

# CATERING GLUTEN FREE: HOW TO GET IT RIGHT

**Guidance** for the Catering  
and Hospitality Industry

## REVISION HISTORY

Version	Revision Date	Purpose of revision
1	May 2017	Initial publication
2	December 2019	Review of guidance and update of content

## FOREWORD

I welcome Coeliac UK's effort to achieve greater consistency and compliance in relation to gluten free standards across food businesses in the UK.

Food related intolerances have a deep impact on people's lives. I know this from personal experience, as I have coeliac disease. I understand what a difference it makes when a food business gets it right: it protects our health, removes anxiety, builds trust and loyalty, and affects where we choose to buy our food.

1 in 100 people in the UK has coeliac disease. Food businesses are obliged to provide safe food. This guidance for the catering and hospitality industry is a constructive and practical help to hard-working businesses which, I know, want to do the right thing for consumers.

I believe that greater awareness of gluten free standards will benefit public health – those of us living with coeliac disease – and give us more confidence in making safer food choices when eating out.



**Heather Hancock**  
Chair, Food Standards Agency

Coeliac UK has been providing help and support to people on a gluten free diet and providing authoritative advice on gluten free provision to the food industry for over 50 years. 'Catering gluten free: how to get it right' provides fully comprehensive, free guidance for the catering industry on gluten free production and complements Coeliac UK's Gluten Free accreditation scheme and training services for the catering industry, launched in 2012.

The guidance underpins gluten free provision and aims to demystify gluten free so that caterers can better provide for customers, whether they are simply enjoying a meal out with friends and family or in schools, care homes or hospitals.



**Claire Andrews**  
Chair, Coeliac UK Food Standards Committee

# SUMMARY

## Intended audience

This guidance is for all types of food service and catering organisations that provide food for customers, patients/residents and students.

## Purpose of guidance

The purpose of this document is to provide guidance for food service and catering organisations to help them safely prepare gluten free meals. Following the steps provided in this guidance will help to reduce the risk of cross contamination with gluten at all stages of food preparation and identify any potential risks during the process. Much of this guidance will be relevant to managing general food safety and cross contamination with other allergens.

## Legislation and guidance available

- The Food Information Regulations 2014 (England, Wales, Scotland and Northern Ireland)  
[www.food.gov.uk/business-guidance/allergen-labelling-for-food-manufacturers](http://www.food.gov.uk/business-guidance/allergen-labelling-for-food-manufacturers)
- The Food Safety and Hygiene Regulations 2013 (England, Wales, Scotland and Northern Ireland)  
[www.food.gov.uk/business-guidance/general-food-law](http://www.food.gov.uk/business-guidance/general-food-law)
- Food Safety Act 1990  
[www.food.gov.uk/about-us/key-regulations](http://www.food.gov.uk/about-us/key-regulations)
- Safer Food, Better Business  
[www.food.gov.uk/business-guidance/safer-food-better-business](http://www.food.gov.uk/business-guidance/safer-food-better-business)
- FDF labelling guidance:  
[www.fdf.org.uk/corporate\\_pubs/FDF-gluten-labelling-guidance.pdf](http://www.fdf.org.uk/corporate_pubs/FDF-gluten-labelling-guidance.pdf)

## About Coeliac UK

Coeliac UK is the charity for people who need to live without gluten. We provide independent, trustworthy advice and support, strive for better gluten free food in more places, and fund crucial research to manage the impacts of gluten and find answers to coeliac disease. And we do it all so that one day, no one's life will be limited by gluten.

## Publication date

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## Review date

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# SECTION 1: INTRODUCTION

Coeliac UK has developed this guidance in collaboration with the Food Standards Agency. The aim of this guidance is to provide practical advice to food businesses preparing gluten free meals.

## 1.1 Who is this guidance for?

This guidance is designed to be used by food businesses preparing non-prepacked foods and pre-packed foods for direct sale. It is for all types of food service and catering organisations that want to label and serve gluten free food.

### For example:

- Restaurants
- Cafés
- Pubs
- Workplace catering
- Market stalls
- Mobile catering units
- Takeaways
- Fast food outlets
- Conference and event venues
- School catering providers
- University catering providers
- Hospital catering providers
- Care home catering providers

### This list is intended as a guide and is not exhaustive.

Catering organisations can vary in size and type, from a simple kitchen operation within a small café to complex operations across a number of restaurant brands.

This guidance will be relevant for managers and staff that have responsibility for and/or are involved in procurement of food supplies, food preparation, staff training, service and menu design. It is important that those with senior management responsibility understand the importance of implementing controls for gluten free food preparation and provide sufficient resources and training to manage processes effectively.

Dependent on the size and structure of the organisation, training and knowledge necessary to successfully produce gluten free meals may include personnel from several departments.

### For example:

- Catering staff
- Service staff
- Operations managers
- Procurement managers/buyers
- Food safety team
- Customer service team
- Dietitians
- Nutritionists

## **1.2 What is coeliac disease?**

Coeliac disease (pronounced see-liac) is a serious condition where the body's immune system reacts to gluten found in some foods and causes damage to the gut. Coeliac disease is not an allergy or intolerance, it is an autoimmune disease and affects 1 in 100 people in the UK and worldwide. There is no cure; the only treatment for coeliac disease is to follow a gluten free diet for life. Coeliac disease is associated with a range of recurring symptoms such as bloating, diarrhoea, anaemia, persistent mouth ulcers and fatigue. There is also a skin condition called dermatitis herpetiformis which is also associated with coeliac disease. If someone repeatedly eats gluten or their condition goes untreated, they will be at risk of osteoporosis and a rare form of small bowel cancer.

For someone with coeliac disease, accidentally eating gluten is described as being "glutened". If this happens, they are likely to experience symptoms like stomach pain, cramps, bloating, vomiting and diarrhoea over a number of hours or days. It does not cause a life threatening reaction or anaphylactic shock.

## **1.3 What is gluten?**

Gluten is a protein found in the grains wheat, rye and barley. There is a similar protein found in oats which some people with coeliac disease also react to. Gluten is commonly found in foods made from flour, for example breads, pasta, biscuits, crackers and cakes. It can also be found in less obvious foods such as ready meals, sauces, sausages and soups. Cereals containing gluten are included in the list of the main 14 allergens that must be declared when included in packaged foods and in dishes served in catering establishments. You can read more in section 3.3.

## **1.4 Why provide gluten free options?**

People with coeliac disease want to eat out like everyone else and don't want to feel excluded from their favourite restaurants. What's more, if you can safely produce gluten free meals, you will appeal not only to the growing numbers of people diagnosed with coeliac disease, but also the wider gluten free market. According to Mintel, the UK free from market is estimated to be worth £877 in 2018, with sales growing 133% from 2013-18<sup>1</sup>. It is estimated that the catering industry is missing out on an additional £100 million a year from customers wanting to eat out gluten free.

Whilst 1% of the population has coeliac disease, there are also increasing numbers of people following a gluten free diet for other health reasons and the trend looks like it is set to continue. The 1.3 million Britons now following a gluten free diet do so because it is not only the treatment for coeliac disease, but it is also followed by people with other medical conditions to treat symptoms such as irritable bowel syndrome (IBS) and non-coeliac gluten sensitivity (NCGS)<sup>2</sup>. Providing gluten free meals will bring new customers who will return time after time as the decision of where to eat is driven by the customer needing a gluten free option.

## **1.5 Producing gluten free meals**

There are key areas to consider when you are looking at providing gluten free options to safely manage cross contamination. These will be explored further within this guidance.

<sup>1</sup> Mintel Free-from Foods, UK, December 2018.

<sup>2</sup> You Gov, 2015, survey, Awareness of coeliac disease, representative survey of 2,000 British adults. All calculations completed by Coeliac UK based on You Gov survey results and Office of National Statistics (ONS) population data.

## SECTION 2: MANAGEMENT INFORMATION

### 2.1 The law on gluten free

Food businesses must be able to demonstrate knowledge of the law on gluten free and allergen labelling legislation and you need to make sure you are compliant. To label a product as gluten free you need to be sure it complies with Regulation (EU) No 828/2014, for the purposes of labelling this is the standard for gluten free which covers the absence of gluten in food. Only foods that contain 20 parts per million (ppm) or less of gluten can be labelled gluten free which applies to all foods sold in catering establishments, and all types of pre-packaged products.

For further information on how to meet the standard set out for gluten free, you can refer to Coeliac UK [www.coeliac.org.uk](http://www.coeliac.org.uk), local authority food enforcement officers and the Food Standards Agency website: [www.food.gov.uk/business-guidance/allergen-labelling-guidance-for-food-manufacturers](http://www.food.gov.uk/business-guidance/allergen-labelling-guidance-for-food-manufacturers)

### 2.2 Food Safety Management Systems

Managing your business to ensure food safety, effective management of allergens and safe preparation of gluten free meals is vital. Many of the processes you already have in place for controlling physical and microbial contamination will be relevant to controlling gluten contamination within your business.

All food businesses preparing gluten free food must have a documented Food Safety Management System or HACCP Plan which addresses the gluten hazard. The FSA's Safer Food Better Business guides can help you with this: [www.food.gov.uk/sfbb](http://www.food.gov.uk/sfbb)

#### **The HACCP Plan should cover:**

- Products and ingredients supplied to the food business
- Gluten free ingredient management and cross contamination controls
- Effective cleaning and hygiene procedures
- Effective monitoring procedures at critical control points

### 2.3 Management commitment

Management and review of food safety management systems is fundamental for food businesses. There needs to be commitment from both staff and management to deliver gluten free food. A company policy should be established which includes information on gluten free claims and the company's commitment to gluten management.

## 2.4 Reference information

All staff should understand the importance of preparing food safely and the controls required for gluten free foods. Additional reference material may be used to ensure best practice guidance is applied consistently. Recipe cards and product specifications showing ingredients and processes for preparation of gluten free meals should be made available to chefs and kitchen staff. Reference information must be regularly reviewed and kept up-to-date. The FSA offer a range of free support tools for businesses to help with this:

[www.food.gov.uk/business-guidance/allergen-guidance-for-food-businesses](http://www.food.gov.uk/business-guidance/allergen-guidance-for-food-businesses)



You should provide training for all staff on communication, preparation and serving of gluten free foods. Staff should be trained to always check and not to guess if unsure of food ingredients or the gluten free processes. Your gluten free customers will be happy to wait for the right information. Training should be relevant to the job they do, for example service staff may need different training to kitchen staff due to the difference in the way they handle allergens.

Training must cover handling, storage, segregation and accidental spillage of gluten ingredients, controls in place to control contamination with gluten at all stages of preparation, and serving of gluten free meals to customers. Training must be in place for new staff as well as refresher training available to existing staff. Training records for the preparation and serving of gluten free dishes should be retained and signed.

On the FSA website, there is a free e-learning course on allergen management which may help: <http://allergytraining.food.gov.uk/>

Coeliac UK offers cost-effective training for caterers who want to learn more: [www.glutenfreetraining.org](http://www.glutenfreetraining.org)

## 2.6 Supply chain management

You should choose suppliers carefully. It is important to use suppliers that you can trust to provide foods and ingredients that do not contain gluten. A risk assessment should be conducted on incoming ingredient suppliers based on the nature of the ingredient, place and country of manufacture, factory setting, transport routes, etc. to establish the risk of cross contamination of ingredients being delivered to you. Caterers should be aware of food fraud in the supply chain and be vigilant when choosing suppliers.

These are some examples of questions you should ask your suppliers:

- Does the supplier have a Food Safety Management System in place?
- What foods and ingredients does the supplier produce?
- Are ingredients containing gluten used on site?
- Has the supplier carried out a risk assessment in relation to ingredients that contain gluten on site?
- Has the supplier any third party certification, for example BRC, IFS or FSSC 22000?

Businesses should be able to provide evidence of supplier assurance.

Examples include:

- Supplier questionnaire
- Most recent Local Authority visit report
- Third party audit report
- Certificates of analysis for high risk ingredients.

## SECTION 3: CHOOSING THE RIGHT INGREDIENTS

The starting point for successfully preparing gluten free meals is choosing the right ingredients and foods. There are a number of options for identifying foods and ingredients that can be used to make gluten free dishes. There must be a system in place to ensure ingredients used to prepare gluten free foods are checked for gluten absence before use. This could be to refer to current product specifications or ingredient information on file or checking the ingredients list on the label.

### 3.1 Foods that do not contain gluten

There are a number of foods and food groups that do not contain gluten, for example:

- Fruit and vegetables
- Meat, fish and poultry
- Milk, plain yogurt, cream, cheese and eggs
- Butter, margarine, lard, oils, ghee
- Preserves, jams, golden syrup, treacle and honey
- Nuts, seeds, lentils, beans, pulses and rice
- Cider, wine, spirits and liqueurs

You can download a checklist of foods from: [www.coeliac.org.uk/gfdiet](http://www.coeliac.org.uk/gfdiet)

Naturally gluten free ingredients can be a good basis for menu development as dishes can be made gluten free and offer good options for all customers. Soups made from naturally gluten free ingredients and thickened with a gluten free thickening agent, for example cornflour, could be served to all customers.

### 3.2 Gluten free label

Specialist gluten free substitute foods such as gluten free bread, pasta and flours can be sourced from most food service suppliers and all major retailers. Choose products labelled gluten free. You may also see the term 'suitable for coeliacs' on products labelled gluten free. Foods labelled gluten free must meet the legal requirements for making this claim. Coeliac UK's Crossed Grain trademark provides third party assurance of gluten free status and is easy to identify on pre-packaged foods. You may also see it on bulk boxes/product data sheets from your food service supplier.

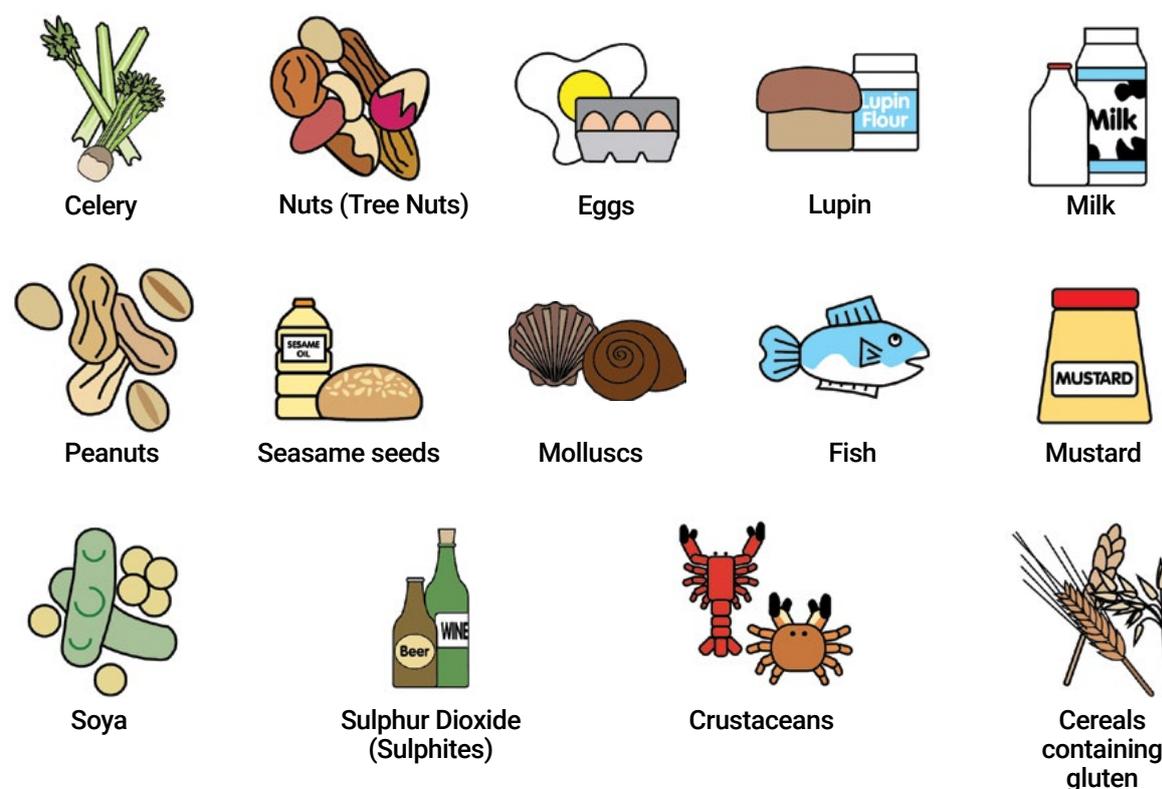


### 3.3 Allergen labelling

For products which are not labelled as gluten free, ingredient information must be available to you either on the label or specification sheets, or directly from your suppliers. Your suppliers have to provide you with information on the deliberate inclusion of any of the 14 main allergens (the grains wheat, rye, barley and oats are one of these allergens). These will be emphasised in the ingredients list for example in bold. Products containing wheat, rye, barley or oats in the ingredients should not be used when preparing gluten free meals, unless they are labelled gluten free and the food contains 20ppm of gluten or less. Oats that are labelled gluten free can be eaten by most people with coeliac disease.

You can access information on foods that don't contain gluten on the Coeliac UK website, visit [www.coeliac.org.uk](http://www.coeliac.org.uk)

### The 14 major allergens



### 3.4 'May contain' labelling

Food Standards Agency guidance is available which provides manufacturers with advice on using appropriate precautionary allergen labelling (eg 'May Contain' labelling). Where a risk of contamination with gluten has been identified during the manufacture or transportation of a product, a 'may contain' statement should be displayed on the label. Products labelled with a statement such as 'may contain gluten' or 'may contain wheat' should be avoided in the preparation of gluten free meals. FDF labelling guidance can be downloaded at:

[www.fdf.org.uk/corporate\\_pubs/FDF-gluten-labelling-guidance.pdf](http://www.fdf.org.uk/corporate_pubs/FDF-gluten-labelling-guidance.pdf)

## SECTION 4: INCOMING INGREDIENTS

### 4.1 Ingredient checks

A system must be in place to monitor incoming products and ingredients to ensure any changes in gluten content are identified. If suppliers do not notify you of ingredient changes, there needs to be a system in place to manage this on site. Records should show that incoming ingredients are checked by staff for their gluten status. If a delivery arrives where the packaging is damaged leading to the possibility that the ingredient or food products may be contaminated with gluten, they should be returned. If contingency/alternative suppliers are used, then there must be a system in place to record ingredient details and presence of gluten. Staff need to be aware of the process for contingency purchasing.

### 4.2 Storage

Storage conditions must be suitable to ensure product identity and prevent cross contamination. Gluten free ingredients should be stored in clearly marked containers or dedicated shelved above gluten-containing ingredients so that risk of cross contamination with gluten containing ingredients is removed.

Once opened, all products must be decanted into clearly labelled lidded containers.

Storage containers must be cleaned prior to and after use.

Businesses must be able to demonstrate control for accidental spillage of gluten ingredients, for example wheat flour in storage areas. Spillage must be cleaned up immediately using single use cloths.

## SECTION 5: CLEANING AND HYGIENE

### 5.1 Cleaning

Effective cleaning is essential to ensure that gluten free foods are not contaminated during storage and preparation. Cleaning schedules must account for all areas where gluten free ingredients/dishes are prepared and stored.

Either use dedicated utensils/equipment, clearly labelled, or clean utensils must be used for gluten free preparation. You should use either commercial, domestic dishwashers or effective manual washing practices (hot soapy water to wash, then rinse with hot, clean water) to remove gluten from utensils and equipment and use single use cloths to dry. There is further information about cross contamination of equipment under 6.3 cooking, pg 15.

Clean surfaces must be used for gluten free preparation.

A two stage clean is recommended. The first stage is a general clean of the surface or equipment using a suitable detergent to remove visible dirt, food particles, grease and debris, followed by rinsing



to ensure removal of these residues. Surface cleaning should also include disinfection to ensure that any bacteria present are reduced to an acceptable level, and should be followed by rinsing. Use single use cloths to prevent spreading gluten across the surface.

Example cleaning schedules can be found in Safer Food Better Business [www.food.gov.uk/business-guidance/safer-food-better-business](http://www.food.gov.uk/business-guidance/safer-food-better-business).

### 5.2 Personal hygiene

Food handlers must wash their hands before food preparation and in between preparation and use of gluten free products and those containing gluten. Standard hand washing procedures should be used, with hand washing sinks available and convenient to use.

Staff clothing must be suitable for preparation of gluten free food. Clean protective clothing should be available and staff should know where to find it. Clean staff clothing may not be required in every site, dependent on contamination risk, for example clothing covered in flour would present a contamination risk when preparing gluten free meals.

# SECTION 6: PREPARATION OF GLUTEN FREE MEALS

## 6.1 Preparation area

The preparation area available for gluten free food should be designed to minimise cross contamination. If possible, gluten free preparation should be separate from areas for preparation of foods containing gluten, particularly if high risk ingredients are being used, for example wheat flour. Work flows should be identified avoiding potential cross contamination issues, including factors such as time, distance, staff, equipment and utensils.

## 6.2 Preparation

Cross contamination can occur at various stages of preparation. Bread boards for gluten free bread should be separate to those used for gluten containing bread to avoid cross contamination with crumbs. Unused gluten free products and pre-prepared gluten free ingredients must be clearly labelled and securely covered to allow identification for the next shift.

You must ensure that utensils, knives and equipment used for gluten free preparation are clean, or dedicated for gluten free use only

The use of a probe thermometer must be controlled to prevent cross contamination of gluten free and gluten containing foods. Either a separate probe should be used and clearly labelled, or a shared probe should be cleaned between uses using probe wipes and/or detergent with force to remove food residues.

## 6.3 Cooking

Cross contamination risk or preparation/cooking method must be controlled during cooking:

- **Shallow frying** – oil used for frying gluten free foods must not have been used for cooking foods containing gluten
- **Deep fat frying** – use a separate fryer for gluten free or clean oil in a clean pan
- **Toasting** – gluten free bread must be toasted separately to standard bread. This can be achieved by using a separate toaster for gluten free, using a clean grill or using toaster bags for gluten free bread
- **Griddling/grilling** – a clean grill should be used to grill gluten free foods. A separate griddle or dedicated area of the griddle must be used and segregation allowing clear identification of gluten free areas. Where this is not possible, a clean pan can be used instead
- **Oven cooking** – gluten free items should be cooked in the oven above gluten containing items if cooked at the same time. Gluten free foods such as pizzas and breads must not be placed directly on oven surfaces but placed on clean baking trays

- **Fan ovens** – where fan ovens are used and foods being cooked are made from ingredients that could circulate in the oven, for example flour or flaky pastry, gluten free foods should be cooked separately to prevent cross-contamination
- **Basting** – separate bastes and basting brushes should be used for gluten free preparation
- **Flour use** – gluten free meals can be prepared in kitchens where wheat flour is used but care must be taken to manage cross contamination. Although kitchens vary and must be considered individually, if you have a minimum of 2 metres in between where you are preparing gluten free meals and where wheat flour is being used, together with good hygiene practices, it is possible to prepare gluten free meals.

For more information on gluten free cooking where flour is being used visit:  
[www.coeliac.org.uk/catering-research](http://www.coeliac.org.uk/catering-research)<sup>3</sup>

### **Common cross contamination issues**

- Surfaces not being cleaned prior to gluten free preparation
- Sharing utensils, equipment and chopping boards without cleaning before using for gluten free foods
- Using oil or water for cooking gluten free foods previously used to cook foods containing gluten
- Using the same bread boards, toasters and grills for gluten free and foods containing gluten
- Staff not washing hands prior to gluten free preparation
- Staff not using appropriate protective clothing, for example a plastic apron

<sup>3</sup> Miller K, McGough N, Urwin H. 2016 Catering Gluten-Free When Simultaneously Using Wheat Flour. Journal of Food Protection, Vol. 79, No. 2, 2016, Pages 282–287

## SECTION 7: SERVING GLUTEN FREE MEALS

### 7.1 Providing information to customers

All food businesses must by law be able to provide customers with information on any allergens including cereals containing gluten (namely wheat, rye, barley, oats and their hybridised strains), for prepacked, prepacked for direct sale and non-prepacked (loose) food and drink. This is as a result of the EU Food Information for Consumers Regulation (1169/2011).

For non-prepacked (loose) food you can provide information in oral or written formats such as using an allergen menu or reference guide, the way you decide to present this information must be suitable for the consumer. Where the information is not written and upfront, you must clearly signpost to where the information can be found. Businesses choosing to provide the information orally must ensure that there is a written notice, menu, ticket or label that is clearly visible, at the point that the customers choose their food, to indicate that allergen information is available from a member of staff.

If you are selling pre-packed foods these must have an ingredients list and the allergenic ingredients must be clearly emphasised.

If you are a food business that sells pre-packed foods for direct sale (PPDS) from 1 October 2021 these foods will need to have a label with a full ingredients list with allergenic ingredients emphasised within it. For more guidance about the rules for labelling PPDS please visit :

[www.food.gov.uk/business-guidance/allergen-information-for-prepacked-for-direct-sale-food](http://www.food.gov.uk/business-guidance/allergen-information-for-prepacked-for-direct-sale-food)

If you are serving gluten free meals, you must have a system in place to provide customers with clear information about what dishes on the menu are gluten free. You can either have a separate gluten free menu or choose to label individual gluten free dishes on your main menu.

Menus and other food information provided by the business must comply with the legislation on providing allergen information and on gluten free claims.

Gluten free menus must not include contradictory disclaimers, for example 'items on this menu may contain gluten' or include descriptions relating to other statements such as 'No gluten-containing ingredients' (NGCI). Food businesses should encourage customers to discuss gluten free requirements with staff. This could be indicated on the menu, website or on signage, for example if you have a separate gluten free menu, you should signpost from your main menu to make customers aware.

A system of communicating changes in gluten status of ingredients, menu changes or other factors affecting serving gluten free dishes must be in place to ensure that accurate information is provided by staff to customers. This could be through staff meetings, daily briefings, or sending memos to notify when dishes change in relation to gluten status.

## 7.2 Communication between back and front of house

Businesses must have an effective system of communication between front of house and back of house for gluten free meals to make sure that when a customer orders a gluten free meal, a gluten free meal is served. When a customer orders a gluten free meal there must be a process for communicating the order to the kitchen. This could be a code on the till system to identify a gluten free requirement on a printed docket or hand written, or verbal instructions from the server taking the order to the chef. If online ordering is available, a communication system must be in place between the online order and kitchen production.

## 7.3 Serving guidance

Separate, clean utensils must be used for gluten free dishes. Dedicated serving utensils may be beneficial in some situations where they can easily be kept apart, for example in a fish and chip shop with separate fryers, one for gluten free and one standard. If this approach is used, a system must be in place to ensure that the correct utensils are used.

Hot holding and cold holding service conditions need to be suitable to ensure product identity and prevent cross contamination. Gluten free dishes should be kept physically separate from dishes containing gluten to avoid cross contamination. Gluten free dishes must be clearly distinguishable. Separate, clearly labelled utensils must be provided for gluten free dishes.

### Service Tips

- Colour coded utensils can be used to serve gluten free dishes
- Make it easier to identify gluten free meals by using an easily identifiable serving plate, for example serve gluten free on a square plate or a board
- If you are serving pasta, use a different shape for gluten free
- If you are serving pizza, use a different shape base for gluten free

## SECTION 8: QUALITY ASSURANCE AND VERIFICATION

### 8.1 Internal audits

Internal audits can provide an opportunity to check that agreed processes and procedures are being followed and are working, and that staff training is effective in delivering the required controls across the business. Frequency of internal and external auditing will depend on the risks of contamination, ingredients and processes used in your kitchen. For example if the kitchen handles very few ingredients containing gluten, then the frequency will be significantly less compared to kitchens using multiple ingredients containing gluten. Coeliac UK's accreditation scheme includes annual unannounced audits against the gluten free standard.

See [www.coeliac.org.uk/catering](http://www.coeliac.org.uk/catering) for more information.



### 8.2 Sampling and analysis

The law on gluten free claims states that the term can only be used on packs of food or meals served that contain no more than 20 parts per million (ppm) gluten. As with internal audit, the frequency of sampling and testing will depend on the risks of contamination, ingredients and processes used in your kitchen.

It is not necessary or practical to test every meal that you serve. The most practical way to manage producing gluten free meals is to make sure the ingredients you are using do not contain gluten, and that the risk of cross contamination with gluten is managed from start to finish. You can use this guidance to look at each stage of preparation and identify areas you need to change.

Using a laboratory to carry out testing of meals you are serving as gluten free can be a good way to verify whether the processes you have in place are sufficient to produce gluten free meals within the legal limits. A plan for sampling and analysis based on a risk assessment is a good place to start and should be based on worst case scenario. Focus on critical points in preparation of food, for instance high risk ingredients or preparation processes; a good laboratory should be able to provide guidance on the sampling plan. The results from testing could highlight areas in the preparation process where contamination with gluten could occur (for example ingredients or the preparation environment) so you can look at possible causes and address these.

If you are new to gluten free preparation, it is advisable to build your level of confidence that you can consistently be below the 20 ppm limit. Once you have this level of confidence, then the frequency of testing can be reduced. You may however, want to test meals periodically to check that your processes and training are still effective.

You must use the recommended method of analysis. There are two types of tests you can use – the R5-sandwich ELISA (Mendez Method) is used for most foods and drinks. The R5-competitive ELISA (Mendez Method) is recommended for foods and drinks which contain hydrolysed gluten, for example beers, soy sauce and sourdough. It is strongly recommended that you use a UKAS accredited laboratory which is accredited for gluten testing and seek advice on the sampling protocol for your testing. To find a laboratory that can carry out gluten testing using a validated method, visit the UKAS website [www.ukas.com](http://www.ukas.com)

It is worth noting that although the legal limit for gluten free is 20 ppm or less, many food producers choose to set a lower level of acceptance of less than 10 ppm; the reason for this is that all analytical tests have an associated margin of error (uncertainty of measurement) and in the case of ELISA this can be up to +/- 30%. By adopting a lower acceptance criteria, this ensures that this margin of error is accounted for and the meals you produce will be legally compliant.

### **8.3 Complaints**

Any customer complaints should be logged and investigated and processes reviewed and updated where any issues are found. You should log a clear description of the complaint and any relevant time and dates to allow you to investigate whether there is a problem.

A complaint may highlight an issue that needs a change in the way you do things or a problem with an ingredient from one of your suppliers.

Staff need to know how to deal with and respond to complaints from customers, and how to act on them.

## SECTION 9: GLOSSARY

BRC	British Retail Consortium
ELISA	Enzyme Linked Immunosorbent Assay
FSA	Food Standards Agency
FSSC 22000	Food Safety System Certification 22000
GF	Gluten Free
HACCP	Hazard Analysis and Critical Control Points
IBS	Irritable bowel syndrome
IFS	International Featured Standard
NCGS	Non-coeliac gluten sensitivity
NGCI	No gluten-containing ingredients
UKAS	United Kingdom Accreditation Service

## SECTION 10: WHERE TO FIND MORE INFORMATION

Coeliac UK

[www.coeliac.org.uk](http://www.coeliac.org.uk)

For further information about this guidance please email

[generalenquiries@coeliac.org.uk](mailto:generalenquiries@coeliac.org.uk)

Food Standards Agency

[www.food.gov.uk](http://www.food.gov.uk)

Your local Trading Standards office

[www.gov.uk/find-local-trading-standards-office](http://www.gov.uk/find-local-trading-standards-office)

British Dietetic Association

[www.bda.uk.com](http://www.bda.uk.com)

Hospital Caterers Association

[www.hospitalcaterers.org](http://www.hospitalcaterers.org)

National Association of Care Catering (NACC)

[www.thenacc.co.uk](http://www.thenacc.co.uk)

Reading Scientific Services Limited (RSSL)

[www.rssl.com](http://www.rssl.com)

UKAS

[www.ukas.com](http://www.ukas.com)

# ANNEX 1: COELIAC UK'S GF ACCREDITATION SCHEME AND TRAINING

## How Coeliac UK can help caterers

We offer great online training courses as well as widely recognised and trusted GF accreditation scheme for those in the private hospitality, education and health sectors.

For more information on our catering services, visit:

[www.coeliac.org.uk/catering](http://www.coeliac.org.uk/catering).

## GF ACCREDITATION

We developed our GF accreditation scheme to help caterers capitalise on the growing demand for gluten free menu options, whilst providing customers with the assurance they were looking for that venues were able to produce and serve safe gluten free food.



Since launching in 2012, over 3,400 venues have gained GF accreditation and are seeing the business benefits as well as great PR and feedback from customers. We know from research with our members, that people feel safer eating in accredited venues, knowing that there are strict controls and training in place to ensure safe menu options.

To gain GF accreditation, businesses first complete an application form. We then confirm costs and issue a contract before arranging an on site audit(s). Our Food Policy team call ahead of the audit to run through everything and make sure that businesses are fully prepared. Help and advice is given if needed at this stage. Once businesses pass the audit(s), they are announced as accredited partners through our communication channels with members and those interested in eating gluten free. There are many benefits such as inclusion in our eating out Venue Guide and Gluten Free on the Move mobile app as well as featuring on our website. For more information on the scheme, visit: [www.coeliac.org.uk/catering](http://www.coeliac.org.uk/catering).

Since gaining GF accreditation in 2012, we have been delighted with the success of our gluten free menu. Customer feedback has been overwhelmingly positive and business levels have exceeded our expectations.

Rupi Zani, Head of Quality and Safety, Pizza Express

## ONLINE TRAINING

We offer great online training courses for the private, education and health sectors so that everyone can learn how to safely cater for the gluten free diet.

For more information and to register for the training, please visit: [www.glutenfreetraining.org](http://www.glutenfreetraining.org) or contact [cateringtraining@coeliac.org.uk](mailto:cateringtraining@coeliac.org.uk) for more information.



Coeliac UK is the charity for people who need to live without gluten. We provide independent, trustworthy advice and support, strive for better gluten free food in more places, and fund crucial research to manage the impacts of gluten and find answers to coeliac disease. And we do it all so that one day, no one's life will be limited by gluten.



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🌐 [coeliac.org.uk/food-businesses](https://coeliac.org.uk/food-businesses)

🐦 @CoeliacUK\_Food

🌐 [linkedin.com/company/coeliac-uk](https://linkedin.com/company/coeliac-uk)

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[www.coeliac.org.uk](https://www.coeliac.org.uk)