils and their parents or carers. It does not prescribe how this information should be made available; It points to the Food Standards Agency's best-practice guidance on allergen information for non-prepacked foods for the detail.

The Culinera method, in a secondary or self-service environment, is verified information delivered by a trained team member at the point of service, drawn from the kitchen allergen matrix and supported by clear and prominent signage telling every pupil to ask before they choose. Culinera does not rely on pre-published allergen menus or printed counter labels as the primary source.

Culinera take this approach because:

- In a fresh-production kitchen serving a thousand or more pupils in a short window, ingredients may need to change for many reason (delivery variations , substitutions, production adjustments). Printed information goes out of date faster than it can be reprinted.
- Static labels cannot describe potential cross-contamination, which in a self-service environment is a significant risk and the one most likely to cause illness. A label that lists a dishes ingredients accurately can still be misleading about that dish as actually served.
- Published information reduces the likelihood of the conversation that is the single most effective control. A pupil who has read a board is less likely to ask.
- Culinera has risk-assessed every method of allergen communication and holds that assessment on file. It is available to the School, and to any parent who asks for it.

The Culinera approach:

- Culinera will not withhold information. Every pupil and parent can have full, verified allergen information for anything Culinera serves, on the day, from a trained team member (and in advance by arrangement for an individual meal plan).
- PPDS items carry full printed labels.
- What Culinera does not do is publish a static allergen document and let it stand as the answer, because in this environment that document may possibly contain out of date information.
- Culinera does not claim to eliminate risk. We undertake to do everything we can to reduce risk as far as possible
- Culinera does not use nuts in food prepared in house, but cannot guarantee that any dish is free from any other allergen.

- Where a school's own policy, or a parent's expectation, calls for published allergen information, Culinera will meet the School to work through it. In primary and pre-ordered settings, where production and service are far more controlled, a different balance is often appropriate and Culinera will say so.
- Accuracy over speed. Where allergen information is unclear, service pauses.

8. What Culinera Needs from the School

CULINERA NEEDS	WHY	BY WHEN
The name and contact details of the School's named senior leader for allergy safety, and their deputy	So there is one route for notification and escalation, not a search for the right person mid-incident	As soon as possible but in any event no later than the first week of term. Any changes to this role should be identified to Culinera as soon as possible.
The allergy register, and a route to notify Culinera when it changes	So we understand the needs of the school and relevant pupils.	Before first service, then on every change
The catering-relevant part of each Individual Healthcare Plan and Allergy and Asthma Action Plan	Culinera acts on what it is told, and agreed	Before first service. Any changes to this plan should be identified to Culinera as soon as possible
Medical evidence where a pupil needs an individual meal plan	So provision rests on clinical advice, not on Culinera's interpretation of a parent's description	Before the plan starts. Any changes to this plan should be identified to Culinera immediately
The location and stock status of the School's spare and prescribed adrenaline devices	The catering team needs to be able to direct paramedics, and to tell the School if the dining room is out of reach	As soon as possible but in any event no later than the First week of term. Any changes to this information should be identified to Culinera as soon as possible.
Endorsement of the agreed allergen information method in the School's published policy	So that the School's policy and the catering operation describe the same method	Before the School publishes

9. Monitoring, Review and Contact

Culinera will monitor compliance with this paper, review incidents and lessons learned, and update the paper in line with legislative or operational change.

This paper is maintained by the Culinera senior management team. It will be reviewed no less than annually, and immediately on commencement of the forthcoming Regulations or following any serious incident or near miss at a site Culinera operates.

If anything in this paper does not fit a particular operational setting, the School should advise as soon as possible and Culinera will do everything they can to adapt it. Our approach is that Culinera would much rather have a conversation in September than after an incident.

DISCLAIMER

This paper is non-contractual and does not confer legal rights. Culinera reserves the right to amend it as required. It does not transfer, reduce or replace any statutory duty held by the School.