

1st June 2022

Provision of Allergen Information in the Out of Home Food Sector

Final report

<https://doi.org/10.46756/sci.fsa.fbo151>

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1. Background

In 2019, the Food Standard Agency (FSA) committed to making food hypersensitivity a top priority, establishing the Food Hypersensitivity (FHS) Programme. The vision of the FHS programme is to ensure those with food hypersensitivities (including those with food allergies, intolerances, and/or coeliac disease) have a good quality of life and are supported to make safe, informed food choices. [The FHS programme](#) has three key themes and associated objectives: safety, trust, and choice.

Food business operators (FBOs) must communicate the presence of allergens in food to consumers. The Regulation on the Provision of Food Information to Consumers (FIC) requires businesses to ensure that all mandatory food allergen information (relating to the 14 regulated allergens) is accurate, available, and easily accessible to customers. Legislation states that businesses must provide allergen information for any non-prepacked food item that includes any of the 14 allergens, but not how this information should be delivered (although there is a legal requirement for allergen information to be clearly signposted to the consumer). This is different, for example, to prepacked for direct sale (PPDS) food, where there are specific requirements (introduced from October 2021) for businesses to have a label that displays a full ingredients list, with allergenic ingredients emphasised.¹ FBOs are also required to control allergens within their premises in the same manner as other food hazards.

For non-prepacked food sold in the out of home sector (for example, the food sold in restaurants and delis) this mandatory allergen information can be provided verbally

¹ FBOs interviewed as part of this research were not necessarily selling PPDS and therefore not expected to be aware of this legislation.

or in writing. Businesses selling non-prepacked food may approach this in a number of different ways, such as including full allergen information on a menu or chalkboard, a separate allergen information pack or matrix, or providing a written note informing customers where they can access more information, for example by speaking to staff. Distance selling business (such as takeaways) are required to make allergen information available in some form before purchase is concluded, as well as at the moment of delivery, and the FSA's allergen technical guidance offers some suggestions for how this information can be provided.

The FSA are interested to understand the allergen information needs and preferences of people with FHS and food businesses. This will enable them to make recommendations for improving allergen information so that people with FHS can make safe, informed food choices. This would be informed through: an understanding of what information consumers need when making decisions about purchasing non-prepacked food; how this is best communicated, as well as FBOs current methods for making such information available; why they take these approaches; and what the impact would be on them of a more standardised way of presenting allergen information.

This comes at a time when the public are engaged with debates about allergen information, and calling for changes in the laws around what allergen information restaurants must share so that customers have full visibility on what they are ordering. High profile stories of people living with FHS who have died as a result of their allergies have fueled this public interest. Particularly relevant for this piece of work is the [Owen's Law campaign](#), which calls for additional legal requirements around how allergen information is communicated on non-prepacked foods. Sitting tangentially to this is [Natasha's Law](#), which came into effect in October 2021 and

requires all PPDS food to be labelled with a full ingredients list with allergenic ingredients emphasised.

This report presents the findings from a research programme that was set up in order to understand current consumer needs for, and FBO approaches to, allergen information for non-prepacked food, and the impact of potential changes on consumers and businesses alike. The research programme included an online ethnographic community with FHS consumers, paired depth interviews with FHS and non-FHS consumers, individual depth interviews with FBOs and stakeholders, and a quantitative survey with FBOs.

2. Objectives

The overall objectives of this research are:

1. To gain insight about the information needs of FHS consumers when eating out; what information they would find most useful and how they would like this to be presented.
2. To explore the impact of menu changes on non-FHS consumers in particular how changes may affect readability and understanding of menu information.
3. To explore the current provision of allergen information by businesses in the non-prepacked sector, including businesses' views on different options for presenting allergen information to consumers (for example, on menus).

These aims are addressed through qualitative research with FHS consumers and with businesses.

The key objectives of the **consumer qualitative research** were to understand the needs of FHS consumers when eating out, and to sense check these learnings with consumers who do not have food hypersensitivities. This included exploring:

- What is working well, and what is working less well about existing allergen information
- What gives FHS consumers confidence in non-prepacked food providers, and what they do not trust
- What types of allergen information FHS consumers prefer (for example, symbols, QR codes, allergen books or matrices, verbal explanations, etc.)
- The main challenges FHS consumers encounter when ordering non-prepacked food
- The impact of menu changes on non-FHS consumers

The key objectives of the **business qualitative research** were to understand the current approaches FBOs take to allergen labelling and the reasoning behind this. It was also important to understand their views on different options for presenting allergen information to customers. This included exploring:

- How they currently present allergen information and the rationale behind this.
- Their thoughts and feelings about displaying allergen information.

- How they currently engage with consumers about allergen requirements.
- To what extent they would be affected by potential legislative change (for example, making it mandatory to put allergen information on menus or making it mandatory for a member of staff to proactively ask about allergies).
- Their suggestions for improvements to allergen information and testing ideas from the consumer research.

The key objectives of the **business quantitative survey** were to assess and validate the qualitative findings at a larger scale. This included exploring:

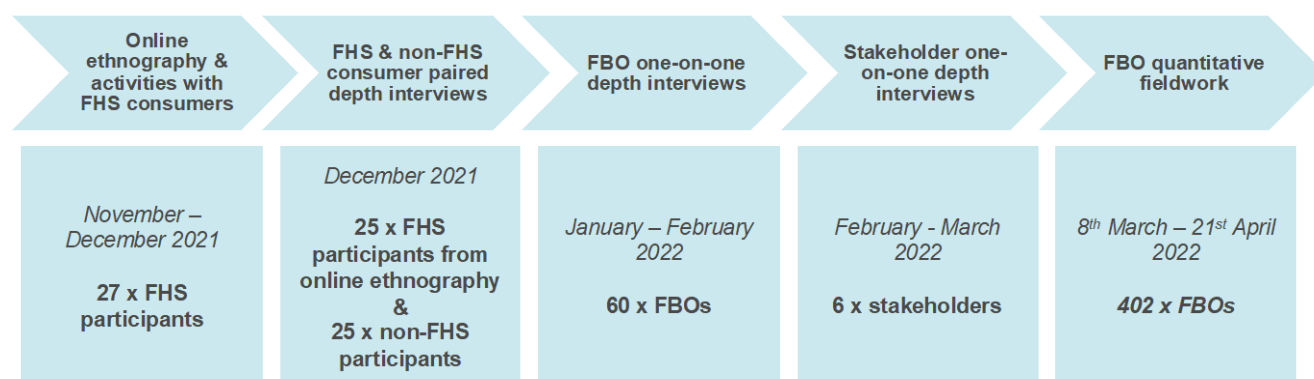
- Their current approach to allergen information.
- Perceived effectiveness of their approach and challenges with allergen information.
- How they keep allergen information accurate and up-to-date.
- Their sentiment towards -the feasibility of implementing - additional allergen information changes and interventions.

3. Methodology and sample

The below outlines the methodology for the study.

The first, qualitative, phase was with consumers and FBOs and this was followed by quantitative research with FBOs as shown below:

Figure 1 Overview of methodology



Consumer sample details:

27 FHS participants completed the online ethnography and activities – a two-week online community where participants kept a diary of their experiences of ordering and eating non-prepacked food when out of home, and discussed what works well and less well when it comes to allergen information. Of these 27 FHS participants, 25 also took part in paired in-depth interviews with non-FHS participants – where they discussed some of the ideas that emerged from the online ethnography, as well as some proposed legislative changes.

FHS participants were recruited across a spread of different allergies / intolerances / coeliac disease, and with conditions of varying severity, defined as:

- **Mild FHS** consumers have slight, non-fatal responses (for example, mild rashes or mild gastrointestinal discomfort) to specific foods, including both common and less common allergens. They tend to avoid specific allergens in order to feel their best, but will not experience substantial impacts should they come into contact with allergens.
- **Moderate FHS** consumers typically face gastrointestinal and non-fatal responses to eating the allergen. Their allergens are frequently ‘common’, such as found in the top 14 allergens list. Most can eat small quantities of the

allergen, and often do not have significant concerns regarding cross-contamination.

- **Severe FHS** consumers include those who face potentially fatal consequences to eating the allergen, often carrying an EpiPen. They also include consumers who face potential long-term health consequences after eating the allergen, even if not fatal. These consumers have to consider both direct consumption of the allergen and risks of cross-contamination.

The 25 non-FHS participants were individuals who have never been diagnosed with an allergy or coeliac disease nor medically or self-diagnosed with an intolerance. They were also recruited to not live with anyone with FHS.

The full details of the consumer sample are available in the appendix in this report.

FBO qualitative sample details

We completed 60 depth interviews with FBOs. They were recruited to represent a range of different business types:

- Restaurants
- Cafes
- Canteens
- Takeaways
- Mobile food units
- Delicatessens
- Hotels/guest houses
- Leisure/entertainment venues
- Pubs/bars
- Education
- Institutions
- Hospitals
- Other

We also spoke to six key stakeholders within the food industry who are directors, CEOs, or who lead on allergen information in trade associations.

NB: The tables in the Appendix provide a detailed breakdown of the qualitative sample.

Quantitative survey sample details:

402 FBO decision makers completed an 18-minute CATI (telephone) survey, between 8th March and 21st April 2022.

The sample included:

- 232 independently owned businesses, 40 part of a local chain, 126 part of a national chain and 4 others.
- 95 in businesses with <9 employees, 137 with 10-49 employees, 102 with 50-250 employees and 68 with >250 employees.
- 27% of the sample were hotels/ guest houses, 25% were restaurants, 16% were pubs, 9% were cafes and 7% were takeaway 4% mobile food units , 12% other.

Limitations of the approach

In the consumer research, of the 27 FHS consumers taking part, 16 said they had a moderate allergy, 9 said they had a severe allergy, and 2 said they had a mild allergy. The data is therefore more representative of those with moderate allergies who may have to worry less about cross contamination and severe reactions.

It should be noted that most non-prepacked food businesses are small businesses, with 77% having fewer than 9 employees². Whilst larger businesses may have multiple outlets they represent a smallest proportion (<1%) of the total number of food businesses. Drawing the data to allow comparisons across business sizes has meant it is not nationally representative of business size.

The research covers a wide range of business types as outlined above and in the appendix, but the numbers in each group do not allow for subgroup analysis by business type. The majority of the businesses in the quantitative sample were restaurants, hotels / guest houses, and pubs (68%). There were only a small number of cafes (9%), takeaways (7%) and mobile food units (4%). Different types of

² [Office of National Statistics \(ONS\) food service industry businesses](#)

business can have different models of service. For example, a restaurant or hotel might offer a table service that provides menus and a food server to take the order, whereas a café may offer a counter service and not produce menus. Food businesses offering different service models were less well represented. It is therefore not possible to generalise the findings across the non-prepacked sector.

Since the research has taken place there have been a number of new challenges for the food industry due to the war in Ukraine and the cost of living crisis. These factors are not considered in the research.

4. Key findings

- 1. There are two contextual factors which shape attitudes to FHS: a perception that awareness and acceptance of allergies in wider society is growing, and the ongoing impact of the COVID-19 pandemic.** The first factor is helping to address FHS requirements, with both businesses and consumers feeling the changing narrative around allergies has improved choice and information for some of those with FHS. The second factor however has created new challenges for FBOs in delivering allergen information to customers – due to supply chain issues and staff shortages. These challenges have meant that trade bodies noted that now is not a good time to bring in new legislation for food businesses.
- 2. FBOs and FHS consumers are on the same page about a lot of aspects when it comes to allergen information.** Both want FHS consumers to have positive eating out experiences and believe that the FHS consumer knows their allergy best. Both also express a desire for greater standardisation in approaches to allergen information, and for ‘best-in-class’ models to provide clarity on what good looks like.
- 3. However, there are a number of core tensions in the preferences of FBOs and FHS consumers, which create challenges.** Consumers are striving for a ‘normal’ experience where they have autonomy over their food choices and can make decisions with minimal interventions from staff, trusting their own interpretations of written allergen information more than verbal communications. Conversely, businesses need to treat FHS customers differently given the risks posed by allergies, and often need to make changes ‘behind the scenes’ to ensure the safety of customers. They therefore want to work with customers to find the right options for them, which often requires conversation.
- 4. Consumer trust in allergen information is driven by three key factors: how sincere a business appears to be in their FHS approach, the perceived risk of human error posed by a business, and familiarity with the business itself.** This in turn influences how they engage with allergen information in each setting, for example whether they are likely to speak to staff or rely on written materials.

5. **Consumers aspire to an allergen information approach that puts them in control**, for example: good online information that allows them to conduct research in advance; access to information within a venue in a fuss-free way; written materials that are clear, easy to read, and which focus on what they *can* eat, with verbal interactions with staff used as a final check. This contrasts with FBO preferences for conveying information verbally in the first instance and ensuring that allergen requirements are surfaced so that appropriate steps can be taken to manage cross-contact when food is prepared.
6. **There are a number of common factors in the way in businesses approach the provision of allergen information, but there are no processes that are used by the majority.** Most common is an allergen notice or statement on the menu, with two in five businesses adopting this approach. Other more frequent methods include separate allergy menus , allergen matrices and asking customers about dietary requirements, with a quarter of businesses deploying each of these methods.
7. **Whilst staff play an important role in the communication and management of allergen information, the degree to which they are trained is mixed across businesses.** Just under a quarter (23%) of FBOs report unprompted that they have staff training as part of their current approach with this more likely among chains than independently owned businesses (28% compared with 20%).
8. **Businesses are best grouped by looking at behavioural and attitudinal commonalities.** While factors like size and positioning are important, nuances in preferences and needs between different businesses have the greatest impact – specifically whether a business has a fixed or flexible approach to allergies (behavioural), and whether they have lower or higher engagement with FHS (attitudinal).
9. **While overall FBOs are resistant to legislative changes around FHS, the quantitative research indicated that FBOs feel proposed changes sought through campaigns are feasible, although smaller businesses are less likely to feel this way.** These changes include full allergen labelling on menus, a legal obligation to ask consumers about their allergy requirements,

and using allergen matrixes., However, FBOs, particularly smaller business, also express concerns about these suggestions, including information overload on menus; more written information meaning fewer verbal conversations; and practicalities around changing menus. In addition, while FBOs in the quantitative survey are generally positive about asking consumers about their allergy requirements, the qualitative work found there is a strong feeling that this should not be a legal requirement, as it puts the onus solely on businesses, which they don't feel is fair, or practically possible in all circumstances.

10. Support and guidance for FBOs is important, particularly given wider challenges such as the pandemic, EU Exit and disruptions to supply chains. The past few years have been turbulent for FBOs, and they have had to adapt quickly and often to new challenges. This context contributes to their resistance to potential changes to FHS legislation. Should any changes in requirements be introduced, businesses would need clarity and support in how to implement new approaches. Businesses would also benefit from guidance on how to best navigate the challenges they are facing currently when it comes to the impact of these on their allergen information and allergen management processes (for example, ingredient substitutions).

A note on the FBO methodology

The FBO research involved a qualitative phase and a quantitative phase. Findings are broadly consistent but there are some nuances. In the qualitative interviews, many topics were discussed spontaneously rather than being prompted, and participants were afforded greater time to reflect. We therefore find that responses to themes such as potential changes in legislation are less positive in the qualitative findings, compared with the quantitative findings.

5. Contextual findings shaping attitudes to allergy information

The broader context

Consumer expectations around allergies and allergy information, as well as the approaches adopted by FBOs, are influenced by a number of different contextual factors. Increasing societal awareness of FHS needs and the challenges posed to the hospitality sector by the COVID-19 pandemic play a role. This wider context shapes attitudes towards FHS and thereby impacts behaviours taken by both businesses and consumers in relation to allergy information.

A perception that awareness and acceptance of different dietary requirements is growing

In general, FHS consumers, non-FHS consumers and FBOs believe that awareness and acceptance of different dietary requirements – including intolerances and allergies – is higher now than it ever has been. And with this, empathy for those with food hypersensitivities is felt to have improved considerably over time.

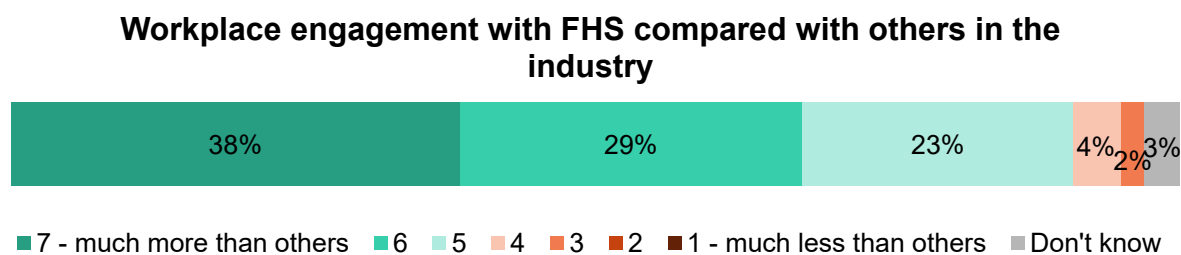
Most FHS consumers – particularly those with mild or moderate conditions, and more common allergies – note that their own experience of purchasing and eating non-prepacked food out of home has improved significantly over the last five years. Additionally, FBO decision-makers who have worked in the hospitality sector for a while observe marked changes in the openness and tolerance of food businesses when it comes to catering for allergies in general.

Most FBOs report noticing an increase in the prominence of FHS requirements over time, and have therefore taken steps, however small, to adapt to this through their menus and approaches to allergen information. The vast majority (93%) agree that they feel better equipped to deal with customers' allergies, intolerances or coeliac disease now than a few years ago, and when asked how engaged their business is compared to others in the food and beverage industry, many (68%) think they are doing much more than other businesses³ and over a quarter (28%) think that they are doing similar to other businesses⁴.

³ Giving a rating of 6-7 on a scale of 7

⁴ Giving a rating of 3-5 on a scale of 7

Figure 2 Perceived workplace engagement with FHS⁵



Base: All respondents (n=402)

FHS is also something they expect to keep growing in importance, and many are considering this with regard to the future of their business.

"Allergens have become a massive thing over the years. Labelling on takeaway products is even more important than it was."

Development Chef, Institution, >250 employees, England (Suburban)

While the direction of travel is felt to be good, FHS consumers in particular feel there is still work to be done. Although they feel awareness has increased, they also believe this is generally weighted towards eating *choices*, such as good labelling of vegan and vegetarian foods, whilst information about allergens can still be lacking, much to their frustration. This is particularly true for those with a severe hypersensitivity, who are at the greatest risk. It is not clear from the data why food businesses take this approach, allergens and eating choices identified in the research as commonly labelled on menus are those that do not pose an immediate risk of an allergic reaction if the information is incorrect or if cross contamination

⁵ C1. On a scale from 1-7, where 1 is "The business is doing much less than others in the industry" and 7 is "the business is doing much more than others in the industry", compared to other businesses in the food and beverage industry, how engaged do you think your workplace is with allergies, intolerance, and coeliac disease information?

occurs when the food is prepared. However, the quote below illustrates that people with food hypersensitivity use this information as a proxy which is a potentially dangerous practice. The absence of an allergen in a dish does not removed the risk of cross-contamination with the allergen when the food is prepared.

"There is no specific allergen information about dairy, though there are a lot of vegan options which will be dairy free so I would either use that or ask the server."

Moderate Intolerance, Male, 18-30

The overall increase in awareness of allergen requirements gives FHS consumers higher expectations of what businesses can, and should, provide in terms of allergen policies and information. For example, a high proportion of FHS consumers feel that businesses should share details of ingredients to allow customers to request substitutions or should make detailed allergen menus available. They can also be frustrated when they feel a business' approach to allergies does not meet the standard they expect for that sort of FBO, such as staff at a well-known chain restaurant lacking knowledge about allergens.

"We found that there was no indication on the menu of anything meaningful for allergy sufferers. There are a couple dishes [...] and it says to speak to staff, but I don't know from the website if there's a separate menu – or are you just literally reliant on the staff member telling you your options?"

Moderate allergy, Female (Parent), 31-50

The impact of the COVID-19 pandemic

Substitutions, supply chain and staff

The vast majority of the businesses within our sample report challenges resulting from the COVID-19 pandemic, which can influence their attitudes towards and behaviours around allergen requirements and information.

Many businesses describe ongoing supply chain challenges caused by the pandemic, meaning that substitutions are a more common problem. The need t (often through long-winded manual processes) to update allergen information and

communicate this to staff has discouraged some businesses from making substitutions at all, preferring instead to just have gaps on the menu.

In addition, stakeholders from the industry trade bodies within our sample report that supply chain challenges have meant businesses are turning to smaller suppliers to get what they need. However, there is a perception that these suppliers are often less knowledgeable about allergens and sometimes do not grasp the importance of clear and detailed allergen information, making allergen labelling for FBOs more difficult and time-consuming.

Shortages of staff in kitchens creates challenges in terms of physically delivering allergen-free dishes, given the additional time taken to prepare utensils and surfaces etc. which leads to allergies being considered more of an annoyance than in the past. A shortage of front-of-house staff also means that less knowledgeable or less experienced staff are being hired who are less familiar with allergens or the processes used to address them.

These challenges are also raised by the industry trade bodies interviewed as part of this research, who cite the impacts of the COVID-19 pandemic as the biggest difficulties currently facing food businesses. In particular, the loss of 'collective corporate memory' around FHS processes, driven by extended closures across the hospitality industry, is felt to be a challenge that businesses will need to continue to navigate as business-as-usual resumes.

"20% of staff haven't returned from furlough. There are a high number of new starters who haven't worked in the sector before. That understanding [about FHS] needs to be trained back in."

Stakeholder, Trade Association

"We've got a whole bunch of new teams right now and I don't think they would be aware of all 14 allergens and what to do / what not to do. You need experience of the process – it's easy to forget what the process should be and what the next steps are."

General Manager, Pub (National chain), >250 employees, England (Urban)

Industry trade bodies also point out that businesses are still a long way from recovery, and now is not the time for new legislation and the associated upheaval

and costs. Whilst a number of businesses express a reluctance to make changes to current approaches as they are wary of the impact this will have after a difficult time for the hospitality industry. For some, this is about adding extra pressures and standards to the business as they try to find their feet. For others, the concern is more around alienating regular customers who are seeking a return to normal.

"The industry has just been through two years of hell, and they are just focusing on keeping their businesses going. They don't have any extra capital for implementing these changes."

Stakeholder, trade association

"It's getting to the stage that you think it's not worth doing food. There's so much bureaucracy, and we make a very small margin on food. We've all been through the difficult time of the pandemic. You've got to balance making a profit and spending 80% of your time doing the paperwork."

Owner, Leisure/entertainment (Independent), 10-49 employees, England (Urban)

Technological innovation

A number of businesses report adopting online ordering, often via QR codes, during the pandemic, and others used QR codes for NHS venue check-ins. Businesses who have had positive experiences with QR codes, and whose customers have been easily able to adopt them, are warm to the idea of embracing QR codes and other digital technologies for presenting allergen information, so are open to innovating in this space. For other businesses where the experience with QR codes during the pandemic was less smooth, the idea of using more digital approaches is much less appealing.

Some businesses removed physical menus during the pandemic and are therefore hesitant about approaches to communicating allergen information which require printed or physical menus.

"Checking in with the COVID app – that was a nightmare... it's so simple, but even something like that customers were struggling with. A QR code for allergen information is a good idea, but you'd need a paper version as well."

Manager, Restaurant (Independent), 50-249 employees, England (Urban)

Synergies and tensions between FBOs and consumers

There are a number of areas where the views of FBOs in relation to allergen information chime with those of consumers. However, there are also some resulting tensions in how these views play out when it comes to expectations of how allergen information should be presented and managed.

There are three core points of synergy and tension:

Core points of synergy and tension	Term	Explanation
Both FBOs and FHS consumers aspire to positive experiences of eating non-prepacked food out of home	BUT	For FHS consumers, this means being treated like a 'normal' customer, whereas for FBOs this means openly recognising the different requirements that someone with an allergy has
Both FBOs and FHS consumers believe the consumer knows their allergy best	BUT	FBOs want to work with consumers to identify the right choices for them, whereas FHS consumers want total autonomy over their decision
Both FBOs and FHS consumers express a desire for greater standardisation of allergen processes and more clarity over responsibility for surfacing customer allergies	BUT	For FBOs this would mean making it the joint responsibility of the customer and the business to uncover any allergy requirements, whereas for FHS consumers this would mean the business providing detailed, accurate written allergy information to avoid conversations with staff

The desire for a positive experience

What FHS consumers want more than anything is to enjoy the same experience of eating out of home as non-FHS consumers do. They want the process to feel as normal as possible and would prefer to limit any factors that deviate from this. This sentiment is expressed particularly strongly by carers of children with FHS, who are particularly conscious about their child being made to feel 'different'.

This 'normal' that FHS consumers desire is defined by:

- Not feeling like an outlier or like they are 'causing a fuss', especially when eating out in a large group
- Not having to discuss requirements with staff
- Not having to be provided with a different menu or more detailed information after they / their group has been provided with the main menu

To facilitate a 'normal' experience, FHS consumers express a preference for written information – ideally on the main menu or provided at the first touchpoint when entering a food business, allowing them to make a decision about what to eat in the same way as non-FHS consumers, while also making them feel that they are equipped with enough information to make an allergy safe choice.

"I don't like to go up and ask [...] Just seems like it makes it a big issue, so I do really like it when the signs are clear and you can just pick and choose like someone on a normal diet."

Moderate allergy, Female, 31-50

"The only 100% positive experience we ever have is eating at Pizza Express as they serve a total gluten free menu. Oliver feels like he's 'normal' and eats what he likes. He has a choice on the menu!! Having choice is very limited for coeliacs and to go to a restaurant and be able to choose from multiple items is really positive, especially for children."

Coeliac (Parent), Female, 31-50

On the other hand, for FBOs, providing a positive experience is about one that is tailored to the FHS customer's requirements and, above all else, that is safe. They therefore want to put in place measures which disrupt the flow of the 'normal' non-FHS experience to ensure that any FHS requirements are properly surfaced and

understood. From the FBO perspective, there are often substantial 'behind-the-scenes' changes that need to take place in order to accommodate an allergy, which are different from normal processes, and of which FHS consumers are usually unaware. Therefore, FBOs would like to have more conversations with customers around allergies. FBOs desire to take additional steps to ensure customers' safety can sit at odds with FHS consumers' desire for a 'normal' experience.

"How can you make them [an FHS consumer] feel normal? I'd have to ignore their [FHS] which could be fatal to them."

Owner, Takeaway (Independent), <9 employees, England (Suburban)

"I think if push comes to shove, when people express the desire to feel normal, there's this subtext which says 'and be as safe as I would be eating at home' and the trouble is, you can't have both because there are risks associated with eating out of home which don't exist at home."

Head of Quality Assurance, Restaurant (National chain), >250 employees, England (Urban)

"It stretches out how much you have to do when you have a customer with an allergy – the care you have to take, opening new sauces for example."

General Manager, Pub (National chain), >250 employees, England (Urban)

The belief that the FHS consumer knows their allergy best

Both FBOs and FHS consumers believe that the FHS consumer has the best knowledge and understanding of their hypersensitivities and is therefore best placed to make decisions about what they can and cannot eat. For both audiences, the idea of arming FHS consumers with all of the necessary information to make an informed decision themselves is something to aspire to.

Despite this, FBOs have concerns about consumers making safe choices, and want to minimise the possibility of consumers misinterpreting or misreading menu information, or assuming that removing an ingredient from a dish does not necessarily remove the overall risk (because of the risk of cross-contact). They feel they have an important role to play in steering customers to the most suitable

choices in order to avoid them inadvertently ordering something allergenic, and potentially placing this blame on the FBO.

“[Verbal communication] is a good way to stop people from ordering those items. If you have it written down [...] people may misinterpret it and order the item [...] The emphasis is on our company to stop them. Whereas the other way round, the emphasis is on them, to understand the menu, understand the symbols... It’s a lot for them to take in.”

Operations Manager, Restaurant (Local chain), >250 employees, England (Urban)

On the other hand, one of the biggest frustrations faced by FHS consumers is having their menu options limited by a business, and in particular being told what they can and cannot order. FHS consumers want to feel they have control and autonomy over their decisions when choosing food, and do not want to feel even more restricted than their allergy already necessitates by businesses who they perceive are always assuming they are dealing with the worst case scenario. For this reason, while they are usually open to being ‘pointed in the right direction’ by staff, they respond poorly to a firmer approach. Additionally, some FHS consumers tend not to be aware of the reasons why a business may need to ask them about their allergies, and the behind-the-scenes chain of events that takes place once an allergy has been disclosed, meaning being asked can feel like an unnecessary inconvenience.

Industry trade bodies point out that consumers see allergies from an **ingredient** perspective, whereas food businesses see allergies from a **process** perspective. Consumers – particularly those with mild or moderate FHS – believe that if they are able to remove an ingredient from a dish, it becomes free from that allergen, but businesses know that if consumers do not inform the establishment about the allergy, the correct processes may not be followed. They believe that dialogue between consumers and food businesses is therefore critically important.

“[A negative experience involves] being denied food you know you can eat! I can eat cooked eggs but was denied a hash brown because it contained egg. I even asked them to speak to the chef as I suspected a lack of training for waiting staff but was told the same!”

Severe Allergy, Female, 31-50

“Consumers see allergies from an ingredients perspective, but businesses see allergies from a process perspective.”

Stakeholder, Trade Association

Standardisation and clarity over responsibility

Consumers and FBOs alike express a desire for more standardisation and clarity in approaches to allergen information to aid understanding across the board. For consumers, this is typically expressed through wanting to see a consistent approach to signifying allergens on menus, such as through using the same symbols or colours for different allergens across businesses. FBOs are looking for clarity on what the ‘best-in-class’ process looks like, and exactly where their responsibilities lie. Moreover, multiple FBOs express that they would like their allergen processes to be audited to help them feel confident they are doing the right things.

Both consumers and FBOs also highlight that they want businesses to be able to maintain a degree of flexibility and individualism (for example, in menu design) which contributes to the customer experience. They do not see standardisation as necessarily meaning a one-size-fits-all approach.

“What would be good is to make a universal template, so the whole country uses the same colour code. For example, have the dairy symbol in white... We’d get used to that colour code.”

Co-owner, Caterer (Independent), <9 employees, England (Urban)

“For me, allergy information could be improved with more consistency from venue to venue...a basic standard of the allergen matrix.”

General Manager, Restaurant (Independent), 50 – 249 employees, England (Urban)

“I’m surprised by the lack of standardisation, which makes it confusing when you go to different places. Even vegan and vegetarian are displayed differently in different places!”

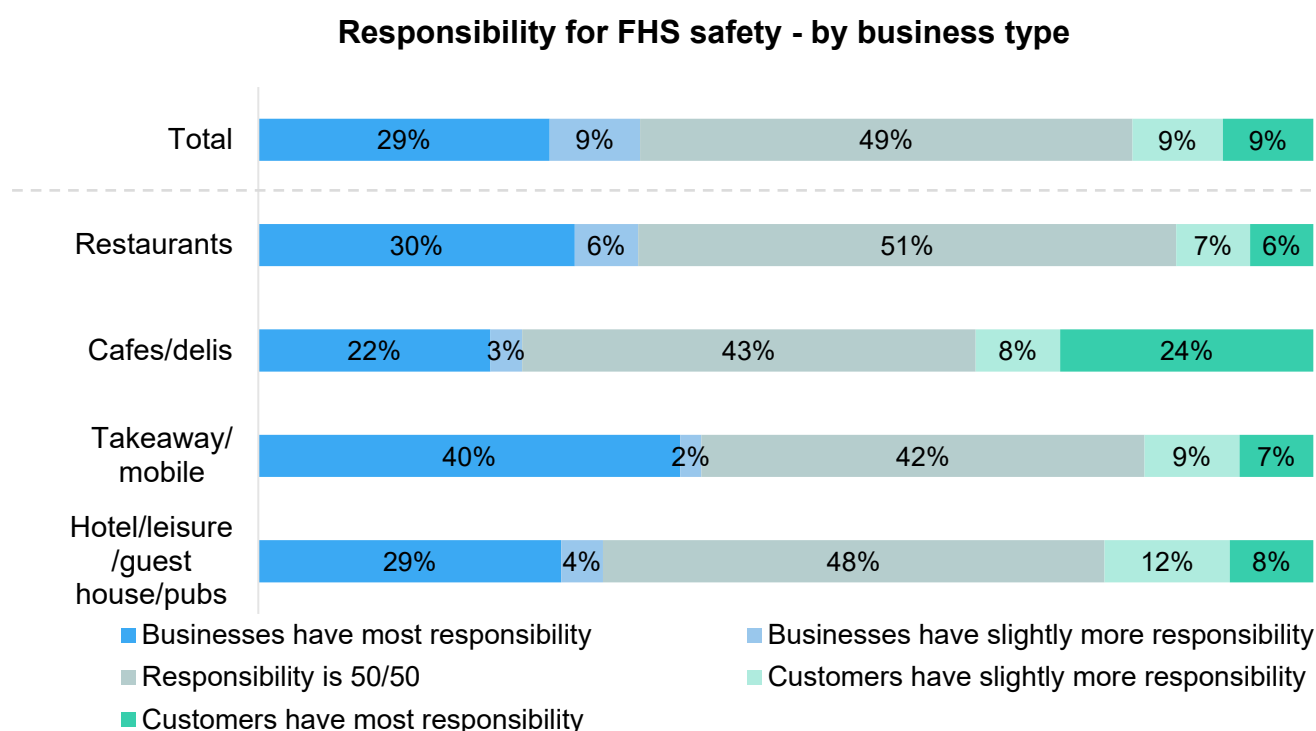
Moderate Allergy (Parent), Female, 31-50

Within this idea of a standardised approach is the desire for greater clarity over where the responsibility for surfacing FHS requirements lies, and there is a tension between the expectations of FBOs and consumers here.

In the quantitative survey, half (49%) of businesses think that responsibility for keeping FHS consumers safe is currently split 50:50, and a sizeable proportion (29%) think that the responsibility currently lies mostly with the business rather than the consumer.

However, interestingly, qualitatively we heard more businesses say spontaneously that they feel the responsibility should ultimately lie with the consumer. This perspective was held by a minority (9%) in the survey.

Figure 3 Responsibility for FHS Safety - split by business type



Base: All respondents (n=402), all restaurants (n=102), all cafes/delis (n=37*), takeaway/mobile food unit (n=43*) and hotel/guest house/leisure etc. (n=182) *small base size.

If we look at this in more detail qualitatively, businesses and industry trade bodies feel firmly that it is the responsibility of the FHS consumer to disclose any allergies or intolerances themselves without being prompted, and in many instances FBOs simply expect this will happen. FBOs instead see their role as providing detailed, accurate information and a carefully managed process once an allergy has been mentioned, and are generally uncomfortable with the idea of businesses or staff holding ultimate responsibility for allergies or intolerances being raised.

"Split responsibility 50:50 rather than putting it 100% on restaurants or food providers. You are just as responsible for informing businesses about allergies as they are to provide you with an allergy free meal."

Deputy General Manager, Pub (National chain), >250 employees, England (Urban)

"Consumers need to take responsibility for their health and safety."

Stakeholder, Trade Association

"The more prepared an establishment is to deal with an allergy, the less of a fuss they have to make, so it's win win for everyone."

Stakeholder, Trade Association

On the other hand, FHS consumers reject the idea of putting the onus entirely on them. In particular, they dislike 'catch-all' disclaimers on menus, as opposed to allergen labelling, as they see this as businesses shirking responsibility and 'passing the buck' to the consumer. They also feel this forces them into conversations with staff which they may not want to have and may lead to them having to sign disclaimers, which again feels like all responsibility is being placed on them.

This difference between the quantitative and qualitative findings may in part be due to the methodology used. The quantitative FBO view is more instinctive, and reflective of a gut reaction – i.e. if I find out a customer has an allergy, it's my responsibility to keep them safe. But when FBOs considered this more closely in the qualitative interviews, they are more likely to see a difference between the responsibility to keep consumers safe (their responsibility) and the responsibility for bringing an allergy to their attention in the first place (the consumer's responsibility).

Interestingly, this chimes with what also became apparent qualitatively – that there is a split in the type of responsibility that the FBOs and consumers have. For consumers, their responsibility is to inform the business of their FHS needs and to have knowledge about what they can or cannot have. Whereas for businesses, their responsibility is for the processes and steps they take to manage and accommodate the FHS needs.

"An [allergy notice] is fine, but it's almost so obvious it doesn't really help. It puts the onus on the customer. It's better than nothing."

Severe Allergy, Male, 18-30

“I had to sign a disclaimer. I haven’t been back since. It was so awkward. There was a shock element to it.”

Coeliac, Male, 18-30

Synergies and Tensions – In Conclusion

Despite the synergies between FBOs and FHS consumers in their attitudes towards allergen information, the resulting tensions mean it is worth exploring each audience separately to further unpick these points of difference which the FSA will need to navigate, and to build a detailed picture of the drivers and barriers of each of these key groups.

6. FBO approaches to allergen information

Key Findings

1. **Four key business types have been identified, in terms of how FHS requirements are managed.** These types are based on business *behaviour* – for example, the degree to which a business takes a fixed or flexible approach to allergies; and their attitude – for example, the degree to which key decision makers are engaged with FHS:

- **Fixed approach; higher engagement businesses:** proactive businesses, with well-trained staff and lots of allergen information available to customers, but also risk averse in ways that can make consumers feel they are having a poorer experience (for example, having to sign disclaimers).
- **Fixed approach; lower engagement businesses:** least motivated to address FHS, often due to not encountering many FHS customers, and provide very limited information (for example, no or minimal menu labelling).
- **Flexible approach; higher engagement:** proactive businesses with knowledgeable and engaged staff who work with customers to adapt dishes to suit their needs, with a focus on the customer experience.
- **Flexible approach; lower engagement businesses:** more reactive in approaches to allergen information, with some ability to adapt dishes to suit FHS consumer needs, within reason.

The category a business falls in to influences the preferences and needs of businesses when it comes to providing allergen information.

2. **Businesses are adopting different methods to uncover and address FHS requirements.** Although there is no particular method being used by a majority, there are some approaches used with slightly more frequency across different business types:

- a. Encouraging communication between customers and staff
- b. Basic menu labelling

- c. Separate and more detailed allergen information that supports the main menu
- d. Reviewing allergen information as and when there is a menu change

- 3. The scale and size of a business can influence approaches to FHS requirements.** National chains are more likely to have multiple venues and a central head-office function, meaning their FHS processes tend to be more formalised, and supported by digital allergen management systems. Conversely, smaller, independent businesses are more reliant on specific individuals manually updating allergen information.
- 4. The positioning of a business also has an impact on approaches to FHS requirements.** For example, a traditional pub that prides itself on simple, straightforward, classic food and a consistent menu is less likely to be engaged with FHS than a high-end restaurant offering more complex dishes and a tailored customer experience.
- 5. A higher footfall of FHS consumers creates a virtuous circle whereby businesses are more likely to have better approaches to allergies.** More FHS customers means FHS is more top of mind, causing businesses to take more proactive approaches, which in turn attracts more FHS customers, and so on.

Grouping FBOs by Common Factors

There are two key axes which can be used to define the way in which a business manages FHS requirements.

Flexible vs fixed approach: Some businesses, such as those with smaller menus where dishes are cooked from scratch, can modify dishes more easily, whereas others have larger menus with more options and pre-prepared elements which cannot be easily adapted. Some businesses, such as big chains, are also more likely to be subject to systems and processes which have been put in place via a central corporate headquarters to ensure consistency across sites, and therefore staff are less likely to have the autonomy to make ad hoc changes.

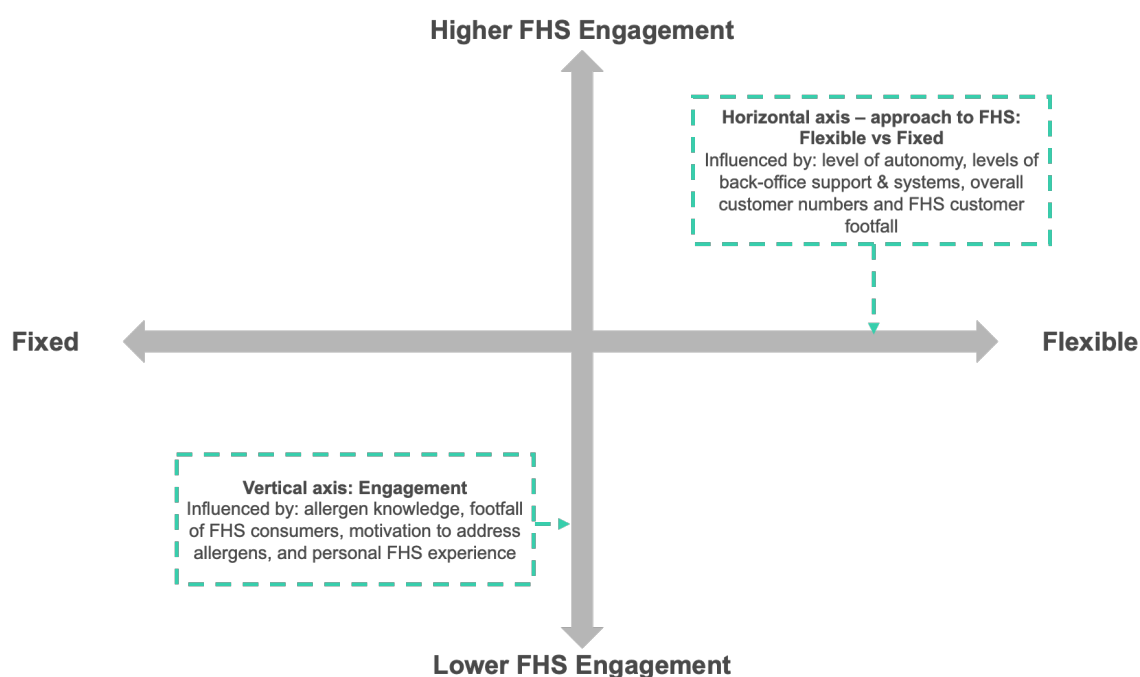
Higher vs lower FHS engagement: Business practices are influenced by the degree to which those responsible for menus and information have awareness, knowledge, or personal experience of FHS with those with more experience more

likely to integrate FHS needs into business practices. This engagement is also influenced by the amount of footfall from FHS consumers that the business gets; those who rarely come across FHS consumers are less likely to put things such as menu labelling in place, whereas those who regularly have FHS consumers are more likely to find ways to improve experiences for FHS consumers.

The horizontal axis 'flexible vs fixed' approach to FHS is influenced by factors such as level of autonomy, extent of back-office support and systems, overall customer numbers and FHS consumer footfall.

The vertical axis 'FHS engagement' is influenced by allergen knowledge, FHS consumer footfall, motivation to address allergens and personal experience of FHS.

Figure 4 Matrix of FBO approaches to allergen information



Each quadrant of the matrix can be typified by their approach to meeting FHS consumer needs.

1. **Fixed and Higher FHS engagement:** Businesses in the top-left quadrant are likely to take a proactive approach to allergen information, have well-trained staff, have lots of information available to consumers and to have policies and processes in place to address FHS. However, these businesses are also likely to be risk adverse, not make substitutions for ingredients and may ask customers to sign disclaimers

2. **Fixed and Lower FHS engagement:** Those in the bottom-left quadrant are least likely to have awareness and motivation to address FHS and are likely to have inflexible menus. They're unlikely to come across many FHS consumers and have no or minimal allergen labelling.
3. **Flexible and Higher FHS engagement:** The top-right quadrant typically have knowledgeable and engaged staff who take a proactive approach and like to work with customers to adapt dishes and ensure the customers enjoy their experience. They are more likely to focus on ingredients lists which can be shared with customers and aid substitutions.
4. **Flexible and Lower FHS engagement:** The bottom-right quadrant are likely to be reactive in their approach to allergen information, typically they have lower FHS customer footfall and lower awareness or motivation to address FHS. However, they know their customers well and can adapt dishes to suit FHS customer needs, within reason.

A summary of these quadrants is in Table 1.

Table 1 Comparison of matrix quadrants

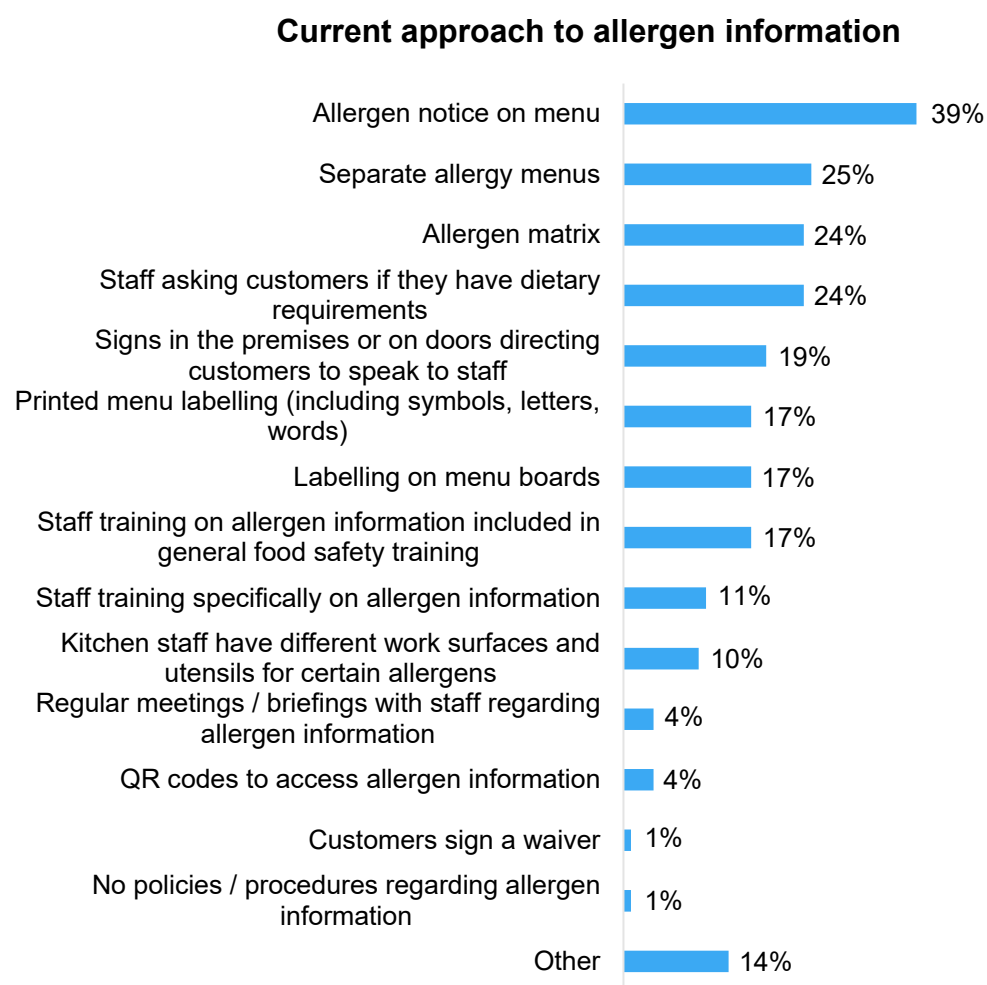
Comparison	Fixed and Higher FHS engagement	Fixed and Lower FHS engagement	Flexible and Higher FHS engagement	Flexible and Lower FHS engagement
Proactive or reactive	Proactive	Reactive	Proactive	Reactive
General attitude towards FHS	Take a serious approach with safety as a primary concern. Shared responsibility with consumers but as they are risk-averse may have consumers sign disclaimers	Their concerns are likely to be protecting their business should anything go wrong. Likely to feel that it is the consumer's responsibility to keep themselves safe	Take a consumer-centric approach with consumer experience at the heart of what they do. Shared responsibility with consumers and accommodate their needs	Care about the consumer experience as they are likely to have regular customers, however due to lower knowledge are likely to adapt as they come across FHS
Customer facing allergen information	Substantial information available either via menus or allergen matrices. Also likely to have digital allergen information	No or minimal labelling with notices to inform staff of allergies. May have back-of-house matrices or packaging if asked	Likely to have ingredients lists which are shared with customers	Basic allergen information on menus and a reliance on conversation with customers and kitchen staff

Comparison	Fixed and Higher FHS engagement	Fixed and Lower FHS engagement	Flexible and Higher FHS engagement	Flexible and Lower FHS engagement
Staff training	Well trained staff and experienced management	No specific training, only what is included in their health and safety or food hygiene courses	Knowledgeable and experienced staff and in some cases staff have specific allergen training	Irregular and informal approach to training
Approach to updating allergen information	Work closely with suppliers to ensure it's up-to-date. Likely to have strict policies in place	Likely to use packaging as and when allergen information is required	Food is often made from scratch, without pre-prepared elements so information about allergens is clear. Otherwise work closely with suppliers	Likely to use supplier lists or packaging for allergens

Overarching common approaches

Qualitatively we heard some broad consistencies between types of business in their approach to allergen information, although there is no one consistent approach across them. This is reflected quantitatively with a few areas of greater commonality, although there is no single approach which is used by a majority.

Figure 5 FBOs current approach to allergen information (unprompted)⁶



Base: All respondents (n=402)

⁶ C3. What is your workplace's current approach to allergen information, including how you communicate allergen information to customers and any policies and procedures you have in place to cater for food allergies, intolerances or coeliac? Interviewer did not read out options – unprompted responses were coded against these options.

Businesses which are part of a chain are more likely to take more proactive approaches than independent businesses. Chains are more likely than independents to have separate allergy menus (31% compared with 21%), have staff training (28% compared with 20%) and have staff ask customers if they have dietary requirements (26% compared with 23%).

Despite these differences between businesses, and the fact that there is no 'one-size-fits-all' process for allergen information, there are a few overarching approaches that are consistent among many FBOs:

1. Communication is key
2. Labelling the menu with three or four key symbols (such as vegan, vegetarian and gluten free, and occasionally contains nuts) is standard
3. Supporting basic labelling with other detailed information
4. Allergen information is reviewed when there is a menu change

Communication is Key

In some businesses, there is a three-way, triangular process – 'consumer' to 'front-of-house staff,' 'front-of-house staff' to 'kitchen', 'kitchen' to 'front-of-house staff', and 'front-of-house staff' back to the 'consumer'. Without this communication flow, mistakes can easily be made.

Qualitatively, the majority of FBOs, express that the most important thing when it comes to allergen information is communication between the customers and staff. Even when there is labelling on the menu or other supporting materials, FBOs prefer direct communication to prevent any mistakes, cross-contamination, or in case customers are unaware that certain parts of the dish they have chosen may contain an allergen.

"My opinion is [that it's best to convey allergen information] verbally. As good as a piece of paper is, and it's got it written down, it's so much easier to talk to someone who knows it. It not only puts the customer at ease but us too – we know from the get go."

Manager, Restaurant (Independent), 50 – 250 Employees, England (Urban)

FBOs take slightly different approaches to how they manage this communication depending on their business type. In businesses where they know the consumers and serve them regularly, they learn what they can and cannot have, over time, and how to substitute ingredients. Examples of this include workplace catering providers and care homes, where menus may be adapted to FHS consumers' needs. On the other hand, in some restaurant settings, specific staff take ownership of communication, for example having a dedicated role with a number of 'allergen champions'. These people would take over serving any table where someone has an allergy or intolerance, go through the dishes on the menu with the consumers, and then communicate with the kitchen staff.

Central to communication is the role of front-of-house staff. In restaurants, pubs and cafes, staff are usually trained in what is on the menu and any allergens present, as well as being trained to double check allergens with the kitchen before confirming orders with customers. In some businesses with more proactive approaches to allergy information, prompts and additional measures are used to remind staff of this step. This may include allergen information next to or digitally held on the till, buttons on the till which send allergy information through to the kitchen, or tick boxes on order pads to remind staff to ask about allergies.

"[In the training,] they would have to look at the menu, [they are] talked through the menu as part of their training. When the menu changes there's a team briefing. First point of reference is the menu, then senior members of staff."

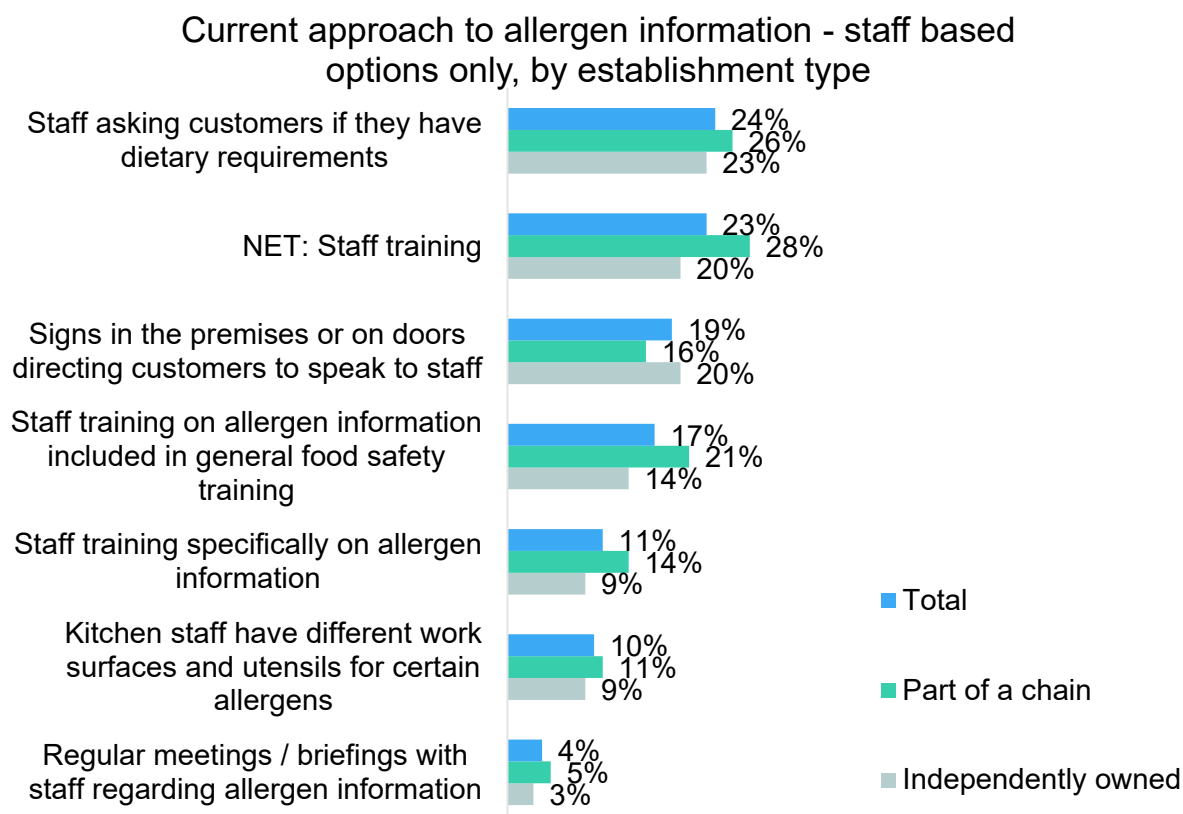
Head of Quality Assurance, Café (Independent), >250 Employees, Northern Ireland (Suburban)

Whilst staff play an important role in the communication and management of allergen information, the degree to which they are trained is mixed across businesses. Just under a quarter (23%) of FBOs report unprompted that they have staff training as part of their current approach, with this more likely among chains than independently owned businesses (28% compared with 20%).

When asked specifically about training on FHS, the number of those saying their business provides training increases to half (52%) of all FBOs surveyed who report having face-to-face training from their company, and two in five (39%) report having e-learning from their company. However, the types of training vary by establishments. In some smaller restaurants and cafes, service staff are taken

through the menu by managers to familiarise them with the dishes. Larger businesses are likely to reference more formalised and compulsory food hygiene and health and safety training for their employees, with training on FHS forming part of this process. This is reflected in the quantitative research with likelihood of having e-learning from their company increasing with the number of employees (69% of those with >250 employees compare with 14% of those with <9 employees). Some businesses, often those that are supported by a corporate arm, refer to ongoing, compulsory training for staff which is tracked and monitored. In specialist settings like care homes, staff have general medical training on allergies and allergic reactions.

Figure 6 Current approach to allergen information (unprompted) - staff based options – by establishment type⁷



⁷ C3. What is your workplace's current approach to allergen information, including how you communicate allergen information to customers and any policies and procedures you have in place to cater for food allergies, intolerances or coeliac?

Base: All respondents (n=402), all FBOs whose establishment is independent (n=232), or part of a local or national chain (n=166).

Regardless of the level of training, in many cases, even where staff are knowledgeable they are still expected to talk to kitchen staff and double check about any allergens in dishes, as well as ensuring chefs are informed.

“Communication I think is the big one. Whenever we work in restaurants, the kitchen communicates with the front of house [about allergens].”

Other (Caterer, Independent), 10-49 employees, England (Urban)

Labelling the main menu with three or four key symbols is standard

The majority of businesses in the qualitative research label Vegetarian (V), Vegan (VG) and Gluten-free (GF) on their printed and digital menus and menu boards, with many also indicating nut-free (NF) or Dairy-free (DF). This is then supported by an allergen notice asking customers to tell staff about any other allergies.

Some businesses use vegan as a proxy for dairy-free – this sits at odds with the preferences of the dairy allergic and intolerant consumers who express dissatisfaction with having their FHS conflated with veganism as it limits their options.

The majority of businesses express a reluctance to add more detail to menus due to concerns about ‘overcrowding’ and illegibility, which could detract from the customer experience for FHS and non-FHS consumers alike.

Supporting basic menu labelling with other detailed information

Listing allergens on menus is often supported with other, detailed information about the ingredients or allergens in dishes. Typically, this is a detailed allergen matrix (digital or paper) that can be accessed for additional information. A quarter (24%) of businesses report using an allergen matrix. In larger establishments, this is often designed to be customer facing. More frequently, and particularly in smaller establishments, it is intended as a resource for staff to refer to.

Interviewer did not read out options – unprompted responses were coded against these options.

Where some elements of the dishes are pre-prepared, most businesses would use supplier information or packaging to work out allergen information, which is then used to manually fill in matrices and ingredients lists.

Small businesses are more likely to refer to the packaging as and when questions about allergens arise. By contrast, larger businesses may have systems in place that link to supplier information, enabling some ingredients information to be updated automatically; similarly, for businesses that are part of chains with a corporate arm, information is usually updated centrally.

Chain restaurants and other large businesses are also more likely to only use branded products to ensure they have more certainty in the accuracy of the information, as the suppliers are more likely to have done their due diligence and follow similar processes to them.

“We have to buy branded. They follow safety protocols as we do as a brand and get audited.”

General Manager, Restaurant (National chain), >250 employees, Wales, Urban

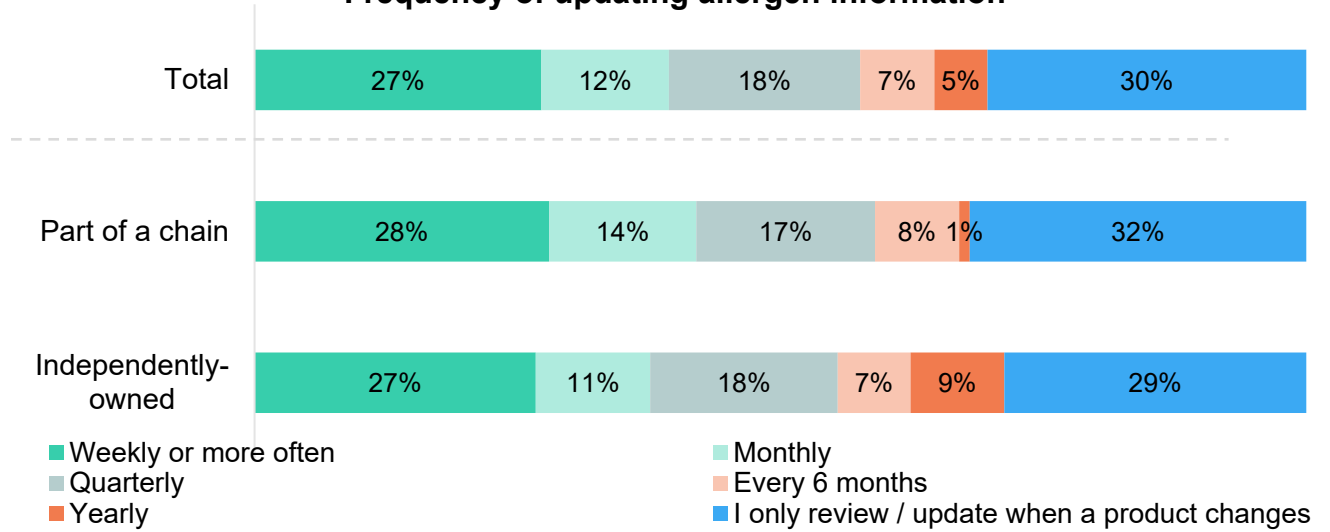
Allergen information is reviewed when there is a menu change

From the quantitative survey, three in ten (30%) report only reviewing or updating allergen information when a product changes and over a quarter (27%) report doing so weekly or more often. Independents are significantly more likely than chains to report that they review or update allergen information yearly (9% compared with 1%).

Figure 7 Frequency of updating allergen information⁸

⁸ K1. How often do you review or update your allergen information?

Frequency of updating allergen information



Base: All respondents (n=402), all FBOs whose establishment is independent (n=232), or part of a local or national chain (n=166).

Regardless of how frequently they report updating allergen information, businesses typically feel that they are reviewing allergen information frequently enough for this information to be accurate and up to date. Qualitatively, businesses mention primarily reviewing and updating allergen information when there are changes or updates to the menu, but not more frequently than that. A sizeable proportion of the quantitative FBO sample also report only updating allergen information when products change. However, compared with the qualitative research, a greater number of businesses when prompted in the quantitative survey describe a more regular pattern of updating allergen information, with over a quarter saying they do this weekly.

Among business who update information when a menu or product changes, details are updated on menus and allergen matrices when dishes are designed and agreed. They then remain as they are until the dishes on the menu are changed, or substitutions are made. Consistent with this, when asked what prompts changes to allergen information two thirds (65%) of businesses in the quantitative survey say they are prompted by changes in the menu.⁹ In particular, chefs are significantly

⁹ K2. What sorts of things prompt changes to allergen information in your business?

more likely than those in management roles to be prompted by changes in the menu (72% compared with 58%).

Outside of wider menu changes, another circumstance when allergen information may be updated is when ingredient substitutions are necessary. Close to half (47%) of businesses in the quantitative survey are prompted by a change of supplier or supplied ingredients, the second most common prompt for changes to allergen information. Qualitatively we heard some businesses choose to ban substitutions, and instead dishes are removed from the menu if an ingredient runs out. For businesses where substitutions are allowed, either the menu or allergen matrix is updated in real time, or where this isn't possible customers are informed verbally by front-of-house staff. Further, in some chain restaurants, to avoid needing to update allergen information, there are approved suppliers for substitutions where ingredients and allergen information has already been checked and is equivalent to the usual products.

"We are sure to pull the product so say, for example, we have a Caesar sauce and they've got an additional allergen in there, then we can make the choice to update the menus and change information, or we can reject the sauce and try and get a version without that additional allergen."

Head of Quality Assurance, Café (Local chain), >250 employees, Northern Ireland (Suburban)

Whilst methods of updating the allergen information differ, in the qualitative research there are consistent themes in what FBOs find helpful when there are changes to dishes, or to specific elements. On the whole, businesses using pre-made elements rely on having clearly labelled packaging. Some businesses using pre-made elements (for example, curry pastes) check packaging more regularly and are particularly alert to language like 'new improved taste' which could indicate a change in ingredients (this is particularly true where staff have had more formal training on allergens in past, for example through working in a big, national chain, and are therefore aware of particular clues or cues which may indicate allergy information requires updating).

In the interviews we heard that businesses also like to have a digital source to refer to, whether this be provided from their corporate arm, or a link to their suppliers' product information. This allows businesses to be able to check the information quickly and easily and, in some cases, makes them feel that it is more likely to be up-to-date as any changes will show in real time.

“The most helpful is [a particular supplier]. They put all of their allergen information on their website so when you're doing the dishes you can click on the item, click on the allergen and it'll tell you right there and then.”

Head Chef, Restaurant (Local chain), 10-49 employees, England (Urban)

Whilst food businesses in both the qualitative and quantitative research indicate that they are updating the allergen information, only 20% of respondents in the quantitative survey are providing this information on printed menus. The data does not explore in detail the practicalities of conveying these updates to consumers in a timely manner where multiple copies of the menu, potentially across multiple sites, need to be updated in real time.

Contextual influences on approach

Every food business is different. Across the research, a range of different attitudes and processes for managing allergen information were shared by FBOs. These were driven in part by the contextual factors identified in section 5 of this report, but also by the nature of the business itself and the attitudes of the owner and management team.

We have identified a number of FBO specific factors that shape and add nuance to business' approaches to allergen information, and drive differences across business.

Scale, size, and positioning of business and menu

Larger businesses with multiple venues are most likely to be taking a proactive approach to allergens and to be factoring this into their broader business strategies. These businesses typically have longer menus with more options, with menus applying across multiple locations, requiring highly formalised (and often digitised) processes to ensure staff and customers can easily access detailed allergen

information. Examples of this include using online systems like Nutritics to keep allergen information updated, and centralised systems for bigger national chains.

“We use a system called Nutritics. We put all the menus and ingredients onto Nutritics and it displays a matrix chart [...] You can change anything quite quickly – if something is not working you can change the dish [...] I think most big companies probably do use these systems now.”

Development Chef, Institution (Independent), >250 employees, England (Urban)

Businesses which have shorter, simpler menus can rely on more informal allergen processes – for example, matrices that are kept back of house and updated and speaking with the kitchen – as staff have greater oversight and knowledge of the menu.

“In the book we have an ingredients list for each dish, any of 14 allergens are in bold. We only look if people ask [...] There's a large sign above the bar saying please ask us about allergens, that's on every bar. But we don't proactively tell people the ingredients of everything they order.”

Licensee, Leisure/entertainment (Independent), <9 employees, England (Urban)

The positioning of a business – for example, the type of food and atmosphere it aims to convey, and the clientele it seeks to attract – also influences the approaches taken towards allergen information. For businesses which are focused on ‘simple’ and ‘straightforward’ food and experiences (for example, traditional pubs, cafes, sandwich shops), allergen information is likely to be less top of mind, and can feel at odds with this sort of positioning. On the other hand, businesses which place an emphasis on more complex dishes and ingredients, and on a more tailored customer experience, are likely to embrace allergen information requirements more warmly and to be proactive in how these are approached.

"It's more of a culture approach rather than a business approach. We have a particular way we like to interact with guests, going that extra mile, making them feel totally relaxed – so it's part of that, rather than bombarding them with that information."

Group Purchasing Manager, Hotel/guest house (National chain), >250 employees, England (Rural)

Perceived likelihood of FHS customers visiting the business

A higher turnover of customers increases the likelihood of encountering an FHS customer, and therefore makes allergy information a more top of mind consideration. Larger, urban businesses (such as high street chains), as well as places like canteens, are most likely to see a higher turnover of customers, which increases the risk of an allergy related issue; these businesses therefore often take a very proactive approach to allergen information.

By contrast, some smaller, independent businesses, with lower footfall and a greater proportion of regular customers, have limited experience of serving FHS consumers meaning allergen requirements are less top of mind. For example, among local pubs, cafes, and restaurants, as well as some institutions such as schools, who typically encounter the same customers, the likelihood of needing to cater for unexpected allergies is less of a day-to-day occurrence. In these businesses, any allergies among regular customers will be well-known, and processes around dealing with these customers may therefore be less formal (for example, feeling they do not need to ask about allergies on every visit).

There appears to be a 'virtuous circle' effect whereby FHS businesses which encounter FHS consumers more regularly are more likely to adapt their menus and processes to meet the needs of these customers, which in turn attracts more FHS customers. Conversely, businesses who encounter fewer FHS consumers are less likely to take such proactive approaches, and therefore less likely to attract FHS consumers in the future. Reflecting the impact of awareness, those who receive more frequent visits from FHS customers are more likely to feel that they are doing

more than other businesses¹⁰ (70% of businesses who have FHS customers at least once a month compared with 40% who have FHS customers less than once a month¹¹).

“If you request [the allergen information], the server looks at the folder. We’ve never actually been asked [...] our customers are all the same customers every time, they just come in and the server says ‘usual?’”

Owner, Deli (Independent), 10-49 employees, Northern Ireland (Urban)

“People are thankful that the signs up on the wall. Maybe might attract new customers if we had labelling on the menu.”

Owner, Takeaway (Independent), 50-249 employees, Northern Ireland (Rural)

“Particularly where we are right now, it seems to be quite rife... We’re quite a health-conscious cafe so we get a lot of people, more on the intolerance side than the allergy side who are quite picky about what food they have. I’d say we don’t go a day without at least a few people.”

Owner, Cafe (Independent), 10-49 employees, England (Urban)

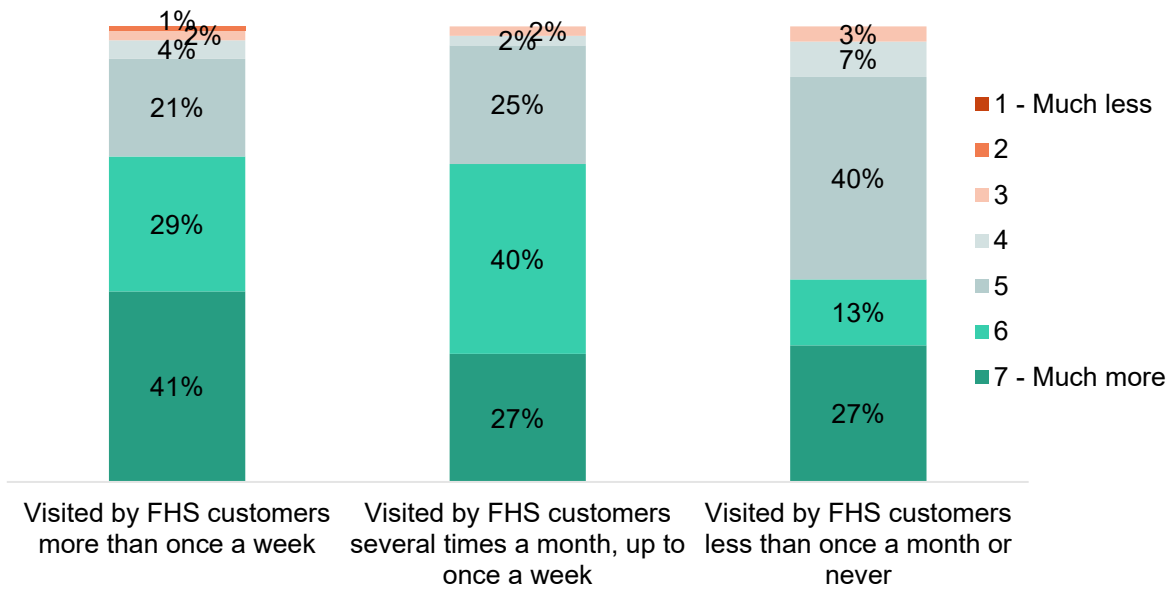
Figure 8 Self-reported engagement - split by frequency of FHS customers¹²

¹⁰ Giving a rating of 6-7 on a scale of 1-7. QC2. How often do customers with food allergies, intolerances or coeliac disease visit your workplace?

¹¹ Small base size of 30 for those who have FHS customers less than once a month

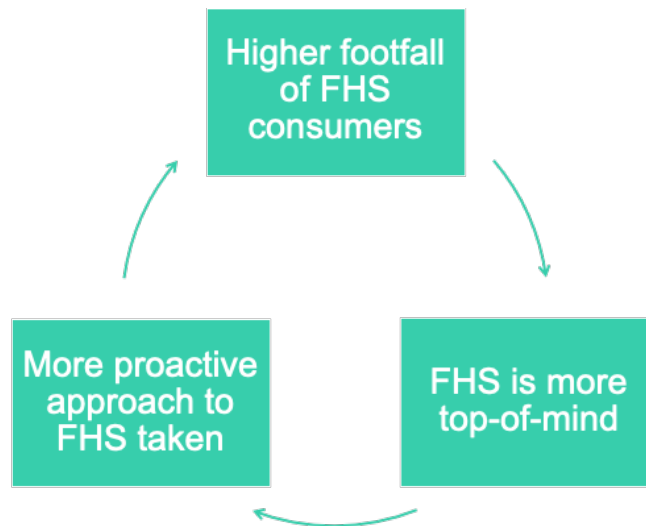
¹² C1. On a scale from 1-7, where 1 is “The business is doing much less than others in the industry” and 7 is “the business is doing much more than others in the industry”, compared to other businesses in the food and beverage industry, how engaged do you think your workplace is with allergies, intolerance and coeliac disease information?

Engagement with FHS compared with others in the industry - by frequency of FHS customers



Base: FBOs whose establishment is visited by FHS consumers more than once a week (n=324), several times a month up to once a week (n=48*), and less than once a month (n=30*). *small base size.

Figure 9 Diagram highlighting correlation between high FHS customer footfall on FHS approaches



Personal experience with FHS

A pattern that came through strongly in the qualitative interviews, but which was less apparent in the quantitative survey, was that FBO decision makers with personal experience of FHS typically take more proactive approaches to allergy information.

They are more likely to be aware of different allergies, and to be more empathetic to the needs of FHS customers.

Examples of those with direct FHS experience taking a more proactive approach to allergen information include:

- The owner of a small, independent café in urban England whose wife is coeliac, who has redesigned his order pad with tick boxes for allergens to prompt staff and ensure there is no confusion
- The owner of a small, independent café in rural Northern Ireland whose children have severe milk and egg allergies, and who therefore tries to provide alternative products of equal quality and price
- The Deputy General Manager of a pub that is part of a national chain who wants to create a policy in her business of staff asking all customers about allergies as her daughter has an allergy that is not in the top 14

“I take it seriously. My father-in-law and brother-in-law have sesame allergies. I’ve seen them have a reaction when eating a Chinese takeaway... They had pustules on their skin and their faces swelled up. 10 years ago that happened, and it changed my thinking about allergens. I realised it’s not just people doing it for a trend.”

Executive Chef, Hotel (National chain), >250 employees, England (Urban)

Conversely, some FBO decision makers who do not have this personal experience, and who do not encounter allergies so often in their workplaces, can lack awareness and understanding of allergies, and are therefore less likely to put in place proactive measures, for example:

- A Venue Manager for a bar in Wales who feels that the menu (all pizza) at his workplace is ‘self-explanatory’
- The owner of an independent takeaway in Northern Ireland who does not currently display allergens on the menu because it is his father’s business which has been running for 20-25 years, and practices haven’t been updated
- An Assistant Manager for an independent pub in an urban area of England who feels that allergen information is a bit of a ‘fuss’ for the pub-grub they serve

"I'm sure half the allergy names they've got they make up. Pescatarian – sounds like a star sign."

Assistant Manager, Pub (Independent), 10-49 employees, England (Urban)

"We actually don't have any information [on the menu]. Our menu is very small and it's quite self-explanatory. It's pretty straightforward – it's all pizza."

Venue Manager, Bar (Local Chain), 10-49 employees, Wales (Urban)

Pen portraits of FBOs

FBOs from our sample typically sit on the allergen approach matrix according to the type of business that they are, with high end businesses likely to be very flexible and engaged and small takeaways or mobile food businesses likely to have low FHS engagement and be fixed in their approach. The position of different business types is shown in Figure 10.

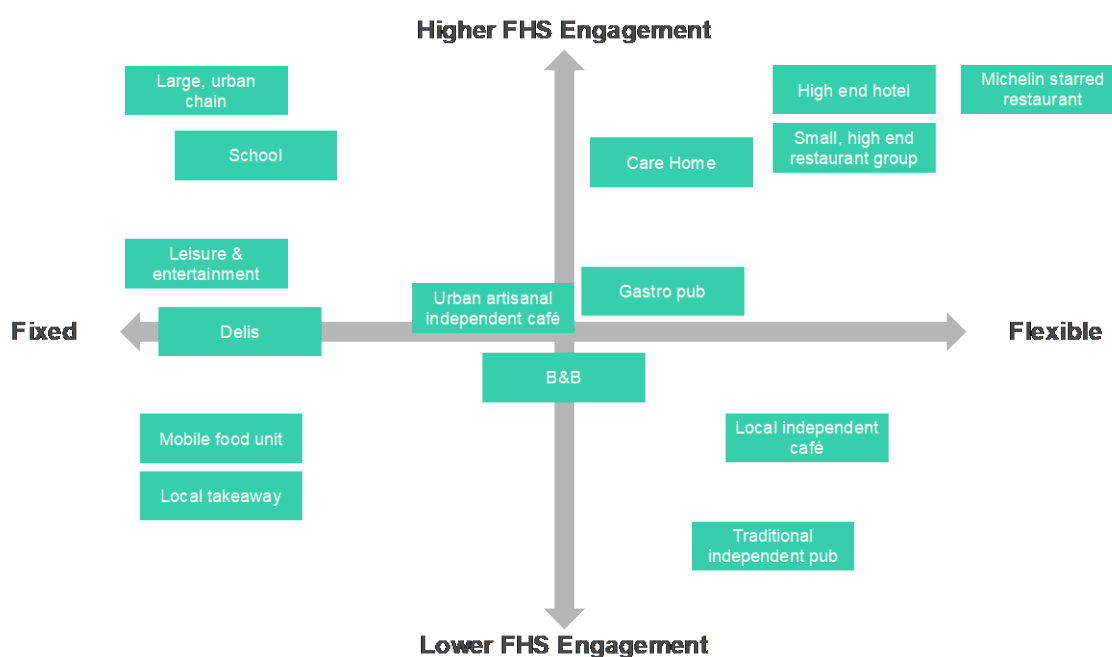


Figure 10 Where FBOs typically sit on the allergen approach matrix

To illustrate the approaches of these businesses, below are pen portraits for each quadrant of the matrix.

7. Fixed and Higher FHS Engagement

Kishan works as a manager in a restaurant of a national chain. Like all restaurants in the chain, they have a strict allergen policy, which begins with servers verbally asking customers about any dietary requirements.

An FHS customer would be identified when an order is being taken by a member of waiting staff, who would pause the order for the entire party (even if only one customer in the group had FHS) and move their service over to the manager.

Kishan, or another manager would then arrive at the table with an iPad. This would hold an electronic allergen matrix, displaying dishes with a table of the top 14 allergens, indicating which allergens are contained in an individual dish. Using this, Kishan would determine if the customer can eat the dish and process their order – along with those of the other guests in their party, reminding them not to share any dishes if these contain the FHS customer's allergen. If required, communal sauces would be removed from the table.

After ordering, there are additional steps in Kishan's chain to ensure the correct food is delivered to the FHS customer. Firstly, their paper placemat would be marked – with an A and two coloured stickers on either side (in case the placemat is turned over). The FHS meal is prepared by the most responsible person in the kitchen, who is verbally informed by Kishan that the dish is for an FHS customer. In addition to this, the meal would be highlighted in purple on their electronic ordering system. The head chef would use a separate area for preparation of the meal, and the manager who would deliver the meal would take precautions such as washing their hands, all to minimise the risks of cross-contamination.

The allergen information Kishan and other chains receive is provided to them directly by the menu development department. There is limited need for on-site allergen checking, because they are not allowed to replace out-of-stock items, and suppliers provide notifications of minor changes (for example,, such as replacements being sent) meaning these minor changes are shared in electronic menu updates. Every day before service, managers like Kishan clear all downloads from their iPads to ensure the most up-to-date version of a dish's allergen matrix is displayed. For longer-term changes, such as an update to the menu, the menu development team will hold training with managers to discuss the new menu, what allergen information is included for new and existing dishes. All staff are also given allergy training, which

they must pass, even if they are not in a senior enough position to work with FHS customers.

While Kishan feels this system does work well, never having experienced any incidents, a common request he comes across is modifications to dishes. This is not something they can cater for, and he has experienced customers leaving in the past because he can only ask them to choose a different dish. The chains also do not hold allergen information outside of the top 14, meaning he is similarly limited in the guidance he provides to FHS customers for ingredients outside of these. For example, he would advise a customer with a chicken allergy to order a vegetarian dish, so there is not contamination (for example, in the broth).

Bonnie works for a school catering company. She manages multiple schools, all providing lunches for children aged 4 to 11. After Natasha's Law, they decided to update the way they manage menus and specifically cater for children with FHS. Now, her catering company curate several different menus: one for the children without any FHS needs, menus individually excluding each of the top 14 allergens (for example, a dairy-free menu, a gluten-free menu, etc.), and a menu excluding all of the top 14 allergens (an 'allergy aware' menu). Menus are updated once every six months.

Before children can be provided with any food at the schools Bonnie caters for, parents must complete an online form to indicate any allergies their child has. Once this has been completed and children can be fed in school, parents will be electronically sent a menu before the school day, for children to choose what option they would like to have. The menus sent to FHS children will depend on what or how many allergens they need to exclude: they will either be sent an individual allergen menu (for example, just dairy-free, just gluten-free, etc.) or the 'allergy aware' menu if they need more than one ingredient excluded (even if it is not all 14).

In most cases, Bonnie finds this method works well, ensuring children are only provided with options that they can have. However, she finds some parents do have concerns around the options available – in particular, where a child has more than one allergy, and they are just provided with the 'allergy aware' menu. One example was a child with multiple FHS needs not being able to order pizza, because this was not an option on the 'allergy aware' menu. While Bonnie most often refuses to make amendments for fear of cross-contamination, on the rare occasions she does, she

will provide a form for parents to sign confirming they have reviewed and consent to the change in the menu. Bonnie will also sometimes refuse to serve children at all if their allergens fall outside the 14 regulated allergens because it is not viable to create bespoke menus that cater for their needs. In these cases, she feels it is safer for their parents to provide the children with packed lunches.

There have been some incidents of processes failing in Bonnie's schools. The two causes have been, the individual school's systems and staff failures.

Each of Bonnie's schools has a slightly different system for identifying FHS children to their caterers – with examples including bringing these children in first to collect their food, or having children wear coloured armbands depending on what meal they need. One issue arose from a school wishing not to make a child feel different, and so giving them the same colour armband as their classmates – leading the caterer to provide the wrong dish, and the child to have a reaction.

On another occasion, an FHS child had a reaction following errors made by the caterer making the dishes. Bonnie has processes in place to prevent cross-contamination or accidents – including separate storage, preparation and cooking areas, alerting caterers to last-minute changes to ingredients via Teams, and caterers knowing they must double-check ingredient labels if a delivery has an unexpected replacement. However, at one school, a caterer did not check the labels when an unexpected replacement was made, and therefore did not see it now contained an allergen. An FHS child was provided the dish they had chosen, now containing an allergen, and had a reaction. In the investigation following this incident, the caterer in question was fired.

8. Fixed and Lower FHS Engagement

Stanley and his friend opened a small Italian-American sandwich and coffee bar in the last year. Through social media marketing, their business has really grown, and they're planning to open a new branch this year.

Currently, they only have a menu board with the six sandwiches they are offering at that time. The menu board indicates whether a dish is vegetarian or vegan, as well as its ingredients (but does not include symbols for allergens). Allergen information would mostly be shared verbally. Stanley works to ensure all of his staff are welcoming and friendly, with customers told 'if they have any questions, please ask'

when they enter the shop. They currently don't have a sign to this effect in the shop, but Stanley is planning to put one up soon.

If a customer did raise questions, waiting staff would check whether these were FHS needs or if it was just a preference. Of the allergens they are asked about, gluten and nut free products are the most commonly asked for – although they cannot supply gluten-free items, because their supplier (an artisan bakery) cannot promise gluten-free bread.

Stanley has a staff-facing allergen matrix sheet, which includes information on the top 14 allergens in the bread as well as in the individual sandwiches. This matrix is updated by hand every time they change the menu, which happens quite regularly, and to reflect any substitutions. Last minute changes are uncommon, however: they usually rely on the same suppliers, or purchase additional from supermarkets that contain the same allergens. If a last-minute purchase includes new allergens then the matrix is updated – or they opt not to replace the ingredient and mark the affected dish(es) as 'out of stock'.

The sandwich bar also has processes in place for FHS needs when orders are made. Stanley, his friend and two of their chefs studied catering in college, where they learned how to manage FHS food preparation. This includes having a clean and controlled environment in which to prepare the food away from allergens – although this can be challenging, as they work in a small kitchen.

Of all the customers who visit the shop, Stanley only occasionally hears from customers with FHS needs. He thinks these customers don't often come to his business due to not thinking it suitable for them, and he more frequently discusses food preferences such as being vegetarian or vegan.

9. Flexible and Higher FHS Engagement

Aisha works as a purchasing manager at a small, high-end, chain of hotels and spas across the country. As customer experience is central to their business, 'going the extra mile' for FHS consumers is seen as a natural part of their culture. Specifically, rather than relying on allergen labelling on the menu, there is a preference for verbal communication with guests, as this is seen to ensure staff take on the responsibility of food hypersensitivities, allowing guests to relax.

The process for FHS customers begins before they even arrive. When someone makes a reservation online or over the phone, they are asked if there are any FHS requirements that staff should be aware of. This is then included in any correspondence between sales, reception, and restaurant desks. Once seated at the restaurant, servers will ask guests again if there are any FHS requirements. There is also guidance on the menu reminding guests to liaise with the server if they have any allergies. If alerted about an allergy, the server will fully understand the customer's dietary requirements and take note of their preferred dishes. The server will then converse with the chef – who has access to an allergen matrix stored in the kitchen – to adapt the chosen dish and substitute components so that the customer is able to have the dish of their choice without compromising on flavour, quality, or experience. In the kitchen, rigorous measures are in place to avoid cross-contamination, such as disinfecting surfaces and using separate chopping boards. The dish is prepared separately from others but served at the same time as any other dishes for the table to ensure a seamless process from the customer perspective.

For Aisha's workplace, a strict staff training regime is felt to be most important for providing the safest and most relaxing experience for FHS guests. Training is handled by an external company, with staff sent regular reminders and eventually barred from the floor until they have completed appropriate food safety training, which includes the potential allergens in all food components.

Moves towards stricter legislation requiring allergen information on menus do not present substantial challenges for Aisha's business, given its size, the resources it has available, and its robust, existing processes. She holds some concerns about the appearance and length of the menu with additional information included and the risk of 'bombarding' guests with information, detracting from the relaxing experience they seek to offer. Aisha also perceives that, given the high price and quality of the service provided, FHS guests at the hotels in the group already feel sufficiently reassured by staff communicating verbally, and trust the procedures in place. This has been confirmed by feedback from guests.

10. Flexible and Lower FHS Engagement

Niall set up a small sandwich shop on an industrial estate just before the Covid-19 pandemic began. Because of his location, his customer base is a small group of regulars – including those who work in the other businesses on the estate and builders working on nearby projects.

Niall has posters for allergen information, which instruct customers to tell a member of staff if they have any dietary requirements. He prints these off from the FSA website, and although he would like to make ones himself that are more eye-catching, he is worried the specific phrasing used is important so will only use the templates the FSA provides online. Niall uses this method because he does not have a consistent menu. He often has 3-4 different items each day that are decided by what products they have in stock – or need to use up. He will verbally tell customers what is available that particular day, and they will choose from those options, rather than formalising a fuller menu (with allergen labelling). Otherwise, his staff (who are all part-time) attend council-run allergen and food safety courses, and they have a staff-facing list of the top 14 allergens and their ingredients.

Niall doesn't have FHS customers coming into his sandwich shop often, and he thinks individuals with FHS likely avoid places with informal menus such as his own. However, he does have processes in place to avoid cross-contamination should this be required, including having a separate preparation area for the food.

Because of his lack of a formalised menu, Niall is able to be far more flexible with the food he makes. If a customer does not want something included, either due to preferences or because of FHS needs, he can simply adapt the food when he makes it. At present, these processes are mostly used for food preferences, such as customers asking not to have egg or mustard included in their sandwich.

Niall thinks his system is working well because he has never had to turn a customer away, and they've never had an incident. However, he feels very reliant on customers informing him of their FHS needs, and aware that he might be trying to place responsibility on his customers – while FHS customers likely think he has sole responsibility for accommodating FHS needs. He has concerns that the calls for new requirements for food businesses are unrealistic for his sandwich shop, including the paperwork (for example, symbols / key on a menu) taking a significant amount of time and the slowing down of business at peak times through having to ask after allergens.

FBO preferences and needs

Businesses have different needs and preference with regards to allergen information due to the varied factors which influence businesses within each quadrant.

Fixed and Higher FHS engagement

Businesses in this quadrant are likely to have thorough structures and processes in place and therefore like to work to these. Any changes that they make tend to go through a process of review, ensuring that they meet both staff and consumer needs. Staff are well-trained in allergen management and processes.

These businesses may not print all allergen details on the menu, but they are more likely to have digital allergen materials available to staff and consumers, allowing information to be updated efficiently and making it easily accessible. As these businesses are likely to be chains, individuals in the sites are less likely to have control over the approach and instead there are individuals with specific responsibility for updating allergen information and menus, or head office support.

Due to the number of sites they cover, cost is more likely to be a barrier as changes would require reprinting of menus across many sites and training updates for a large number of staff.,.

“It’s an output that wouldn’t be cheap. It would cost money to outlay new menus and we’d probably be audited on it. When something gets first rolled out there’s a lot of moaning but a couple of months in people adapt to change.”

General Manager, Restaurant (National chain), >250 employees, Wales, Urban

Fixed and Lower FHS engagement

As these businesses have low awareness, knowledge, or interaction with FHS they are unlikely to have much in place and unlikely to see a need to have labelling or processes in place. The preference for the FBOs in this quadrant is for consumers to speak to them and inform staff as they are likely to place the responsibility with the customer.

For many they either have not or rarely come across FHS consumers and therefore see little need to change their menus or other allergen labelling, particularly when it will cost them both in terms of time and money. They may have prompts to inform staff and are more likely to not serve FHS consumers to avoid anything going wrong, and to protect themselves and their business from that eventuality.

This quadrant is typically small businesses who are most likely to need support in terms of both knowledge and resource, including training to raise awareness and understanding of FHS needs among staff. It is also likely that they have manual processes in terms of updating any back-of-house allergen matrices, and would therefore feel the time and financial cost of legislation changes more heavily than some other businesses.

"Fussy eaters just don't seem to come. We're mostly asked about vegan/vegetarian... I would love to welcome people with allergies with open arms, but sometimes you can't."

Owner, Takeaway (Independent), <9 employees, England (Urban)

Flexible and Higher FHS engagement

FBOs in this quadrant are most likely to put the customer experience at the heart of what they do, and therefore are likely to continually adapt and improve their approach to FHS consumers, ensuring that every change they make is in their interest. The specific approaches these businesses take are likely to vary but they are open to new approaches and willing to try.

For many, rather than providing specific allergen labelling, there is a preference for listing ingredients and having the ability to adapt. Staff are also well-trained with good experience and knowledge of the dishes and what they contain. Therefore, any further changes are unlikely to have a large impact on these businesses.

"[Our approach is] effective, it comes down to staff training [...] We have a particular way we like to interface with guests, going that extra mile, making them feel totally relaxed – so it's part of that."

Purchasing Manager, Hotel (National chain), >250 employees England (Rural)

Flexible and Lower FHS engagement

This quadrant is likely to have some basic allergen labelling but prefer verbal communication between FHS consumers, front-of-house staff and kitchen staff should an FHS consumer visit and require a dish to be adapted. These businesses will already make accommodations for FHS consumers, particularly as they are likely to have regular customers with whom they build some rapport.

However, due to lower footfall and this familiarity with consumers they are unlikely to be motivated to add further allergen labelling. Additional allergen information is likely to be seen as an unnecessary use of time and money as their current approaches work well and it can be difficult to see the value in a more detailed approach.

"70% of the time we're serving locals and regulars. I know already what they will want and what they will order [...] I think [our approach] is enough. It's a small independent pub [...] The majority of people just tell you – why would you not! If you've got an allergy and not told us, that's on you."

Assistant Manager, Pub (Independent), 10-49 employees, England (Urban)

Staff motivation – a common challenge

Mainly for businesses with typically lower FHS engagement, staff motivation can be a challenge for owners and management. Serving staff in particular can often be younger, using the role as a stepping-stone, or seeing it as 'just a job' rather than a career. It can therefore be difficult to get these staff members invested in both the food and wanting to deliver good customer service.

"It's tough sometimes if I have a staff member who isn't as motivated and doesn't put the effort into the job. Many are using it as a gap filler. It's challenging to keep them as on it as you as they don't treat the industry as seriously as you, they see it as a gap filler rather than a career."

Owner, Cafe (Independent), 10-49 employees, England (Urban)

FBO engagement with FSA guidance and resources

Qualitatively, the majority of FBOs report being aware of the guidance around allergen information on the FSA's website, in particular the list of the 14 allergens. Businesses tend to be using this as an ad-hoc reference when they have specific queries. However, this awareness does not seem to translate into deeper engagement with other FSA resources. A smaller number of businesses report actively engaging with FSA resources such as the Safer Food, Better Business (SFBB) pack, especially in the earlier stages of setting up the business. Similarly, in the quantitative survey, few businesses (4%) mention unprompted that staff in their business receive training through FSA e-learning resources.

SFBB Pack

While a large proportion of businesses report being aware of the SFBB pack, only a handful of businesses in the qualitative sample said they were currently using this. These businesses are generally smaller and more likely to be independently owned, and are appreciative of the daily processes that the SFBB pack helps them to implement. Businesses are most likely to be using the daily diary, with some also reporting that they have put up signage included within the pack.

A number of FBOs report having engaged with the SFBB pack then they first opened their business, with some having used the pack in previous roles and carrying this over when they set-up their own business. Some have subsequently developed their own processes, whilst others have continued to use the pack to structure their approach to allergen management.

“I like it [the SFBB pack]. It's great for small businesses – pretty much tick and go.”

Head Chef, Pub (Independent), <9 employees, England (Rural)

While broadly seen as a useful resource among those who use it, FBOs raise a few specific criticisms of the SFBB pack:

- Some feel the SFBB pack is **geared too strongly towards businesses who use a high proportion of pre-prepared elements** in their food, meaning it

feels less relevant and appropriate for businesses who cook more from scratch

- **Not felt to be relevant to larger chains** which have their own in-house food and safety teams
- Some feel that elements of the SFBB pack are **out-dated, or that there are gaps** which limit how useful they find it

"The FSA SFBB pack felt it was more for chains. They could aim things towards independents, for example by not including information on pre-packed food if you make everything from scratch."

Owner, Pub (Independent), 10-49 employees, England (Rural)

"Some of the stuff in it [the SFBB pack] is viable. Some of it is a bit old-school."

Owner, Catering Business (Independent), 10-49 employees, England (Urban)

FSA Training Resources

Both quantitatively and qualitatively only a small number of businesses report accessing FSA training on allergens. This may be driven in part by some participants being unaware of who their current training provider is, but many report using other specialist training services, particularly among the largest businesses, or more ad-hoc, in-house training in smaller businesses. FBOs in the qualitative sample mention briefing staff on the 14 allergens as a minimum, for which the FSA is the main source of information. Free online training courses provided by the FSA are applauded by those who are aware of them. The majority of others tend to feel that their current training approach is working well for their business.

"The council provide training in Mandarin and Cantonese, which is much easier for my guys to learn. Maybe the FSA do provide training in those languages, I don't know."

Owner, Takeaway (Independent), <9 employees, Northern Ireland (Rural)

“The Food Standards Agency in Wales have a free online course on allergens which I tell staff to go on to. They download the certificate and we put that in a folder with food handling certificates.”

Owner, Café (Independent), <9 employees, Wales (Suburban)

“The company that own the hotel have a training platform online. HR are constantly checking people have done those trainings.”

Executive Chef, Hotel (National Chain), >250 Employees, England (Urban)

Further support needed by FBOs from the FSA

The qualitative interviews point to a number of areas where FBOs feel the FSA could improve how it supports and guides businesses on the topic of allergen information:

- A number of FBOs, as well as stakeholders, mention that **current FSA guidance feels like it is targeting restaurants and cafes**, and that it **could be better tailored to other types of businesses**, such as takeaways and mobile units
- Some feel that the FSA is reactive and **would like to see the FSA take a more proactive approach** to providing and updating guidance in this area
- FBOs also express that they **would like to see the FSA help to educate FHS consumers on allergies and eating out**, to support businesses in interactions with their FHS customers

“The focus of the FSA seems very restaurant driven.”

Stakeholder, Trade Association

“We all did a new, full-day training session back in September – because of Natasha’s law, things changed.”

Other Role, Head of Catering, Education, >250 employees, England (Suburban)

“Sometimes I feel some of the information I get I hear a bit too late. [The FSA] could be more proactive with information.”

Development Chef, Institution, >250 employees, England (Suburban)

"It's more about the customers being as educated as they can about their allergy."

General Manager, Pub (Independent), 10-49 employees, England (Rural)

11. Consumer engagement with allergen information

Key Findings

1. **There are three key factors that drive consumers' trust in the ability of a business to manage FHS requirements:**

1. **The sincerity with which a business is perceived to approach FHS**
2. **The perceived risk of human error**
3. **Familiarity with the business**

These factors can influence the way in which an FHS consumer engages with allergen information within a business for example, where trust is lower, consumers are more likely to want to engage directly with staff for additional reassurance.

2. **An overall desire for autonomy and control underpins how FHS consumers engage with allergen information.** Consumers want to be armed with the information they need to make an informed decision, with minimal intervention from staff – they feel their own judgement is more reliable. This also avoids them having their food options unnecessarily limited.
3. **For this reason, consumers' ideal journey puts an emphasis on written information, ease, and minimal fuss.** Consumers want detailed written information available online and in person, that they can access quickly and without too many touchpoints with staff members. Their overall aim is to have as 'normal' an experience as possible.
4. **Expectations around allergen information are different within different types of business.** For example, consumers are more likely to want and expect written information in a busy chain restaurant, whereas they may expect greater flexibility and the options to make substitutions at a high-end hotel.

5. **Menu labelling is an important method for accessing allergen information, so it must be clear, but both FHS and non-FHS consumers alike do not want businesses to compromise on style.** While consumers feel a standardised approach to menu labelling would be helpful, they are reluctant for this to detract from the style and individuality of different business' menus, as doing so may interfere with their experience.

Overall drivers and barriers of trust in allergen information

Written information, supported by verbal confirmation from staff, is the most trusted approach for accessing allergen information among FHS consumers.

There are a number of factors driving this trust, including:

1. The sincerity with which a business is perceived to approach FHS
2. Perceived risk of human error
3. Familiarity with the business

Settings which typically provide more written information are therefore more likely to be trusted. In general larger, fixed venues (such as restaurants and hotels) are more likely to have allergen labelling on menus, providing greater confidence in these sorts of businesses. On the other hand, allergen labelling on menus for smaller and mobile businesses (such as food trucks and small takeaways) is rarer, meaning FHS consumers are more likely to need to rely on speaking to staff in these settings, which reduces feelings of trust.

“Some restaurants have clear allergen menus – I obviously prefer this than having to ask a member of staff who are not always knowledgeable and could give me the wrong advice.” Coeliac, Female, 51+

There are some instances where the role of conversations with staff may be upweighted compared with the role of written information. This is most likely to occur when:

- The FHS consumer has a severe hypersensitivity or is caring for a child with a moderate / severe hypersensitivity for example, to ask about preparation due to cross-contamination risks

- An allergen is difficult to pinpoint in a dish
- When ordering on behalf of someone else with FHS
- When in an unfamiliar setting

"If it was for myself I wouldn't worry so much, but because it's for my son, I just don't want him to get a tummy ache."

Moderate Allergy (Parent), Female, 18-30

"I think if I was at all unsure I would now just double check that nothing in my chosen dish did contain nuts for example chopped nuts on top of a desert."

Severe Allergy, Female, 31-50

1. The sincerity with which a business is perceived to approach FHS

Providing written down, detailed allergen information is understood as an indicator that a business takes FHS seriously, which increase FHS consumers' confidence. As such, for many FHS consumers, labels like 'may contain traces of...' are a real bugbear. Those with severe and/or clear-cut hypersensitivities see this as a 'get out jail free card' for establishments to 'cover their own backs', which reduces trust in the business.

Many FHS consumers, particularly those with more severe or more difficult to accommodate allergies, will research a business' menu in advance of visiting. This allows them to feel that they are well armed with information when they arrive, and avoids parts of the experience that cause them discomfort, such as the potential for staff to make a fuss or make them feel 'singled-out'.

Businesses with a strong online presence, which makes clear their approach to FHS, are more likely to be trusted. As with having allergen information on printed menus, this conveys to FHS consumers that a business takes allergens seriously and has robust processes in place to handle allergens, all of which builds confidence.

Staff interactions can also influence FHS consumers' view of how seriously a food business takes FHS, and therefore the degree to which they trust the business to be effective in its information and approaches. Where staff display empathy with and

understanding of FHS, it indicates to consumers that this is a business priority, providing them with reassurance and building trust. For example:

- Staff members being knowledgeable about FHS, allowing for a ‘fuss free’ interaction and experience
- Kitchen staff being able and willing to adapt dishes
- Staff members disclosing they have the same allergy/intolerance, providing additional reassurance of their knowledge and understanding

Conversely, negative interactions with staff which indicate a more flippant or apathetic approach to allergens can quickly dismantle FHS consumers’ trust, not only with the business being visited, but also with other similar food businesses.

Examples include:

- Staff members demonstrating a lack of empathy for example, being snappy or impatient when asked about allergen information by a customer
- Staff members seemingly not taking allergens seriously (for example, asking if someone is a ‘real coeliac’)

“It makes it easier when the waiter or waitress is understanding. It doesn’t really bother me anymore, but some people do get upset by [staff] rolling their eyes. It used to upset me when I was first diagnosed.”

Coeliac, Female, 18-30

“There was that a disclaimer on it, so I guess the risk was then put on you and the restaurant doesn't take responsibility. So then I always question how seriously they're taking it because they've got a ‘get out clause’ there.”

Moderate Allergy (Parent), Female, 31-50

2. Perceived risk of human error

There is a perception that there is less risk of human error when using written down allergen information compared with relying on conversations with staff. There is generally low awareness of what businesses do in response to a declaration that a customer has an allergy, and the chain of events this leads to. FHS consumers do

not consciously consider the processes behind keeping menus up-to-date, including the impact of substitutions on menu accuracy, and therefore see written information as more reliable than information directly from (particularly waiting) staff, which is considered to be less well controlled.

This is exacerbated by poor previous experiences with staff in food businesses, such as staff members being confused by FHS terminology (for example, coeliac) or, in some instances, the consumer being served a dish containing allergens. This leaves a lasting impression and can dent consumers' confidence in the knowledge of waiting staff, and makes relying on verbal interactions feel like a riskier route. FHS participants' main concerns are that staff may lack the training and experience when it comes to understanding and managing food hypersensitivities, which could lead to them accidentally order food containing an allergen.

The business and speed of delivery in a food venue can also influence how trusting FHS consumers are of its allergen approaches and information. Settings with high footfall and where staff are dealing with multiple customers at pace are less likely to be trusted. This is driven by a concern that when staff appear rushed and to be 'spinning lots of plates', allergen information may not get properly communicated between customers and the kitchen, introducing an element of risk. In these settings particularly there is a preference for written allergy information as the competing demands on waiting staff are felt to reduce their reliability.

A secondary concern for FHS consumers is feeling like more of a hindrance or annoyance for needing additional information or support in busy settings. They worry about feeling inadvertently pressured to make quick decisions which could cause them to select something which might make them ill. Interestingly, this concern is shared by some FBOs with fast paced businesses (for example, market stalls, takeaways) who fear that forcing consumers into conversations with staff about their FHS may make consumers uncomfortable and cause them to make snap decisions with bad consequences.

"I don't like asking people questions, so if it was all right there, I'd know exactly what I can/can't have [...] Takes some of the pressure off I guess."

Moderate Allergy (Parent), Female, 18-30

“Some customers feel like a hindrance or that they’re being awkward when asking about allergens. If there is something customers can stand and read at their leisure, you find the interaction with the customer more laid back. They aren’t as worried or uptight. It’s risky if people feel too awkward to ask and end up just buying something as they are feeling pressured.”

Owner, Takeaway (Independent), 1-9 employees, Northern Ireland (rural)

3. Familiarity with the business

There are two types of familiarity which can influence trust:

1. **Familiarity with a brand or name.** For example, large, well-recognised chain restaurants. The size and scale of these businesses means they are often highly trusted to have stringent and effective approaches to allergens.
 - FHS consumers’ perceptions and experience are that the staff are better trained on allergens in chain restaurants than in other establishments, and standardised menus across multiple venues also give consumers more confidence.
 - There is also a belief that the reputations of big chains are on the line, and it is therefore assumed that these businesses would feel a stronger sense of duty to keep their customers safe.
2. **Familiarity with a particular venue.** For example, a local establishment where consumers know the menu well, have built rapport with the staff and have had conversations around their FHS requirements before.
 - Having ordered and safely eaten from a food business before leads consumers to have increased confidence in doing so again – although this is often limited to the same menu item(s). This is particularly true for FHS consumers with **severe** hypersensitivities.
 - An existing relationship with staff limits the need for new discussions around FHS on each visit, leading to a more ‘normal’ experience.

“I would trust the information provided because it can be kept up to date centrally for all restaurants. It is more likely to be checked in a timely manner than a sheet/folder printed in the individual restaurants.”

Severe Allergy, Female, 31-50

“We also get some of [our local bakery’s] breads [...] I just ask the girls in there if there’s any egg or big amounts of egg in it, they’re usually pretty good at telling me. There wouldn’t be ingredients list up because it’s a local bakery.”

Moderate Allergy (Parent), Female, 31-50

Greater sense of familiarity with a business means FHS consumers are less likely to feel the need to have detailed conversations with staff, and may instead just double check things, which helps avoid disruption to the overall experience. They are also much less likely to feel the need to review more detailed allergen information such as matrices or ingredients lists, instead feeling comfortable to rely on menus, confirmation from staff and their own knowledge.

FHS consumers’ desire for control and autonomy – an overarching driver

FHS consumers’ preference for written information is also driven by the fact that being able to access allergen information from the menu provides FHS consumers we a sense of autonomy and control. A secondary concern for FHS consumers is that staff’s lack of knowledge may reduce their food options further, as staff members may not have clarity on what dishes are safe for a certain hypersensitivity, and therefore may recommend a smaller list of options.

Staff members denying customers dishes they could eat due to misunderstandings about the nature of allergies and intolerances (for example, where a consumer is comfortable eating an ingredient in a cooked but not a raw state) is a source of frustration. Conversely, when it comes to blanket allergen statements such as ‘may contain’, FHS consumers (especially those with changing and/or moderate FHS) complain that these labels sometimes mean staff refuse to serve them food they can eat safely. Relying more on written information, as opposed to interactions with staff, is felt to alleviate and minimise the risk of these situations occurring.

“I was told that several of the items were a ‘May Contain Dairy’. Although I understand and appreciate this information, and the risk of cross contamination is identified, it is quite annoying when people serving tell you that you can’t have it [...] My little boy has always been okay with may contains and as his parent I monitor and make that decision.”

Moderate Allergy (Parent), Female, 31-50

Consumers’ Ideal FHS Journey

Contextual expectations

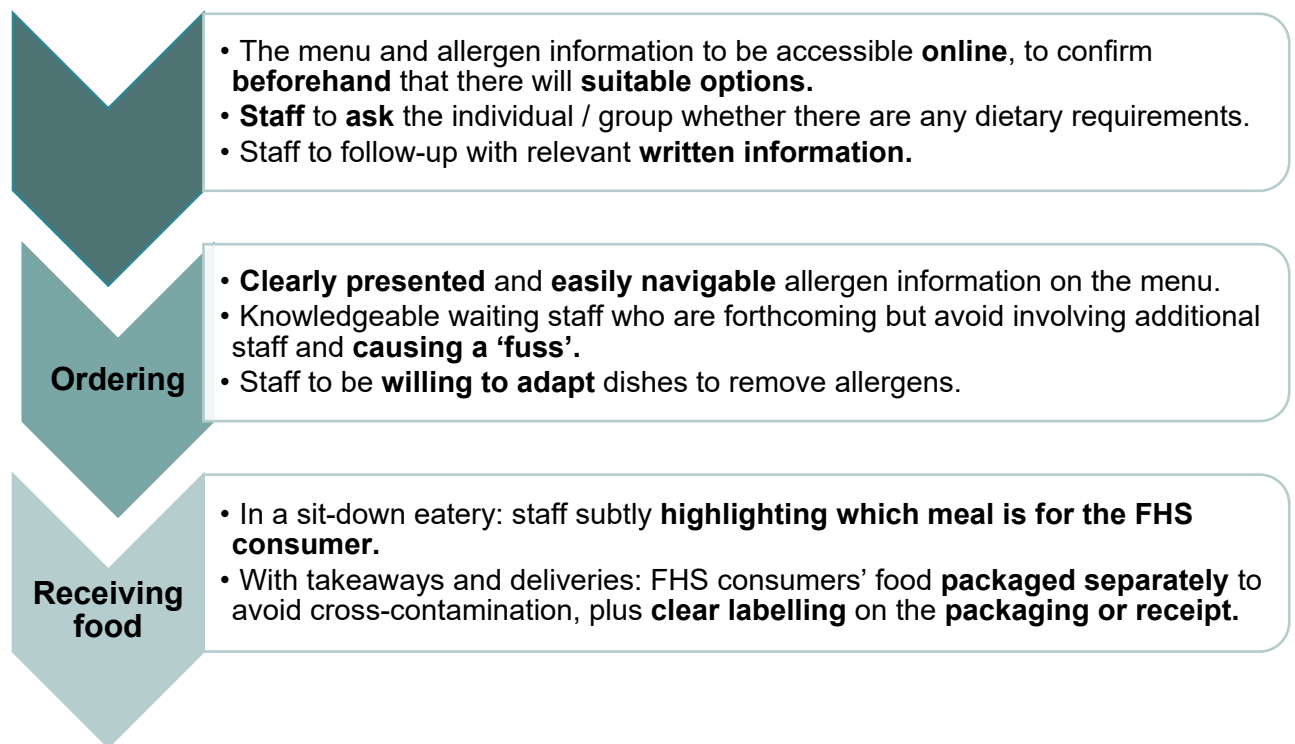
This section outlines FHS consumers ideal journey for accessing allergen information, including key touch points where they want information to be presented, and in what form.

It is worth noting first, however, that consumer expectations will vary slightly depending on the type of food business being visited. This is influenced by what would be considered a ‘normal’ experience in each setting, which makes different modes for communicating allergen information feel more or less preferable depending on the context. For example, when visiting:

- **A Fixed, Higher FHS Engagement business** (such as a chain restaurant) – consumers are more likely to expect detailed, written information to enable them to make decisions in a busy and fast-moving environment
- **A Fixed, Lower FHS Engagement business** (such as a local takeaway) – there are more likely to be expectations around having allergen information available as a sign on the wall or on menu boards
- **A Flexible, Higher FHS Engagement business** (such as a high-end restaurant) – consumers are a more likely to want and expect a greater emphasis on conversations with staff, as these businesses typically forefront customer interactions and a more bespoke service
- **A Flexible, Lower engagement business** (such as a local café) – consumers are more likely to visit regularly, be familiar with the menu and the staff, and likewise the staff are familiar with their needs

The Ideal FHS Consumer Journey:

Figure 11 Diagram of the ideal FHS consumer journey



Before Ordering

1. Menus and allergen information available online, to check before their visit.

- FHS consumers like to confirm in advance of eating out that there will be options available that meet their needs.
- This guides their choice of where to eat out and allows pre-planning, reducing the stress of choosing what to order when visiting somewhere new.

“I looked on the website for Greggs prior to going in to order. This gave me peace of mind that I knew what to order before going in and feeling pressurised to order quickly.”

Moderate Allergy (Parent), Female, 31-50

2. Staff to ask the individual / group, in an informal and conversational tone, whether there are any dietary requirements

- This introduces an opportunity for any FHS needs to be introduced in a way that avoids singling out FHS consumers as different, supporting their desire for a normalised experience
- It is more reliable than a sign on the door or wall, which could easily be missed

“A positive eating out experience is one where the waiting staff’s first question is ‘does anyone have an allergy?’. This provides reassurance that measures are in place to keep patrons safe.”

Severe Allergy, Female, 31-50

3. Staff to follow-up with relevant written information

- If allergens are not labelled on the main menu, by providing other written information at this stage, before the decision-making process has begun
- FHS consumers preference is for a specific allergen menu, which can be used in place of a normal menu, or a QR code which can be used to access an online menu

“Some places have a designated gluten free menu and written what they can adapt or do [...] So you have a menu like everyone else has instead of filtering through and checking.”

Moderate Intolerance, Female, 31-50

Ordering

4. Allergen information to be clearly presented in a quickly navigable way

- FHS consumers want to avoid causing delays to their party due to having to sift through complicated allergen information
- They would prefer to be able to use the information (for example, menu) that they are first presented with, rather than having to be brought additional information at the point of ordering

- In an ideal situation, they would be able to quickly filter through information to quickly find exactly what they can eat – the best example of this is being able to filter by an allergen on a digital menu

“Honest Burgers again is by far my favourite for allergen advice. With 3 different ways to order in store, a menu on the table, a large written menu on the back wall and a menu online with a drop down allergen choice menu ensures that everyone is on the same page when ordering with allergies.”

Moderate Allergy (Parent), Female, 31-50

5. Waiting staff to be knowledgeable enough to answer any questions when ordering

- A point of tension for consumers can be when waiting staff need to go and check things with other staff members, which causes delays and makes them feel like they are causing a ‘fuss’
- Particularly for FHS consumers, this is an important touchpoint for confirming allergy information deciphered from the menu
- Staff repeating back the order, including any allergen requirements, is a non-disruptive way to provide additional reassurance

"I like a waiter that knows without going and asking the kitchen, I feel like they're supposed to know."

Coeliac, Female, 18-30

6. Staff to be willing to adapt dishes to cater to FHS consumers' needs

- FHS consumers appreciate when staff are willing to make substitutions or remove allergens from the dish, as this expands the number of options available to them.

“They can also offer the meal I wanted, if it contains nuts/seeds, without the ingredients which would cater for my allergy [...] I really appreciated the helpfulness of the staff/restaurant.”

Severe (Nut) Allergy, Male, 18-30

Delivery of Food

7. Confirmation of order, including any allergens

- Light-touch verbal confirmation of the order when it is delivered, including highlighting any allergy requirements, provides final reassurance to consumers before consumption
- Other visual confirmations – such as flags, stickers, or notes on takeaway boxes – are also effective, particularly in environments where expectations around staff interaction is lower
- Packaging takeaway or delivery items for FHS consumers separately is seen as an important measure to mitigate the risk of cross-contamination

“In a restaurant, when they bring the food, its nicer if they’re not shouting ‘gluten free’ but saying [it] so you now it’s the right meal, to quietly remind you that they remember [...] It’s not a big deal and should be easy to eat out when you have an allergy.”

Moderate Intolerance, Female, 31-50

Menu Presentation Preferences

Broadly, for both FHS and non-FHS consumers, the ideal approach to allergen information would be:

1. Clear and detailed use of symbols for the most common allergens

- Letters are preferred to images, as they are easier to interpret
 - For example, V, VG, GF, DF, NF etc.

- Non-FHS consumers are familiar with these sorts of symbols and understand the importance of highlighting them
- Both FHS and non-FHS consumers express an interest in a standardised system of allergen labelling on menus, to avoid consumers having to learn the individual approach of each establishment

2. Easy to read menus

- Not overloading the menu with too much detail, for example by having separate menus or information for some less common allergens
- Avoiding dark backgrounds, which make locating and interpreting symbols more difficult

3. A focus on what you can eat, rather than what you can't

- i.e., this dish is gluten-free, *not* this dish contains gluten
- This way people can easily scan menus looking for dishes with the relevant symbols
- This also applies to allergen searching / filtering when using digital menus and apps

4. Not compromising on style

- FHS and non-FHS consumers alike don't want establishments to sacrifice style when incorporating allergen information, even if this becomes standardised
- They are happy for businesses to display this information in a way that is in-keeping with their own particular style

“I have found that menus with their dishes stated and the ‘symbol’ for each allergen listed beside to be the most convenient. A good example of this is Subway.”

Coeliac, Male, 18-30

Consumer pen portraits

Severe FHS consumers

Maggie has a four-year-old son, **Liam**, who was diagnosed with coeliac disease in the last year. She had noticed him vomiting frequently after eating, which was later identified as his main symptom from eating gluten, once he was diagnosed with coeliac disease. By carefully controlling Liam's diet to avoid cross-contamination as well as gluten products, he now very rarely has any symptoms.

Since Liam's diagnosis, Maggie and her family's eating habits have changed significantly. Getting any kind of food when out of their home is exceptionally difficult, with some places having no gluten-free options or being out of stock. When gluten-free options are available, these foods are often not suitable for a child of Liam's age (for example, a salad). This means Maggie feels she has to extensively research anywhere they go to eat before she goes out or orders from anywhere, checking for gluten-free specific menus and any information on how allergen foods are prepared. Changing plans (such as a 'suitable' location being out of stock or closed) can cause real panic.

Even when Maggie thinks she has found a suitable place to take Liam for food out-of-home, she has been faced with numerous negative experiences. The waiting staff play a key role in whether Maggie has a good or bad experience eating out with her son: low knowledge has led to dismissive behaviour about Liam's needs, and when asking questions about what allergens are in the food and how it is prepared, Maggie is often faced with staff who don't have any knowledge about their menu's allergens or are unaware of the risks of cross-contamination.

Positive experiences of eating out are limited to places Maggie knows. These are the places where she has never found gluten-free options out of stock, knows the processes staff have to avoid cross-contamination, and her son will like the food. Finding somewhere which ticks all of these essential boxes can be exceptionally difficult, leaving Maggie feeling unable to be spontaneous when eating with her son.

Moderate FHS consumers

Hannah has been allergic to raw egg since she was a young child. Although eating eggs cooked in (for example) a cake will not affect her, she becomes unwell if she eats eggs directly or if she eats something containing raw egg.

In the many years Hannah has been managing her allergy, she's noticed a real improvement recently in the information available when eating out of home. She's noticed more information about dishes, and particularly labels for food being either vegetarian or vegan. Hannah mostly relies on this written information when she's placing an order somewhere, checking what dishes have egg or likely have raw egg, and mentioning when she orders if she thinks an amendment is necessary (for example,, swapping something out or asking to have something without a sauce).

This method works well for Hannah most of the time. For example, she often visits a burger restaurant near her home. She always reads the menu and double-checks if anything has changed, but knows that there are several options without either eggs or raw egg as an ingredient. When she orders, she makes sure to ask for no mayonnaise, and does double-check the condiment hasn't been added to her dish because some people forget mayonnaise contains egg.

She did have a bad experience recently, however. She went to a café with friends for brunch, and when ordering asked if she could amend a dish because of her allergy to raw egg. As a result, the serving staff refused to serve her anything that 'may contain' egg – which included hash browns, the toast, and more. In the end she had to opt for a vegan meal, which was frustrating because she normally eats meat and didn't like having to eat a meat-free dish.

Mild FHS consumers

Over the last few years, **Jack** has developed an intolerance to kiwis. He had never had any type of sensitivity to food in the past, so was not used to having to think about what he eats.

Despite this, he feels like eating out or ordering a takeaway has only changed a little for him. Now, Jack reads the menu descriptions a bit more carefully when he's choosing what to eat, but also uses some common sense on what dishes may or may not contain kiwi. For example, he feels he can be confident when ordering fish and chips, so doesn't worry about where he is ordering this type of food from. He tends to be more careful when choosing something vague or that could potentially have kiwi in it – such as a 'tropical fruit salad'. In those cases, he would ask what is

in the food (although likely not say it is because he has an allergy) or would order something else.

Jack has had one experience where he was brought a dish with kiwi in it when eating out. After reading the description of a sorbet on the menu, he assumed this wouldn't contain any kiwi. However, when this was brought out, one of the three scoops was kiwi. While thinking it was a bit annoying it wasn't mentioned on the menu description, Jack just ate around the scoop, eating the other, non-kiwi flavours.

12. Attitudes to potential proposals and changes

Awareness of recent and proposed legislation

Across both the consumer and FBO audiences in our surveys, awareness of any recent legislation (for example, Natasha's Law) and proposed legislation (for example, at the time of fieldwork, calorie labelling on menus) is low.¹³ Those FBO participants who sell PPDS food do raise legislative changes spontaneously, and a few more have a vague awareness once prompted.

There are three business types that were more aware of recent legislation changes:

- Awareness is greatest amongst larger business, with operations and back-of-house roles designed specifically to keep up to date on this sort of information, and to implement any legislative changes in a timely manner.
- Businesses who sell food PPDS as well as non-prepacked food also tend to be more aware, since they have had to incorporate certain requirements into their processes around their pre-packed food since October 2021.
- Lastly, businesses who are particularly engaged with any updates on allergen information are more likely to be abreast of new and proposed legislation in relation to this topic.

"We're always striving to find ways to actually do more. I can give you an example, over lockdown...I befriended, Natasha's parents on social media and now as a company we are working with Natasha's parents to improve what we do and to raise

¹³ Businesses in our sample were not necessarily selling PPDS, and were not therefore expected to know about Natasha's law.

awareness and educate about allergens as well.”

Technical and Safety Manager, Other (Independent), 10-49 employees, England (Urban)

Natasha’s Law

When asked about recent and potential legislation and requirements for food businesses, participants from larger FBOs sometimes raised Natasha’s Law.

Typically, someone in the business would have become aware of the legislation over the course of 2021 and brought it to the attention of the business. It would then have been assessed internally; during the assessment it would have become clear that it was only relevant for businesses with foods pre-packed for direct sale, at which point the business in question would decide whether it was for them or not, and continue where necessary.

“We came across Natasha’s Law towards the middle of last year, and we looked into that to see how it would affect the business. But it was just for pre-packed businesses, which obviously isn’t us. So, we were able to forget about that one. I think that was all.”

General Manager, Restaurant (national chain), 250+ employees, England (urban)

Across the entire FBO sample there was no awareness at all of proposed interventions for allergen information affecting the non-prepacked food sector.

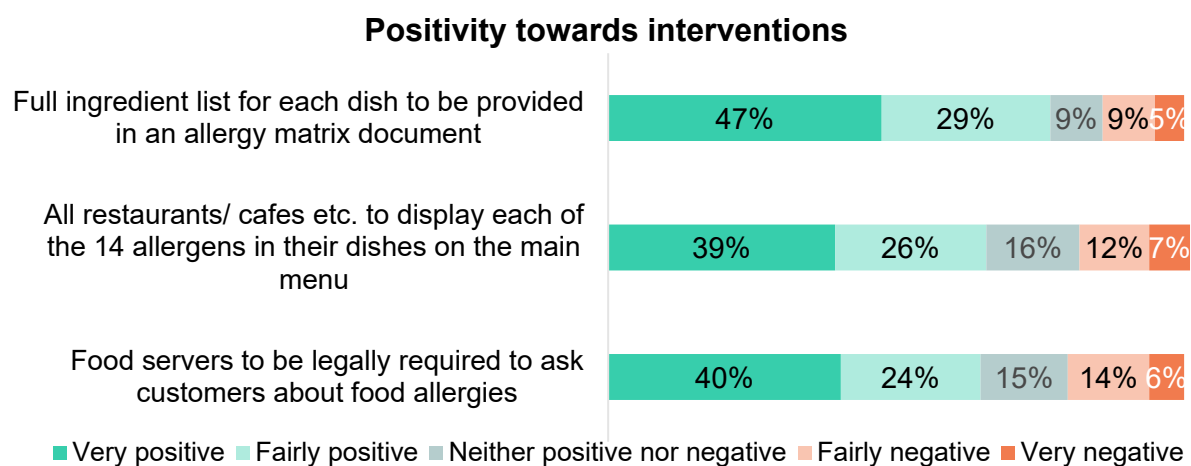
Attitudes to potential changes

In both the qualitative interviews and the quantitative survey we asked FBOs about three potential interventions which campaigners are seeking to be made into mandatory requirements for FBOs although it should be noted that only one of the interventions explicitly mentioned that this would be a legal requirement:

1. Displaying each of the 14 allergens in dishes on the main menu
2. Food servers being legally required to ask customers about allergies
3. Full ingredients list for each dish to be provided in an allergen matrix

Of the interventions presented to businesses, in the quantitative survey there is greatest positivity towards the use of an allergen matrix with three quarters (76%) positive towards this idea, including almost half of businesses (47%) feeling very positive.¹⁴ This compares to just under two thirds of businesses feeling positive towards showing the 14 allergens on main menus (65%) or food servers to be legally required to ask customers about allergies (64%).

Figure 12 Sentiment towards interventions ¹⁵

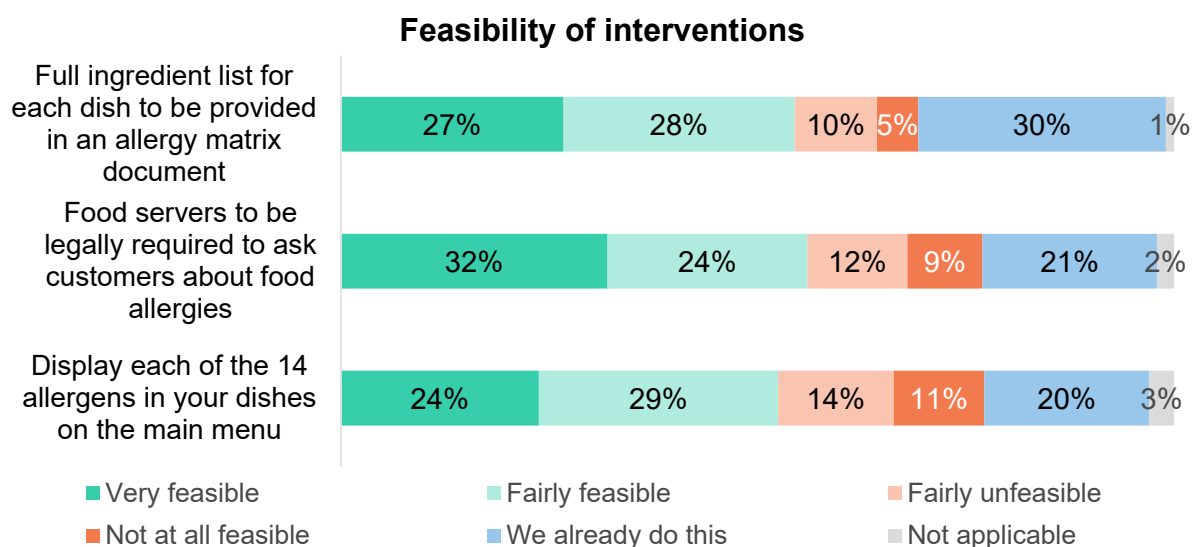


Base: All respondents (n=402)

¹⁴ QL1. How positive or negative do you feel about each of these ideas?

¹⁵ L1. How positive or negative do you feel about each of these ideas...

Figure 13 Feasibility of interventions¹⁶



Base: All respondents (n=402)

This positive sentiment towards the use of allergen matrices is likely driven in part by the fact that nearly a third of businesses surveyed are likely to already be using an allergen matrix (30%) compared with the other two interventions (20% display the 14 allergens on main menu, 21% have food servers ask customers about allergies).

In terms of feasibility of all businesses just over half of businesses felt the interventions were feasible (55% using an allergen matrix, 56% asking about allergens and 52% displaying allergens on menus).

Furthermore, of those who do not already adopt each of these approaches, four in five (79%) report that using an allergen matrix would be feasible for their business, compared with just under three quarters (73%) who feel it would be feasible for food servers to be legally required to ask customers about allergies, and two thirds (68%) who feel it would be feasible to display the 14 allergens on the main menu.

1. Displaying each of the 14 allergens in dishes on the main menu

NB. This was also an idea generated by FHS consumers participating in Phase 1 of this research

¹⁶ L3. How feasible would it be for your business to do the following....

Two thirds (65%) of participants in the quantitative survey feel positively towards the idea of restaurants and cafes displaying the 14 main allergens on their main menu. Although it should be noted businesses were not asked if this should be a legal requirement. Further, a fifth (20%) report that they already do this. This is mostly happening within chains (28%) and larger businesses with >250 employees (28%), whereas independently owned businesses (14%) or those with fewer than 250 employees (18% 1-9 employees, 18% 10-49 employees, 18% 50-250 employees) are less likely to be doing this already. Of those FBOs who do not already do it, over two thirds (68%) think that it would be feasible for them to do so.

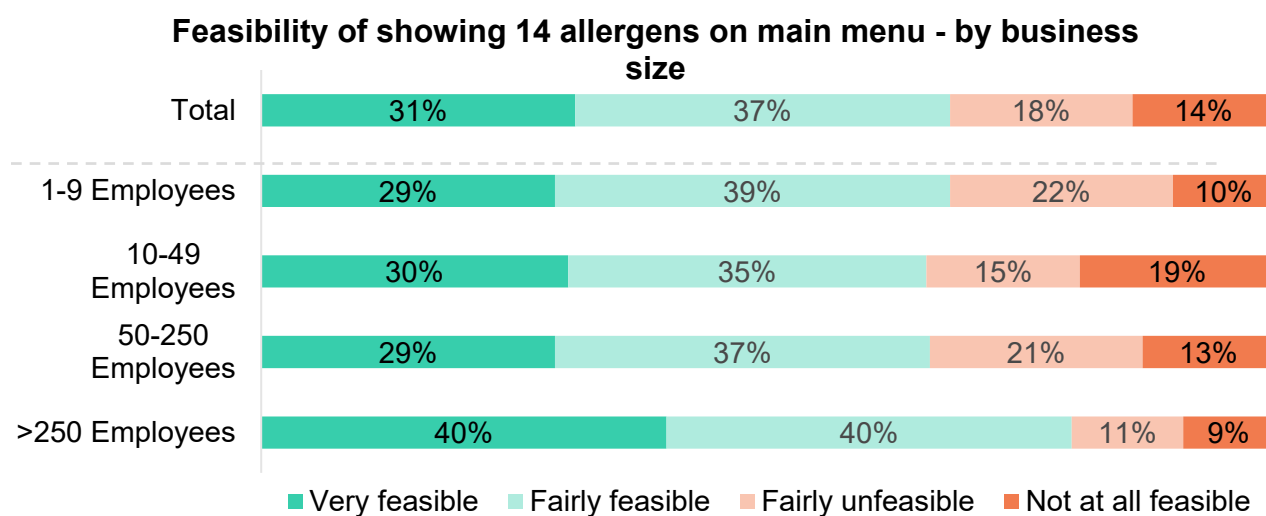
However, a substantial minority (32%) think that displaying each of the 14 allergens on the main menu would be unfeasible. However larger businesses with > 250 employees are less likely to find it unfeasible (20%).

Both positivity and feasibility are related to business size with large businesses warmer towards the proposed intervention.

Three quarters (75%) of businesses with >250 employees are positive towards the idea, This compares with just over three in five of FBOs of other sizes being positive (64% 1-9 employees; 64% 10-49 employees; 61% 50-250 employees).

The majority (80%) of FBOs with >250 employees who do not already display all 14 allergens on the menu report that it would be feasible to do so, compared with around two thirds of smaller businesses (68% 1-9 employees; 65% 10-49 employees; 66% 50-250 employees).

Figure 14 Feasibility of showing 14 allergens - by business size¹⁷



Base: All respondents who do not already do this nor to whom this is not applicable (n=309), and with 1-9 employees (n=72), 10-49 employees (n=110), 50-250 employees (n=82) and >250 employees (n=45).

Despite the fact that many of the participants in the quantitative sample feel positively towards the idea of displaying all 14 allergens on the main menu, when people reflected on this in the qualitative interviews, the majority push back on this suggestion, with industry trade bodies feeling the same way. There are four key reasons for this:

1. **The first and biggest concern is about customer experience.** There is an expectation that customers will end up with ‘information overload’, and FBOs worry that this could be off-putting for non-FHS customers, whilst causing confusion for FHS customers at the same time, as they try to decipher what they can eat. They are concerned that customers might make a mistake and place an incorrect order.

“The menu is small...it would be hard to add more on. Would be overwhelming for customers to look at.”

Other, Pub (Independent), 10-49 employees, England (Urban)

¹⁷ L3. How feasible would it be for your business to do the following....

“There is far too much information on there already – and calories are on the way now too – people don’t take any of it in anymore, it’s too confusing.”

Stakeholder, Trade Association

2. **Their next concern is about practicality**, especially for businesses with regularly changing menus – in these instances the constant need to update information on their menus would make this unfeasible. Equally, for those with small or simple menus, displaying all 14 allergens on the main menu feels like ‘overkill’. These concerns are reflected in the quantitative survey; among those that think displaying all 14 allergens on the main menu would be unfeasible (24% of the whole sample), this is most commonly due to there not being enough space on the menu (52%), or because it would make the menu look bad (31%).
3. **Qualitatively, another concern is that this requirement would limit communication between food servers and customers.** FBOs are worried that presenting all 14 allergens on the menu could dissuade customers from speaking to staff about their allergies and intolerances, which is ultimately what FBOs want FHS customers to do as they feel it is safest for consumers.
4. **Finally, a small number of FBOs in the qualitative interviews worry that presenting all 14 allergens on the menu could lead to staff (and customer) complacency** about other allergies that are not included within the allergies that make the top 14 list but could cause an equally severe reaction for a customer.

"It would definitely help to point out all 14 allergens on the menu, but also make sure all ingredients are properly listed on the menu or can be provided on request, as otherwise allergens outside the 14 could be missed."

General Manager, Pub (National chain), >250 employees, England (Urban)

Quantitatively, the biggest (unprompted) barriers to feasibility of labelling the 14 allergens on main menus as identified by the total sample are: not enough space on menus (52%), it would make the menu look bad / unattractive (31%) and it would be

time consuming to do this (20%).¹⁸ This reflects the top two barriers that emerge qualitatively.

Generally, the FBOs we heard from in the qualitative interviews see a clear benefit in having this information somewhere, but for many the main menu is not felt to be the right place. They would prefer this more detailed information to be kept in an allergen matrix or similar, which is available on request. A digital and easily navigable format would be the ideal.

However, if such a requirement were to be mandated, qualitatively FBOs felt that they would and could implement this, reflecting the quantitative findings around feasibility (see Figure 15). Small businesses in particular will find this most difficult from a time and financial resource perspective, and when the majority of all businesses think through the issues in detail they are not sure menu labelling is the right thing for them to do.

“Yeah, at the moment we already go a certain way. If this was a way we were moving forward I don’t think it’s a difficult thing to do”

Head Chef, Restaurant (Local chain), 10-49 employees, England (Urban)

2. Food servers being legally required to ask customers about allergies

In the quantitative survey 64% of food businesses are positive towards the idea of food servers being legally required to ask customers about food allergies.¹⁹

However, 21% are negative about the idea, and this is particularly the case among smaller business. Among businesses with 1-9 employees 32% express negative views towards this idea, compared with just 9% of businesses with >250 employees.

¹⁸ L4. You said that it wouldn’t be feasible for your workplace to display each of the 14 allergens in their dishes on the main menu. What made you choose that option? Interviewer did not read out options – unprompted responses were coded against these options.

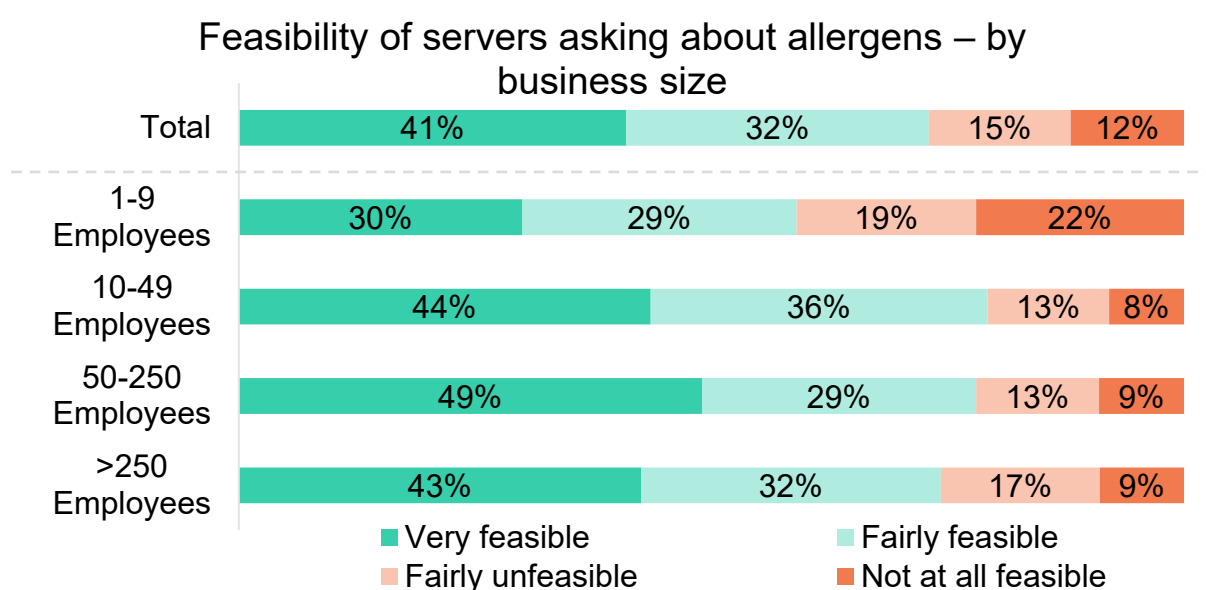
¹⁹ L1. How positive or negative do you feel about each of these ideas?

Qualitatively, for most businesses and industry trade bodies, customers disclosing their allergies and intolerances is felt to be highly important, and for FBOs it is a vital part of the communication they crave with customers. They are therefore supportive of a *recommended* approach that food servers ask customers about allergies. However, they strongly reject the idea of this being a *legal requirement* – it feels as if it puts all the responsibility around allergens on the business, rather than the customer, which they think is unfair.

Interestingly, 21% of businesses are already adopting this approach with customers (i.e., asking food servers to ask customers for information about potential allergies and intolerances). However, businesses with >250 employees are most likely to already do this (28%) and those with 1-9 employees least likely to (16%).

Of the businesses who do not already do this 27% felt it would be unfeasible. Microbusinesses are most likely to think it is unfeasible for them with 43% of businesses with 1-9 employees thinking that it would be unfeasible for them.

Figure 15. Feasibility of servers asking about allergens - by business size²⁰



Base: All respondents who do not already do this nor to whom this is not applicable (n=309), and with 1-9 employees (n=77), 10-49 employees (n=103), 50-250 employees (n=82) and >250 employees (n=47).

²⁰ L3. How feasible would it be for your business to do the following....

In the quantitative survey, among those who feel it would be unfeasible to legally require food servers to ask customers about allergies, the reasons most commonly given are shifting the responsibility to the business instead of the consumer (40%) and slowing down service (30%) and 19% think it would be difficult to ensure consistency among staff.

In the qualitative interviews, express concerns were expressed about being able to rely on younger, less experienced staff members to remember to carry out this task on every occasion, or on occasions where they might feel nervous or embarrassed to ask. So, making it a legal requirement, as opposed to something they endeavour to do, makes them feel very uncomfortable.

If such a requirement were to be put in place, FBOs feel that support would be needed to help ensure this was actioned within businesses, for example,, steps to prompt staff to ask customers, and methods to record whether this happened or not.

"We're already doing this [servers asking customers about allergies]. It can be quite effective, customers see it and can see what is actually in there without any questions, might feel more relaxed."

Head Chef, Pub (Independent), >250 employees, England (Suburban)

"16/17 year olds might forget to ask or be embarrassed to ask if it's a rude customer. I have a 16 year old - he would forget!"

Assistant Manager, Pub (Independent), 10-49 employees, England (Urban)

Full ingredients list for each dish to be provided in an allergen matrix

Three in ten (30%) FBOs already have an allergen matrix (or an equivalent, providing a highly detailed breakdown of the ingredients in each dish), and for those who don't, this feels like a feasible ask (79%), although it was not asked if this should be a legal requirement. Qualitatively we heard that FBOs can also see clear benefits of this in providing a reference for staff, a template for chefs to use when adapting dishes to make them safe for FHS consumers, and a document that can be shared with customers to help them make decisions.

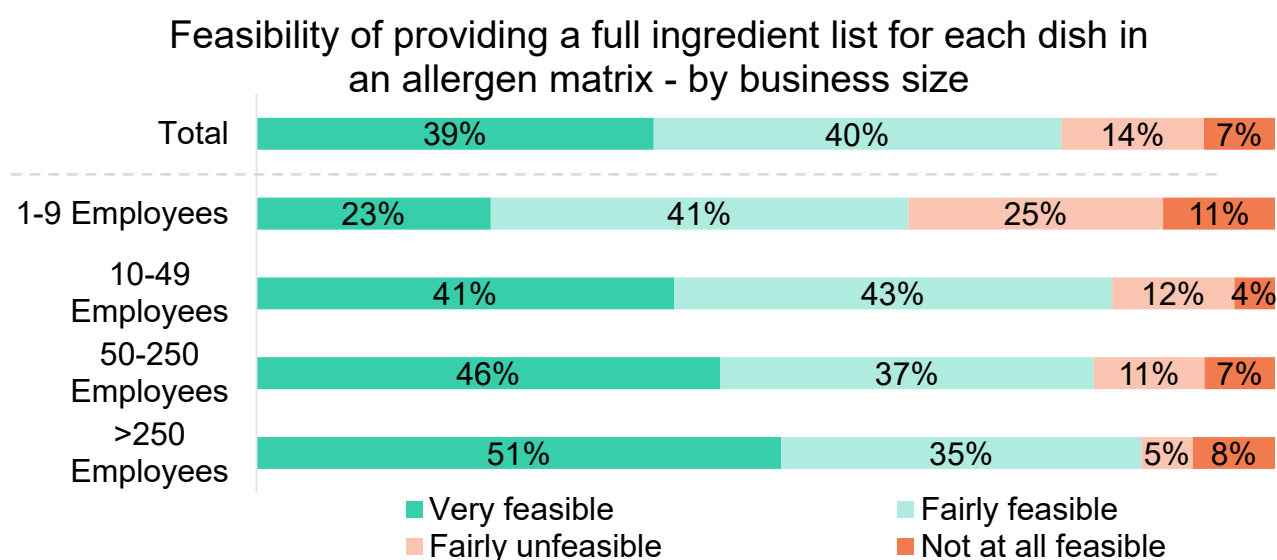
As a result, FBOs are generally supportive of this idea. Three quarters (76%) are positive. Again, there is a relationship with business size, with the largest businesses

being most positive. The vast majority (91%) of those with >250 employees are positive, compared with two thirds (67%) of those with 1-9 employees.

There are some exceptions, however. Over two in five (46%) of those with >250 employees already do this, compared with one in five (20%) of those with 1-9 employees.

Among those who do not already use allergen matrices, over a third (36%) of businesses with 1-9 employees think that it would be unfeasible for them to do so. By contrast, over four in five businesses of larger sizes think that it would be feasible for them (84% 10-49 employees; 83% 50-250 employees; 86% >250 employees). So, the impact of introducing such legislation is more likely to be felt by smaller businesses

Figure 16. Feasibility of showing full ingredients in an allergy matrix - by business size²¹



Base: All respondents who do not already do this nor to whom this is not applicable (n=279), and with 1-9 employees (n=73), 10-49 employees (n=93), 50-250 employees (n=76) and >250 employees (n=37).

Qualitatively, smaller businesses in particular express concerns about the time and possible financial cost of creating and continually updating such a document and would be looking to the FSA to support them in creating matrices and keeping them

²¹ L3. How feasible would it be for your business to do the following....

up to date. Industry trade bodies agree and suggest that the FSA focus on smaller businesses in terms of the advice and guidance that's offered. We spoke to a number of businesses who are already using the FSA template to do this; but they were unsure about the scalability of this approach should their menu grow.

"If a one-size-fits-all approach isn't right, and focussed materials are what's needed, then focus the energy where it's most needed – the smaller businesses."

Stakeholder, Trade Association

There is also some concern that a matrix could be hard to read for customers, and that they may misread across the rows if there is a lot of information to take in. Again, there is a preference for an easily navigable digital version where possible to make it easier to share the document with customers (for example,, using a QR code found on the main menu) and to keep it up to date.

Finally, as with labelling all 14 allergens on the main menu, FBOs are keen that this approach complements, rather than replaces, conversation and communication with customers about their allergies and intolerances.

"We have an allergen matrix available in the kitchen and online for customers anyway, so it would just be a case of printing it off and putting it in a customer friendly format."

Head Chef, Pub (Local chain), 50-250 employees, England (Suburban)

"You have it written down [...] people may misinterpret it, and order the item [...] The emphasis is on [the customers], to understand the menu, understand the symbols... It's a lot for them to take."

Operations Manager, Restaurant (Local chain), >250 employees, England (Urban)

1. Summary of differences in response to potential changes by type of decision maker

When looking at the attitudes of different decision makers towards feasibility, those in management roles generally seem to be least likely to feel the potential legislation ideas are feasible, with fewer than half thinking any of the ideas are feasible. Based on what we heard qualitatively, this is likely driven by concerns around the time and administration involved in adopting new processes such as these, which may be felt less keenly by those in dedicated technical and safety roles, or by those actually preparing the food.

2. FBOs' attitudes to potential changes: in conclusion

Some FBOs feel that there would be feasibility issues with these ideas, a quarter (26%) of FBOs in the quantitative survey don't think there would be any challenges in implementing the three ideas explored, with those in businesses with >250 employees most likely to think that there would not be any challenges (37%)

For those who do anticipate challenges, whilst there is no one standout challenge, there are three challenges identified in the quantitative survey for consideration: that these ideas would add time pressure (18%), menus would be difficult to keep up-to-date (16%), and menus would look unattractive (14%). Qualitatively, we heard that these would be challenges too, such as information overload on menus and the possibility of less verbal conversations but over time, and if made legislation, businesses would have to adapt to ensure this became part of the routine.

Due to staff capacity as well as differences in formal structures, these ideas are more likely to affect smaller businesses, who are therefore more likely to need support from the FSA should these proposals come into effect. This is evidenced in the quantitative survey where greater proportions of businesses with 1-9 employees find the proposals unfeasible than those with >250 employees. Small businesses with 1-9 employees are most likely to say they need guidance on allergen information (23% total, 31% 1-9 employees).

3. Implications for the future

This report provides an overview of the attitudes towards allergen information among FBOs and consumers, the drivers behind these views, and the way in which FHS requirements are approached by these two key groups. The research raises a number of key themes for consideration, as well as some recommendations for the FSA to take forward as the organisation continues to implement its Food Hypersensitivity Programme.

Key themes for consideration by the FSA

1. The need for some standardisation of allergen information across businesses – especially menu labelling – while recognising there is not a ‘one-size-fits-all’ solution. An approach which provides standardisation of key consumer touchpoints (for example, the symbols used to convey different allergens that focus on what the consumer can eat) whilst providing businesses with the flexibility to tailor approaches (within reason) to suit their own individual style (for example, their own menu design and colour scheme) works well for FBOs, FHS consumers and non-FHS consumers alike.

2. The importance of both written and verbal information. FHS consumers and FBOs alike recognise the importance of both these forms of communication – generally one is not enough without the other. FHS consumers prefer to engage with written information first, but recognise the reassurance that staff can bring when seeking clarification or making requests for substitutions/changes to dishes. FBOs prefer to speak to consumers first to establish the nature of any FHS requirements, but like to follow-up with written information to help FHS consumers make their menu choices.

3. The need for guidance on how to implement new legislation effectively. Providing businesses with tools to help them engage staff with allergen information processes would be welcomed, especially if new legislation is introduced (for example, ideas for how businesses can best prompt staff to ask customers about any allergies, like through tick-boxes on order pads, or buttons on tills).

4. FBOs need reassurance that a formalised approach to sharing allergen information does not necessarily mean creating specific dishes on their

menus for FHS consumers. This would alleviate some of the anxiety felt by businesses with lower FHS engagement who conflate a more detailed approach to allergen information with needing to expand their offer to accommodate FHS consumers. FBOs need to understand that it is about being clear as to the risks of cross-contact as well as the allergens within the dish.

5. Businesses (in particular small, independent businesses) require support to overcome the challenges posed by manual processes. A key barrier to taking a more active approach to allergen information is the time taken to manually update this information. Increasing awareness of available (and affordable) digital tools and resources (for example, QR codes to view detailed information online), could enable businesses to be more flexible in their approach.

6. There is a tension between FHS consumers' desire for a 'normal' experience and approaching FHS from an ingredient perspective, and the need for FBOs to talk to consumers about their FHS requirements in order to enact FHS processes. By reframing the ideal experience as one where FHS requirements are handled subtly and considerately by businesses, you can overcome a key consumer barrier, whilst addressing FBO requirements to follow FHS processes. This will encourage more conversations between staff and customers, which is the safest approach.

Specific recommendations for the FSA

1. Education and training are key; provide immediate support to businesses post-pandemic by drawing attention to the availability of FSA allergen training, helping them to upskill and refresh staff on this topic.

- Emphasise the free resources the FSA offers and focus on creating materials for smaller businesses in particular, where the cost of training can be prohibitive.
- Create training videos, as opposed to written documents – managers are looking for simple 'how-to' tools as they are often training staff with English as a second language, limited education, and people skills (rather than tech/literacy skills).

- Training materials should include advice about key touchpoints throughout the food ordering, production and serving process – not just the initial stage of the interaction.

2. FBOs of different sizes tend to have different views; communicate with them accordingly, tailoring communications and providing additional support to small and microbusinesses. This will help drive engagement with any new requirements or guidance.

- FBOs with >250 employees are generally more positive about potential new approaches legislation ideas, more likely to already be implementing them, and are more likely to feel these would be feasible to implement in their businesses.
- Smaller businesses, and in particular micro businesses with 1-9 employees, are more likely to think that these changes would be challenging or unfeasible for them due to time and cost implications.

3. When creating materials that will be used by all FBOs, ensure they don't have a restaurant skew, but can accommodate all the different business models in the non-prepacked sector.

- There is a sense at the moment that materials are designed with restaurants in mind, rather than the entire spectrum of businesses that prepare food for consumers eating out of home.
- This makes it harder for those other businesses to use those materials and implement any relevant changes.

Appendix

FHS consumers

FHS condition	FHS Consumer or Parent	Severity (self-identified*)	Diagnosis	Allergens	Ages	Gender	Location	SEG
Intolerance (x 5)	5 x FHS consumer	2 x severe 1 x moderate 2 x mild	3 x diagnosed by NHS or private medical practitioner 2 x Self-diagnosed	2 x dairy / milk 1 x sulphites 1 x fish 1 x nuts 1 x garlic 1x onion 1 x mango 1 x pork	3 x 18-30 2 x 51+	3 x male 2 x female	3 x England 1 x Wales 1 x NI	1 x ABC1 4 x C2DE
Allergy (x 13)	5 x FHS consumer 8 x Parent of child with allergy	5 x severe 8 x moderate	10 x diagnosed by NHS or private medical practitioner	5 x nuts 5 x dairy / milk 4 x eggs 2 x sesame	3 x 18-30 10 x 31-50	2 x male 10 x female	8 x England 3 x Wales 2 x NI	10 x ABC1

FHS condition	FHS Consumer or Parent	Severity (self-identified*)	Diagnosis	Allergens	Ages	Gender	Location	SEG
			3 x diagnosed by complementary therapist (for example, homeopath, reflexologist, online or walk-in allergy testing service)	1 x soya 1 x shellfish 1 x oil 1 x chickpeas 1 x kiwi 1 x grapefruit 1 x asparagus				3 x C2DE
Coeliac (x9)	6 x FHS consumer 3 x Parent of child with coeliac	2 x severe 7 x moderate	All diagnosed by NHS or private medical practitioner	Gluten	2 x 18-30 4 x 31-50 3 x 51+	2 x male 7 x female	5 x England 2 x Wales 2 x NI	7 x ABC1 2 x C2DE

FHS condition	FHS Consumer or Parent	Severity (self-identified*)	Diagnosis	Allergens	Ages	Gender	Location	SEG
Total: 27	16 x FHS consumer 11 x Parent of FHS child	9 x severe 16 x moderate 2 x mild	22 x diagnosed by NHS or private medical practitioner 3 x diagnosed by complementary therapist 2 x self-diagnosed	10 x dairy / milk 9 x gluten 6 x nuts 4 x eggs 2 x sesame 1 x fish 1 x shellfish 1 x soya 1 x sulphites <i>(9 x allergens outside of the main 14)</i>	8 x 18-30 14 x 31-50 5 x 51+	8 x male 19 x female	16 x England 6 x Wales 5 x NI	18 x ABC1 9 x C2DE

Non-FHS consumers

Total for all FHS conditions	Ages	Gender	Location	SEG
Total: 25	6 x 18-30	11 x male	19 x England	13 x ABC1
	11 x 31-50	14 x female	3 x Wales	12 x C2DE
	8 x 51+		3 x NI	

FBOs Qualitative sample

Type of establishment	Independent or chain	Number of employees	Role	Region	Location
13 x Restaurant	7 X Independent 6 X Chain	1 x 1-9 4 x 10-49 3 x 50-249 5 x 250+	1 X Owner 1 X Head of Quality Assurance 1 X Operations Manager 1 X Operations Chef 1 X Catering Manager 3 X Restaurant Manager 2 X General Manager 3 X Head Chef	12 x England 1 x Northern Ireland	10 X Urban 3 X Suburban
7 x Café/Shop/Deli	7 X Independent	5 x 1-9 2 x 10-49	7 X Owner	1 x England 2 x Wales 4 x Northern Ireland	3 X Urban 3 X Suburban 1 X Rural

Type of establishment	Independent or chain	Number of employees	Role	Region	Location
9 x Takeaway/Mobile	9 X Independent	8 x 1-9 1 x 10-49	9 X Owner	5 x England 2 x Wales 2 x Northern Ireland	2 X Urban 4 X Suburban 3 X Rural
12 x Pub	6 X Independent 6 X Chain	1 x 1-9 5 x 10-49 1 x 50-249 5 x 250+	4 X Owner/Co-Owner 5 X Manager/Assistant Manager 2 X Restaurant Manager 1 X Head Chef	7 x England 5 x Wales	4 X Urban 2 X Suburban 6 X Rural
7 x Hotel/ B&B/ Guest House	4 X Independent 3 X Chain	3 x 1-9 1 x 10-49 2 x 50-249 1 x 250+	3 X Owner 2 X Operations Manager / Group Purchasing Manager 1 X General Manager 1 X Executive Head Chef	6 x England 1 x Wales	1 X Urban 3 X Suburban 3 X Rural
2 x School Canteen	2 X Independent	1 x 1-9 1 x 50-249	1 X Operations Manager 1 X Chef	2 x England	2 X Suburban
3 x Care Home	3 X Independent	3 x 10-49	2 X Care Home Manager 1 X Catering Manager	2 x England 1 x Northern Ireland	1 X Urban 2 X Suburban
7 x Caterer/ Manufacturer	7 X Independent	4 x 10-49 3 x 250+	3 X Owner/Co-Owner 1 X Food Health and Safety Manager	6 x England 1 x Northern	3 X Urban 4 X Suburban

Type of establishment	Independent or chain	Number of employees	Role	Region	Location
			1 X Head of Quality Assurance and Technical & Safety Manager 1 X Catering Manager 1 X Executive Chef	n Ireland	
60 x Total	45 X Independent 15 X Chain	19 x 1-9 20 x 10-49 7 x 50-249 14 x 250+	27 X Owner/Co-Owner 3 X Quality Assurance / Health and Safety 4 X Operations Manager / Group Purchasing Manager 3 X Catering Manager 13 X General Manager / Restaurant Manager 2 X Care Home Manager 7 X Chef 1 X Operations Chef	41 x England 10 x Wales 9 x Northern Ireland	24 X Urban 23 X Suburban 13 X Rural

FBO Quantitative sample

Workplace

Base: 402	Count	% of total sample
Hotel / guest house	107	27%
Restaurant	102	25%
Pub / bar	65	16%
Café	37	9%
Takeaway	27	7%
Mobile food unit	16	4%
Leisure / entertainment	10	2%
Education	6	1%
Canteen	3	1%
Institutions (for example, defence, care homes, justice)	1	-
Hospitals	1	-
Other	27	7%

Independent vs Chain

Base: 402	Count	% of total sample
Independently owned	232	58%
Part of a local chain	40	10%
Part of a national chain	126	31%
Other	4	1%

Size of business

Base: 402	Count	% of total sample
0-9 employees	95	24%
10-49 employees	137	34%
50 – 249 employees	102	25%
250+ employees	68	17%