

Managing allergens in a digital world

Severe allergic reactions to food are increasingly in the news, with a trend towards problems with fast food or meals ordered via our phones. Darryl Thomson describes the ideal from the 'smartphone' customer perspective as well as how to meet the rising expectations of these new masters of the food universe.

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You may not know it, but you are already a Master of the Universe!

Anybody involved with the management, training or enforcement of food safety in the out of home sector will be aware of the concern around the management of allergens. The publicity around recent incidents, particularly the inquest in September 2018 into the death of Natasha Ednan Laperousse and the recent inquest into the death of Owen Carey, both from a severe allergic reaction, has made many senior managers in food businesses sit up and take notice, and seek assurance that their allergen management systems are robust.

The challenge of ensuring that customers with food allergies can dine out safely is both daunting and complex. Many ingredients in a confined space, a frantic pace of food ordering and preparation, and the capacity for miscommunication are just some of the pressures that make it difficult to ensure a customer with an allergy is served food that is safe.

That complexity is increasing with the introduction of third-party delivery companies, delivery only food brands

and the development of food information systems including allergen apps and interactive websites. Food data systems are playing an increasingly important role in allergen safety.

So, what does the future look like and how can we ensure that food and food information is safe for people with allergies?

Having spent 36 years working in the pub restaurant sector, I have developed the habit, when considering any business challenge, of always starting with the customer. That is how you survive in a highly competitive customer facing business. The customer is a very good place to start.

I am reminded of a radio interview I heard earlier this year with Stuart Rose, Executive Chairman of Marks & Spencer from 2008 to 2011. He made an interesting comment, I paraphrase;

You will be aware that in the retail sector they have a saying, 'the customer is king'. If you want to be successful in retail you must treat the 'customer as king' otherwise, as a business, you will not

survive. Today, this is no longer true; the customer is no longer king. A business will no longer survive by treating the customer as king. In 2019, the customer is now the 'master of the universe'.

We can all instantly be aware of what Stuart Rose was talking about. The

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power of the smart phone provides customers with previously unknown levels of choice and transparency. Using their smartphone, customers can walk into a store and demand a price match with any other retailer and if refused, within a few minutes order the same product for next day delivery from somewhere else. If a product is out of stock or the correct size is not available, the customer can order the same product for next day delivery from a competitor.

The digital revolution has transformed many industries, the transformation of the music industry being one of the earliest and most dramatic examples. For many years, it looked as though the dining out industry might escape the impact of the digital revolution. After all, you had to physically go to the destination to enjoy a 'meal out', and the service and ambience is part of the meal experience that the customer is paying for. The 'meal experience' is not something that can be replicated online.

That was until the delivery companies such as Just Eat, Deliveroo and Uber Eats entered the market. These market disrupters came in-between the customer and the restaurants and offered the 'master of the universe' new levels of choice and convenience. No longer is the customer restricted to eating restaurant food in a restaurant; the restaurant chains were quick to realise that for a growing population of their customers, the 'main interface' was becoming that digital space in-between the restaurant and the customer, accessed via smartphones. Loss of control of that customer interface makes the restaurant companies uncomfortable as they feel at the mercy of delivery companies.

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In these circumstances, restaurant companies need to rely on the strength of their brands and customer brand loyalty or risk the strength of the brand being eroded over time through diluted exposure caused by the new customer interface. That is why we are now seeing the emergence of two strategies: the first is for companies to develop their own delivery systems and to bypass the delivery companies (Nandos). Second, companies such as TRG are developing 'virtual' or 'delivery brands', such as 'Bang Bang Burrito', which exist on the Internet with no physical restaurants. Instead, the food is produced from other branded restaurants. In this way, the restaurant company seeks to regain control of the customer interface.

So, what are the implications of these developments for food safety and legal compliance? What will happen in the coming years that will impact upon customer safety, and how does legislation and enforcement need to keep up? We are all customers, we are all 'masters of the universe', including myself. Using my smartphone, I expect to be able to see a list of the restaurants and delivery brands and their menus in my location. As master of the universe, I expect to see menus personalised to my own profile that I have entered previously. If I have an allergy, I expect the menus to be tailored to only show those dishes that I can eat. I also want to be able to see those dishes that can be easily and safely modified to meet my requirements. By the way, once I have entered my allergy on to my profile, I do not expect to have to let anybody know again. The restaurants should capture this information and respond accordingly each time I book a table or order food.

I expect the Food Hygiene Rating to be displayed on the screen and for this to be mandatory. A good rating will show the food is safe and fits its description. It will also indicate that good allergen management practises are in place. The restaurants should provide information on the risk of cross contact in the kitchen, so that I can decide whether it is safe for me to either eat there or order food from there. This includes a 'kitemark' or some other accreditation that shows the food technical data- that

is, the allergen, nutrition, dietary, ingredient and provenance information- has undergone thorough checks and is robust, accurate and up to date.

Of course, while the menu I see has been personalised to my requirements, other people will also see tailored menus. My wife is a type 1 diabetic, so her menu will show the carbohydrates in each dish, and calculate the total for her choice of starter, main, desserts, drink and side orders. My sister has Crohn's disease and my friend's daughter is pregnant, so they will both expect to see individual tailored menus. People of other religions will also see tailored menus. In short, we will enter the age of 'dynamic menus', where the food offer is tailored to individual dietary, clinical, religious or lifestyle choices.

In addition, there are times when I just fancy some fish and chips, or perhaps a curry. As master of the universe, I expect to be able to use my smart phone to identify those food businesses in the area which serve these dishes.

Apart from the new virtual brands, which only provide a delivery service, on each occasion I will have a choice of either visiting the restaurant to eat, ordering the food and collecting it as a takeaway, or having the food delivered. In order to help my decision, I expect to see what other activities or experiences are available in the restaurant. For example, my local pub may be showing the football on screen or have live music, or a quiz night. I may therefore decide to go to the pub so I can eat and watch the football in a more sociable atmosphere. In which case, I will visit with my neighbour, who is disabled, and so I expect to see information on disability access, parking and so on. I shall book my table on my smart phone and perhaps place my order in advance.

When I arrive at the restaurant or pub, my smart phone will let the waiter know, who will be aware of my dietary requirements and inform the kitchen and will have my table with my favourite bottle of wine ready for me. At the end of the meal, I do not expect to have to ask for the bill, but I will pay using my smart phone. I am happy to leave a review online, but I expect to be rewarded for doing so. Alternatively, I could choose to have the food delivered, in

which case I also expect the restaurant to be aware of my dietary requirements and to prepare my food accordingly. I expect the food to be hot, safe and of good quality. I shall order a bottle of wine and I do not expect the delivery person to hand over the wine to anybody in the house who is less than 18 years old.

The scenario I have described is close to current reality but also some way off and futuristic. This is because restaurant companies have been quick to invest in the commercial systems, that is, those that manage the selling, payment and delivery of food, but have been slow to invest in the food attribute data systems. These companies want to 'piggyback' food data on to the commercial systems, but this is rarely successful. The food data are much more complex and of a different nature to the commercial data and do not easily integrate into the commercial database. Usually, the sales, order and payment systems are in place and robust, but the food data are not yet available as part of the system and may not yet be robust and kept up to date.

The scenario I have described above is based on systems driven by data and therein lies the challenge for the operators, safety and enforcement. Particularly in relation to allergen data, it is vital that the data is accurate, robust and up to date. Checks are required throughout the food supply chain from supplier competency, through ingredient and allergen declarations, the aggregation of data in the recipe for the dish and the service of accompaniments. During the food development phase, changes will occur, and these must be tracked and updated. One of the challenges of these data systems is that changes flow through the data system at a different pace to which the product flows through the supply chain.

Often, it is where the data meets day-to-day human behaviour that the system can break down and so the data must also take into account and reflect the day-to-day practices in the kitchen. Inevitably, things will go wrong; orders are delayed, food runs out and chefs buy locally, potentially introducing an additional allergen. Where a dish has been modified by food development and an ingredient has had an allergen

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removed there may well be residual stock of the old allergen-containing product in the freezer.

The point is that data systems that drive apps or websites are not a total solution for allergen management. They are in effect a replacement for the 'allergen folder' that allergic customers must sift through when dining out. The data system must form part of a comprehensive allergen management system which includes policies on local purchasing, residual stock, a complete service cycle including clear responsibilities for who will see the order through to completion, as well as cross-contamination measures in the kitchen.

The role of the data remains essential, forming a critical control point, with its

own gateways and checks and with the ability to keep the data up to date and relevant. In the same way that Food Safety Practitioners use a flow diagram and identify critical control points for food safety, a similar exercise is required to ensure 'data safety'.

One criticism of these allergen apps and data systems is that they can discourage communication between the customer with the allergy and the server. This is not necessarily the case. A well-designed app can use messaging to encourage the customer to speak to the server both when the app is used and when the customer arrives at the restaurant. These information systems are a tool which, like everything else, can either be used effectively as part of a well-designed food

safety management system or misused as part of a poor system.

The bottom line is that increasingly people are living their lives through their mobile phones and they want to be able to interact with restaurants and manage their allergies through their device. Also, if you look at the ages of the fatalities in recent years caused by allergic reactions when eating out or ordering food deliveries and take-aways, there is a bias towards young people, exactly the age group who rely most heavily on their mobile phones. Whether we like it or not, food information is increasingly communicated on digital platforms and so checking that the data systems that drive that information are robust is part of ensuring that the food served is safe and what it says it is.

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