



OWNERS GUIDE TO OFFERING SAFE GLUTEN-FREE DINING

For owners of all restaurants, including individual franchisees/licensees of a large or small chain

Charlie's Table Oasis Food Safety Guidelines are made up of nationally recognized standards for gluten-free food safety to help assure your gluten-free offerings are indeed gluten-free. They also help make your customers who desire to eat gluten-free for any reason feel like cared-for guests, likely to become repeat customers who bring friends and family with them.

As a reminder, while everyone who asks for gluten-free food for any reason must be treated with respect -- for the millions of people who have celiac disease, eating gluten-free is *not* a choice. It is a medical treatment.

While there is no guarantee against an accidental glutening, proper food safety training will help ensure that you reduce the cost of waste and the embarrassment (and possible legal liability) for glutening a customer.

The Owners Guide is divided into the following sections:

- All restaurants that serve gluten-free food
- Restaurants that serve 100% gluten-free foods
- Restaurants that serve gluten-free food as part of its offerings
- Chains

ALL RESTAURANTS

Make a commitment: For safety, create a culture that values risk management. Start by committing to adhering to the guidelines included in the Charlie's Table Oasis Gluten-Free Food Safety Restaurant Program in every detail, and to keep up to date as we all learn more.

Keep in mind that more than one in ten managers and staff incorrectly believed that someone with a food allergy could safely eat a small amount of that allergen¹ – and yes, a person who has a reaction to ingesting gluten is considered to an allergen.

Additional safety procedures:

- Check for specific state and local laws in case they require additional or conflicting procedures with respect to allergens in general or specifically about gluten. For an overview of such laws, see: www.foodallergy.org

¹ Total Food Service, March 2022 p. 14



- Feel free to add additional safety measures with respect to gluten beyond those described in our Guides and Training Program.

Appoint a supervisor: Appoint one or more staff members to oversee adherence to the Program on a day-to-day basis, by monitoring all activity which could involve gluten-free ingredients and meals, correcting wrong behavior, and reporting a problem to you immediately.

Training Materials: Charlie's Table Oasis Gluten-Free Food Safety Restaurant Program [training materials](#) are available online and can be downloaded, depending on your preference, as well as in both English and Spanish. (If you desire additional languages, please let us know: info@charlietableoasis.org. As you will see, the materials attempt to humanize the situation for your employees so that they understand the guidelines aren't just arbitrary rules -- they are to keep people like your employees safe..

Establish procedures for the training materials

- ❖ At the start of the Program, the training materials should be shown, or a hard copy given to **all** staff followed by a quiz for each person. Write down the training date, the names of the staff members that were trained, and how the training was done – for example watched a specific video.
- ❖ The training materials must be shown or provided to all new hires as part of their new hire training. This includes people in purchasing, receiving, the storage area, prep area, the kitchen and front of house. Add dates to the above records.
- ❖ The training video must be replayed or materials reviewed every six months for every staff member. This can be done as a group or individually, depending on your circumstances.
- ❖ Develop a procedure to inform each team member about changes in any area affecting gluten-free food including purchasing, receiving, storing, recipes, cooking and serving.

Glutening: In the event a customer believes he or she to have been glutened in your restaurant, our website includes a “Glutening Button” which leads to questions about details of the glutening, to whom it was reported in your restaurant and the restaurant's response. You will be notified about use of the button with an opportunity to respond.

To help maximize keeping your customers safe, it is advisable to develop a procedure for dealing with reports of suspected from gluten contamination from customers or other parties who do not utilize our glutening button. Include and maintain records of an investigation and corrective actions, if any.

Outside food:

- ❖ If your restaurant is 100% gluten-free, do not allow employees, delivery people, contractors or others to bring their own non-gluten-free food, ingredients or beverages onto the premises.
- ❖ If your restaurant is not 100% gluten-free, do not allow non-gluten-free food or beverages in areas dedicated to be gluten-free



Questions, Comments, Ideas: [Click here to contact us.](#)

Reports: Report to Charlie's Oasis within thirty (30) days of the occurrence:

- ❖ Change in ownership
- ❖ Discontinuance of all or any part of the Charlie's Table Oasis Gluten-Free Food Safety Restaurant Program

OWNERS OF A RESTAURANT THAT SERVES GLUTEN-FREE FOOD AS PART OF ITS OFFERINGS

Menu planning: When updating your menu:

- ❖ Keep in mind:
 - Cooking from whole unprocessed food minimizes risk.
 - When considering alternatives to wheat, there currently is no single flour that can replace wheat flour.
 - Gluten-free foods can be served to all your customers. For example, the same meal could show up in both the gluten-free and regular portions of your menu. A gluten-free meal in a regular section of the menu does not have to be noted as gluten-free.
- ❖ Compile ingredient labels for all your gluten-free recipes. Keep them handy in case a customer asks a server.
- ❖ On the menu
 - It is helpful if all items which are gluten-free are grouped together in a separate section of the menu. If gluten and gluten-free items are listed together, be sure it is clear which is which.
 - Oats are often contaminated with gluten due to cross-contact. If one of your meals contains oats, it would be helpful to add that they are Purity Protocol (a safe method of processing).
 - If there is wheat in a meal, (wheat starch for example), note it on the menu even if it is gluten free. Some people with celiac disease also have a wheat allergy.

Purchases: Give a copy of the [Purchasing Guide](#) to each person in charge of purchasing/ordering and ask that the procedures described in the guide be followed closely.

Depending on the size/layout of your premises and your budget, consider purchasing or creating the following:

- ❖ A separate storage area for gluten-free supplies. If not practical, build shelves on which gluten-free supplies can be stored above supplies with gluten.
- ❖ To make easier in the kitchen, consider purchasing:
 - A separate toaster for gluten-free toast.
 - A separate panini press for gluten-free paninis.



- A separate colander for gluten-free pasta.
- Dedicated cutting boards (marked to indicate to be used for gluten-free only).
- Identifiable cooking utensil such as knives, rolling pins, tongs and whisks. An easy way to code items is to add a colored mark. Green is common.
- A separate set of electric appliances such as blenders which are difficult to clean between each use.
- If you use a char grill, instead of buying two, consider purchasing a griddle pan. (Char grills are difficult to clean completely of gluten.)
- It would save a lot of ongoing time (and money) if you purchased a separate:
 - Refrigerator for gluten-free supplies and food. (While gluten-free foods could be stored on top shelves to avoid cross contact, mistakes can happen when people move quickly or are tired.)
 - Oven (A separate oven is especially useful if you make pizzas.)
- ❖ Additional items useful in helping to create gluten-free safety:
 - Different color or shape serving plates and bowls that can be dedicated to gluten-free use
 - Disposable gloves and aprons
 - Plastic wrap (to help tightly secure containers that do not have lids)
 - Squeeze bottles for dressing and condiments
 - Tinfoil or parchment
 - Tongs

Procedures:

- Check all gluten-free supplies on premises that are supposed to be gluten-free to be sure they are indeed gluten-free in accordance with the [Purchasing Guide](#). Destroy or give away all items that are supposed to be gluten-free but aren't.
- Check remaining supplies to assure there has been no cross-contact which could lead to cross-contamination. For example, are the tops of sacks open so flour with gluten could travel through the air and contaminate gluten-free flour?
- ❖ Keep written information in English and Spanish (and other languages your employees may speak as their first language) about cleaning hard to clean equipment near each piece of equipment in case immediate questions need to be answered.
- ❖ Require that all workers, including maintenance workers, contractors and visitors, observe hygiene requirements including hand washing, clothing requirements and not to bring any ingredient or food containing gluten onto your premises.
- ❖ Develop written procedures for people to report unsafe events or practices. When corrective procedures are instituted, inform all workers involved verbally and in writing.
- ❖ Develop a procedure for dealing with reports from customers or other parties of suspected gluten contamination. Include and maintain records of an investigation and corrective actions, if any.



- ❖ Immediately report to Charlie's Oasis any ingredient that is said to be gluten-free – but is not.

When first implementing the Program: Either personally or through a trusted person not related to or working with the purchasing agent, inspect receiving and storage areas at least once a week for the first month to avoid cross contact at the start of the program. Repeat when a new purchasing agent is hired. Make a record of each inspection. As you are likely well aware, there is no way gluten can be removed from an ingredient or supply.

FOR OWNERS OF RESTAURANTS THAT SERVE 100% GLUTEN-FREE FOODS

Menu planning: When updating your menu:

- ❖ Keep in mind that cooking from whole unprocessed food minimizes risk.
- ❖ When considering alternatives to wheat, there is currently no single flour that can replace wheat flour.
- ❖ Compile ingredient labels for all your gluten-free recipes. Keep them handy in case a customer asks a server.

Purchases: Give a copy of the [Purchasing Guide](#) to each person in charge of purchasing/ordering and ask that the procedures described in the guide be followed completely.

Procedures:

- ❖ Check all supplies on premises to be sure they are gluten-free in accordance with the Purchasing Guide.
 - Destroy or give away all items that are not gluten-free. Be sure bags etc. are closed tightly and containers sealed when removing to avoid the possibility of cross-contact.
 - Check remaining supplies to assure there has been no cross-contact which could have led to cross-contamination.
- ❖ Inform all employees and guests that no food or ingredient that is not gluten-free will be allowed on the premises – including personal food.
- ❖ Require that all workers, including maintenance workers, contractors and visitors, observe hygiene requirements including hand washing and clothing requirements.
- ❖ Develop written procedures for people to report unsafe events or practices. When corrective procedures are instituted, inform all workers involved verbally and in writing.
- ❖ Develop a procedure for dealing with reports of suspected from gluten contamination from customers or other parties. Include and maintain records of an investigation and corrective actions, if any.
- ❖ Immediately report to Charlie's Table Oasis any ingredient that is said to be gluten-free – but is not.

When first implementing the Charlie's Table Oasis Program: Either personally or through a trusted person not related to or working with the purchasing agent, verify procedures to assure they comply



with the Program. Repeat when a new purchasing agent is hired. As you are likely well aware, there is no way gluten can be removed from an ingredient or supply.

CHAINS

For purposes of the Charlie's Table Oasis Gluten-Free Food Safety Program:

- Restaurants that are part of a chain are to be treated individually and are to follow the above guidelines applicable to the individual location.
- The person responsible for the location should read, and adhere, to the [Owners Guide](#).