SECTION 8

Food Allergy and Food Safety



Food allergy and food safety

Your legal obligations to provide safe food

In addition to the Education and Care Services National Law, ECEC services that provide food as part of their service will also be required to comply with state and territory food safety legislation.

As a first step, contact your food safety regulator in the state or territory where your ECEC operates to determine to what extent the food legislation applies to you. Depending on your food handling activities and jurisdiction, one of the following scenarios is likely to apply:

1. You do not provide food as part of your service and are therefore not required to register/notify as a food business.
2. You are required to register/notify as a food business and comply with the general requirements of the Food Safety Standards.
3. You are required to register/notify as a food business and implement a food safety program.

Table 13 provides further details on the intent of the legal requirements stipulated in food legislation that may apply to your ECEC service.

Food allergen management

Effective food allergen management is essential for preventing harm to children with food allergies in ECECs that prepare or provide meals for children with food allergies. Safe food handling practices must be implemented throughout food preparation, storage and service to prevent the unintended transfer of allergens into meals intended for children with food allergies.

The National Allergy Council has developed a dedicated All about Allergens training course for ECEC. This free course provides additional guidance on food allergen management and may complement food handler training requirements that apply under relevant food safety legislation.

In addition, some Registered Training Organisations (RTOs) that deliver Food Safety Supervisor training, such as those approved by the NSW Food Authority, have incorporated the National Allergy Council's comprehensive allergen management module into their training.

For ECECs that have children with food allergies and required to have a Food Safety Program, allergen management procedures should be incorporated into the Food Safety Program.

TABLE 13: *Food safety principles and outcomes of applicable legal requirements*

Legal requirement	Food safety principles and outcomes
Not required to register/notify as a food business	ECEC services that do not provide food as part of their service are generally not considered food businesses. For example, children bring their own food from home. Some ECEC services that have very minimal handling of low-risk foods may also be in this category.
Register/notify as a food business	Enable food regulators to identify food businesses, apply risk-based regulatory oversight to ensure food safety risks are managed, and to protect public health.
Have a food safety program	Provides a systematic approach to identifying hazards associated with the handling of food, and to ensure controls are implemented to manage those hazards. This requirement typically applies to food businesses that serve food to vulnerable populations (Standards 3.2.1 and 3.3.1).
Comply with the general provisions of the Food Safety Standards	The Food Safety Standards (Standards 3.2.2, 3.2.2A and 3.2.3) set out a risk-based, preventive approach to providing safe and suitable food. The Standards detail the outcomes that must be achieved while providing food businesses with the flexibility to determine how those outcomes are met.
Appoint a Food Safety Supervisor	Ensures food handlers receive appropriate supervision and guidance to support safe food handling practices. The Food Safety Supervisor's additional recognised food safety training enhances their ability to identify, prevent and manage food safety risks effectively.
Provide food safety training for food handlers	Ensures food handlers have the knowledge and skills necessary to handle food safely and maintain appropriate food hygiene practices. This outcome may also be demonstrated through competent practice to an Authorised officer.
Keep records demonstrating food safety	Enables food businesses to monitor food handling practices, verify that food safety controls are effective, and demonstrate compliance with food safety requirements. This outcome may also be demonstrated through competent practice to an Authorised officer.

Continuous improvement and building a strong food safety culture

Complying with the food safety legislation should be more than a box-ticking exercise. While documented procedures, records and inspections are important, they are only effective when they are consistently put into practice. A food safety system is only as strong as the people who implement it every day.

When non-compliances occur, the immediate issue is often only a symptom of a deeper problem. The underlying cause is frequently related to behaviours, attitudes, leadership, communication or the overall food safety culture within the business. Addressing these root causes leads to more sustainable improvements and helps prevent the same issues from recurring.

A practical approach to continuous improvement is the Know-Do-Follow through model:

Know

Understand where your organisation currently stands.
Regularly review food safety practices, identify risks, investigate incidents and non-compliances, and encourage staff to report concerns without fear of blame.

Do

Implement meaningful improvements.
This may include improving procedures, providing additional training, strengthening supervision, clarifying responsibilities, or removing barriers that make safe practices difficult to follow.

Follow through

Monitor whether the improvements have been effective.
Review trends, verify that changes have been embedded into daily practice, and continue refining systems as new risks and opportunities are identified. Continuous improvement is an ongoing process rather than a one-off activity.

Building a strong food safety culture requires visible leadership and commitment from management, supported by adequate resources such as sufficient staffing, appropriate equipment, time for training, and effective communication. When people have the knowledge, tools and support to perform their roles safely, safe food handling becomes the normal way of working rather than a compliance obligation. A positive food safety culture encourages everyone to take ownership of food safety, speak up about potential risks, and continually look for opportunities to improve.

For resources, visit:

- Food Standards Australia New Zealand (2025) Food Safety Culture

Your food safety regulators

The primary point of contact for ECEC services regarding food safety legislation and regulatory requirements are as follows:

- **ACT:** ACT Government – Health Protection Service
- **NSW:** NSW Food Authority
- **NT:** NT Department of Health
- **QLD:** Local Government where the ECEC is located.
- **SA:** Local Government where the ECEC is located.
- **TAS:** Local Government where the ECEC is located.
- **VIC:** Local Government where the ECEC is located.
- **WA:** ocal Government where the ECEC is located.

NATIONAL QUALITY STANDARD
QA2, QA3, QA6, QA7

Reflective questions

- *How do we ensure all educators, cooks and staff understand and consistently follow each child's individual food allergy and anaphylaxis management plan?*
- *What systems are in place to prevent cross-contamination during food preparation, storage, serving and mealtimes, and how do we monitor their effectiveness?*
- *What processes do we use to verify that food provided to children is correctly labelled, prepared and served to the right child, particularly when special dietary requirements exist?*
- *How effectively do our policies translate into consistent practice during busy periods, staff absences or routine changes?*
- *What opportunities do we provide for ongoing professional learning in food safety, food allergen management and emergency response, and how do we assess staff competence?*

Managing allergies in the ECEC setting

Allergies are common in Australia – it is estimated that around one in ten babies and one in twenty school aged children has a medically confirmed food allergy, and other children may have allergies to insect stings and medications.

While most children have allergies to the common allergy causing foods (cow's milk/dairy, soy, egg, wheat, fish, shellfish, peanut, tree nuts and sesame), it is possible to be allergic to any food, including fruits and vegetables. The only way to manage a food allergy is for the child to completely avoid the food they are allergic to. Even a crumb or drop of food, or a sip of a drink can cause an allergic reaction.

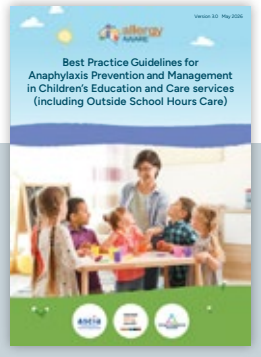
To help care for children and young people with allergies, the National Allergy Council have published *Best Practice Guidelines for Anaphylaxis Prevention and Management for Children's Education and Care (CEC) (including Outside School Hours Care)*.

The Best Practice Guidelines:

- Outline the **key principles** and recommendations for reducing the risk of anaphylaxis in early childhood education and care settings and outside school hours care services.
- A set of **resources** including templates and sample documents are available as free downloads from the National Allergy Council's website:
  Allergy Aware
- An **implementation guide** supports services to put the recommendations into place.

FIGURE 3: *Key principles for reducing the risk of anaphylaxis in children's education and care*

- Implement an allergy aware approach to preventing and managing anaphylaxis.
- Have an anaphylaxis management policy. Review this policy and associated procedures if an allergic reaction occurs.
- Obtain up-to-date medical information and develop individualised anaphylaxis care plans for each child at risk of anaphylaxis. These plans will include a copy of the child's ASCIA Action Plan.
- Educate and train staff in the prevention, recognition and treatment of allergic reactions including anaphylaxis. Educate and train staff who prepare, serve or supervise meals, in food allergen management.
- Ensure staff know which children are at risk of allergic reactions and understand that unexpected allergic reactions, including anaphylaxis, might occur for the first time in children not previously known to have allergy.
- Provide age-appropriate education of children to help raise awareness and manage anaphylaxis risk in CEC services.
- Implement reasonable and effective strategies to reduce the risk of accidental exposure to known allergic triggers and review anaphylaxis risk minimisation strategies if an allergic reaction occurs.
- Have at least one general use adrenaline device in each CEC service.
- Communicate about anaphylaxis management with CEC staff and the CEC community.
- Offer support (including counselling) for CEC staff who manage an anaphylaxis.
- Appropriate reporting if an allergic reaction occurs while the child is in the care of the CEC service.



Best Practice Guidelines for Anaphylaxis Prevention and Management for Children's Education and Care (CEC) (including Outside School Hours Care)

An allergy aware approach

When planning menus and providing food for children with food allergies, being allergy aware means doing many things to lower the chance of a child with allergies to any food having food or drink they are allergic to.

Banning food allergens and using terms such as 'nut free' is not an effective way to manage food allergies in CEC services. Food bans do not help children with allergies to other foods. CEC services may restrict peanuts and tree nuts (such as cashew, hazelnut and almond) in their menu as a risk reduction strategy. This is because peanut and nut pastes are sticky and can be transferred from hands to toys and other surfaces.

Foods that are essential foods in children's diets such as wheat, cow's milk (dairy) and egg should not be removed from CEC services.

Allergy aware children's education and care (CEC) services support staff as they work with families to reduce the risk of a child with food allergies having an allergic reaction. Children should not miss out on activities because of their food allergy – instead, plan ahead so that activities do not expose them to the food they are allergic to.

The following information provides practical guidance on how to be allergy aware.

Documentation

- When they enrol, ask families about their child's allergies and any other dietary needs. Document this in the child's individual anaphylaxis care plan along with a copy of the child's Australasian Society of Clinical Immunology and Allergy (ASCIA) Action plan.

- Use the same approach for all food allergies, regardless of the type of ASCIA Action Plan the child has.
- Parents should not be asked to sign disclaimers or waivers about possible exposure to food allergens while their child is at a CEC service.

Training

Food allergies are an important food safety issue in CEC services.

- All staff who plan, make or serve food and those who supervise children with food allergies should complete the National Allergy Council's:
  - All About Allergens for CEC free online training.
- The Managing Food Allergies in Children's Education and Care Kitchen Handbook clearly outlines how to provide food and drinks for children with food allergies and procedures that reduce the risk of exposure to their food allergens in the CEC setting:
  - Managing Food Allergies in Children's Education and Care Kitchen Handbook
- The highlighted tools and templates are available from the National Allergy Council:
  - Food allergy training resource hub

Risk reduction

Follow best practice food allergen management procedures when making and serving food:

- Use standard recipes.
- Use a food allergen menu matrix so that staff know which allergens are in your recipes and the food products used in the service. Keep the food allergen matrix up to date.
- Subscribe to food safety recalls so the service knows about products that are recalled due to undeclared allergens. Foods that are recalled should not be used in the menu.
- Do not serve foods with precautionary allergen labelling ('may be present' or 'may contain') statements for a child's food allergen.
- Know which children with food allergy will be present for each mealtime.
  - A record of food allergy and special dietary needs is filled out when a child is enrolled and updated if the child's food allergies change.
  - Use a daily attendance sheet that lists the name of each child that is attending on that day and which meals they will be present for, and shows which children have food allergies and other special dietary needs.
- Plan and make food for children with food allergies in ways that avoid cross contamination with allergens from other foods. This includes storing food, and cleaning benches, utensils, equipment and hands well before making food, in between food handling tasks, before and after handing a food allergen.
- Make food for children with food allergy at a different time or in a different space so their food does not contact other foods being prepared.
- If the food is to be stored before it is given to the child, it must be clearly labelled with the child's name and their allergy and placed in an enclosed container or covered to avoid contact with other food.

Have systems in place to make sure the right food is given to the right child

- Foods and drinks for children with food allergy must be labelled with the child's first and last name and their allergy.
- Have a clear way of identifying meals for children with food allergy – for example a coloured plate, or different shaped plate.
- The cook or chef should hand over meals for children with food allergy first to a staff member who knows the child – use the meal sign off form for allergies and special dietary needs for this handover, signed by the staff member supervising the meal.
- Serve children with food allergy first, before other children.
- Two staff members should check and sign off that the right food is given to the right child with food allergy. Use the meal sign off form for allergies and special dietary needs to confirm that the right meal is given to the right child.
- Children with food allergies should only be supervised by staff who know them well, and who have completed the All about Allergens for CEC online food allergen management training:
  - All about Allergens for CEC

Infant formula

- It is important that children with food allergies are given the right formula, and there is no contamination of their formula when it is made up. Pages 19/20 of the Managing Food Allergies in Children's Education and Care Kitchen Handbook outlines steps to take when managing infant formula for children with cow's milk and other food allergies:
  - Managing Food Allergies in Children's Education and Care Kitchen Handbook
- Two staff members should check that the right infant formula is given to the right child. Use the form for infant formula and expressed breast milk to help staff check and document that the right formula is made and given to the right child.

If an allergic reaction occurs

- All allergic reactions (where there is a risk of anaphylaxis) must be reported to the Regulatory Authority by the approved provider within 24 hours of the incident.
- Documentation of the incident should include adequate details about the event.
- After an incident or near miss, review your processes to see what changes you can make to prevent something similar happening again.

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All About Allergens for ECEC online training and support resources

Allergy Aware website

Allergy Aware website

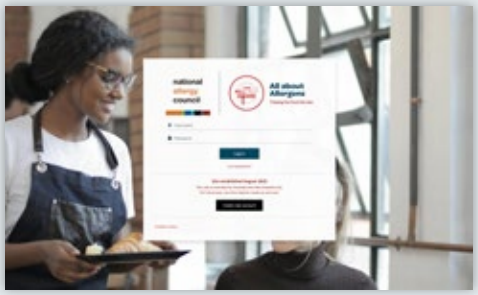
The Allergy Aware website is a resource hub that includes links to evidence-based resources and training for education and care services to help manage anaphylaxis. The website also contains links to state and territory specific information and resources. Note that the Allergy Aware website is separate from the All About Allergens Resource Hub which provides free training about managing food allergies when providing food. Further details on the All about Allergens Resource Hub can be found in the upcoming pages.



All About Allergens for CEC online training

All about Allergens for CEC

It is recommended that all staff involved in planning, ordering, making, serving and supervising meals complete the National Allergy Council's free All about Allergens for CEC food allergen management online training.



All About Allergens Kitchen Handbook

All about Allergens Kitchen Handbook

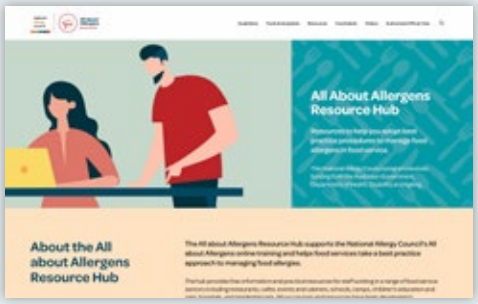
The National Allergy Council's All about Allergens Kitchen Handbook is the companion to the All about Allergens training. The Kitchen Handbook clearly outlines considerations when planning, ordering, making, serving and supervising meals for children with food allergies in Early Education and Care settings.



All about Allergens Resource Hub

All about Allergens Resource Hub

The All about Allergens Resource Hub supports the National Allergy Council's All about Allergens online training and helps food services take a best practice approach to managing food allergies. The hub provides free information and practical resources for staff working in a range of food service sectors including children's education and care.



Managing food allergies in ECEC settings is everyone's responsibility

Managing food allergies is everyone's responsibility

Everyone plays a role and needs to communicate about food allergies.

Service Manager

- Make sure all staff are aware of the risk of food allergies. This includes managers, educators, cooks, chefs and other kitchen staff.
- Make sure that only staff who are trained in food allergen management plan, order, make, serve and supervise children eating the food.
- Make sure you have a food allergy policy, and procedures for food allergen management. Audit your service to make sure the policy and procedures are followed.



Parent/Carer

When they enrol, ask parents about their child's allergies and any other dietary needs.

Parents should:

- Tell the service if their child's allergies change.
- Provide a copy of their child's ASCIA Action Plan and allergy medication.



Educator

- Know how to recognise and respond to allergic reactions.
- Know how to provide a safe environment for children with food allergies during meal and snack times.
- Plan safe and inclusive activities for children with food allergy.



Cook/Chef

- Know how to make and serve suitable food for children with food allergies.
- Know what is in the food they make and serve.
- Know which children in their childcare service have food allergies.
- Be able to answer questions from parents of children with food allergies about the ingredients of the food they make and serve. Other CEC staff should know how to find this information if they are asked for it.



All food allergies must be taken seriously

Use the same approach for all types of food allergies, regardless of the type of ASCIA Action Plan they have.

Parents should not be asked to sign disclaimers or waivers about possible exposure to food allergens while their child is at a CEC service.

Poster supplied with permission from the National Allergy Council All about Allergens Kitchen Handbook.