United Learning – Food Safety Policy

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1. Policy Statement

1.1 All food provided to pupils and staff across United Learning will be supplied, stored, prepared and cooked to an appropriate standard with food safety managed by competent persons with appropriate skills and training.

1.2 This policy should be read in conjunction with the Allergy and Anaphylaxis Management Code of Practice, Group Health and Safety Policy, Supporting Pupils with Medical needs policy and First Aid Code of Practice.

1.3 This policy sets out how United Learning schools will identify, support, and safeguard pupils with allergies (including food allergies), prevent allergen exposure in school settings (education, catering, trips, clubs), and manages emergencies such as anaphylaxis.

1.4 This policy sets out the school's duties under section 100 of the **Children and Families Act 2014** and DfE statutory guidance on **Supporting Pupils at School with Medical Conditions** and aligns with the **Food Information Regulations 2014** covering allergen information for all food supplied, including PPDS (prepacked for direct sale). This is to ensure that food will be safe for human consumption, suitable, of nutritious quality, appetising and appropriately presented.

1.5 In line with United Learning standards on equality and diversity, this policy aims to meet the needs of those persons with specific dietary requirements or presentation due to, a medical condition, preference, belief, religious or other need. Allergen information will be available and provided to prevent any adverse reactions or adverse events.

1.6 Where food is prepared on premises, it must be ensured that the kitchen and the equipment used in the handling and preparation of food are maintained to the required standards for hygiene and safety.

1.7 Where required each school will be registered with local council environmental health teams.

1.8 All schools must ensure adherence to the required Hazard Analysis and Critical Control Point (HACCP) procedure within its kitchens and ensure appropriate food management systems are in place.

2. Scope

2.1 This policy applies to:

- All food and drink provided by the school, including school meals, breakfast clubs, and snacks.
- Food prepared for or served at school events, clubs, Food Tech and extracurricular activities.

2.2 Advice will be provided for food brought from home and consumed on-site, particularly for special occasions or shared events or via United Communities.

3. Policy Principles

3.1 Inclusive access: Pupils with allergies must be able to participate fully in school life, including accessing a safe school meal.

3.2 Risk based management: There will be priority on education, communication, and safe systems rather than blanket "allergen bans," which are generally not advised due to limited effectiveness. Any restrictions will be risk-assessed and proportionate.

3.3 Whole school approach: There will be awareness, training, and clear procedures for all staff and relevant volunteers.

4. Responsibilities

4.1 Chief Executive

- The Chief Executive Officer (CEO) is responsible to the Board for ensuring that all pupils, staff and visitors who are provided with, or purchase food from our schools receive a safe food service meeting current regulations and guidance.
- The CEO delegates this responsibility to the Chief Financial Officer who will ensure strategic oversight of food safety as part of their Health and Safety remit.

4.2 The Chief Financial Officer

- They will ensure that the required systems are in place to ensure food safety in all our schools.

4.3 The Group Catering Lead

Working under the Head of Procurement will ensure appropriate:

- Due diligence of group catering contractors supplying food to United Learning sites.
- Group catering contractor management to ensure ongoing quality assurance.
- Advice and guidance is provided to schools.
- Adverse event reporting and appropriate investigation is undertaken.

4.4 The Head of Health and Safety

They will lead on any relevant investigation of any reported adverse events to ensure that lessons are learned, and appropriate controls are in place to prevent a recurrence.

4.5 Headteacher / Senior Leadership Team (SLT):

- Ensure school compliance with relevant legislation and local authority requirements and Food Safety Policy.
- Liaise with Environmental Health Officers during inspections and audits.

- Provide food safety training opportunities to staff as required.

4.6 **School Catering Manager / Contracted Food Service Staff:**

- Catering Manager / Provider will comply with Food Information Regulations, maintains allergen matrices/menus, ensures PPDS labelling accuracy, and prevents cross contamination.
- Ensure there is an appropriate food safety management system in place.
- Follow all hygiene procedures including personal hygiene, temperature checks, and allergen controls.
- Ensure kitchen staff hold Level 2 Food Safety in Catering (or higher) qualifications.

4.7 **SENCO/ Medical Conditions Lead**

- Will coordinate Individual Health and Care Plans (IHPs) and pupil registers.

4.8 **All staff (teachers, TAs, lunchtime supervisors, coaches, club leaders)**

- Will complete allergy awareness training annually.
- Will follow IHPs; know emergency procedures.
- Administer an adrenaline auto-injector (AAI) in an emergency where trained and willing to do so or summon immediate help.

4.9 **Parents and pupils**

- Provide all relevant information to ensure the safety and wellbeing of their children.
- Adhere to allergy awareness guidelines applicable to each school.
- Ensure packed lunches are appropriately stored and safe to consume.

5. Interpretation

5.1 The following definitions apply to this Policy:

- '**HACCP (hazard analysis critical control point)**' is a food safety management system that is based upon putting in place procedures to identify and control hazards at specific points of food supply, storage, preparation, cooking and serving and includes:
  - Recognising potential hazards affecting food ranging from supply, storage, cooking and serving.
  - Identifying 'critical control points' to prevent or reduce the hazards.
  - Implementing control measures for these critical points.
  - Taking suitable action if control measures are not achieved.
  - Maintaining procedures and records.

- **Critical Control Points** - areas in food supply, storage, preparation, cooking and serving to focus upon reducing food hazard and risks to an acceptable level.

- **Food Hazards** – food that is or becomes unsafe to eat which can be due to contamination, which is microbiological, chemical or physical.
- **Food handlers** – anyone who may deliver, handle, store, prepare, cook or service food or beverages as their main job.
- **Secondary food handlers** - anyone who may deliver, handle, store, prepare, cook or service food or beverages as an associated part of their job role.
- **Food allergy** - this is a reaction triggered by the immune system, where the body identifies a food as harmful and launches an immune response, potentially leading to severe symptoms.
- **Food intolerance** - this is a difficulty digesting certain foods, causing digestive issues but not involving the immune system. It's not usually serious, but eating the food you are intolerant to, can make you feel unwell.

6. Arrangements

6.1 Identification and registration

- Parents to declare allergies; school requests medical evidence and permission to liaise with health professionals. (Aligns with DfE medical conditions guidance expectations).
- Schools to have an Allergy Register: **a** secure, up to date list of pupils with allergies (photo, class, allergens, severity, treatment, AAI status); available to relevant staff and catering team.
- Schools to ensure classroom and catering visibility through **discreet** identifiers (photo wall for staff rooms/kitchens) consistent with GDPR, and seating/serving notes for identified pupils.

6.2 Food handling Procedures

- All catering managers should ensure appropriate food safety management and HACCP is in place in school kitchens.
- All those who prepare food are required to:
  - Follow handwashing procedures using soap and warm water for at least 20 seconds.
  - Ensure surface cleaning agents are appropriate for food safety and hygiene.
  - Ensure raw and cooked foods are stored and prepared separately to avoid cross-contamination.
  - Ensure fridge and freezer temperatures are be checked and logged daily.
  - Ensure appropriate cooking, hot holding and cold holding parameters are achieved.

6.3 Allergen Management

To prevent allergic reactions staff within the school must be trained in allergen awareness -https://allergytraining.food.gov.uk/. Staff should also be trained in emergency procedures, including the administration of adrenaline auto-injectors (e.g. EpiPen).

Allergen management covers:

- Adrenaline autoinjectors will be immediately available in case of an emergency.
- Ability of staff to recognise symptoms of an allergic reaction.
- Emergency response procedure including calling 999 and saying anaphylaxis.
- Every pupil with a diagnosed allergy must have an Individual Health Plan written with parents, school, and health professionals which includes:
  1. Triggers
  2. Medication
  3. Emergency steps
  4. Photo of the child
- There will be appropriate supply chain due diligence.
- Emergency use under Regulation 238 of the Human Medicines Regulations 2012.
- Allergen information must be clearly available for every item served, as per the Food Information Regulations 2014.
- Schools to maintains a register of pupils with allergies and dietary needs.

Food Allergens include:

- Eggs
- Fish
- Milk
- Crustaceans - for example crabs, lobster, crayfish, shrimp, and prawns
- Molluscs - for example muscles, oysters, and squid
- Peanuts
- Tree nuts - for example almonds, hazelnuts, walnuts, Brazil nuts, cashews, pecans pistachios and macadamia nuts
- Sesame
- Cereals containing gluten – for example wheat, such as spelt, Khorasan wheat/ Kamut, rye, barley, oats, or their hybrid strains
- Soybeans
- Celery and celeriac
- Mustard
- Lupin
- Sulphur dioxide and sulphites (at concentrations of more than ten parts per million)

It should be noted that some people are food intolerant also. It is important that staff follow Health Plans in place for children with food allergies and food intolerances.

The standards for school food in England allow schools and colleges to substitute items from their usual menus if certain items are in short supply. If schools are making changes to their menus or substituting food products due to supply changes or for religious and cultural reasons, they must make sure they can continue to meet any special dietary needs. This includes pupils who cannot eat certain ingredients due to an allergy or other medical condition.

If there are adaptions to menus at short notice, Catering Managers must make sure that the needs of pupils are still met. All menu changes must *still* meet special dietary needs. Suppliers and caterers must check ingredient changes, read all labels, and ensure allergen information is correct.

A complete **allergen menu chart** (dishes and allergen content) must be maintained. Allergen ingredients must always remain clearly identifiable.

6.4 Classrooms, trips and breakfast clubs

Food in these circumstances need to follow these rules:

- **Classrooms -** avoid unnecessary food handling where alternatives exist; clean desks before/after food activities: wipeable name mats for identified pupils if needed. (Risk-based best practice).
- **Trips/Off-site activities -** trip leader completes an allergy risk assessment; ensures IHPs, medications (including spares), and trained staff are present; checks with venues/caterers about allergens. (DfE medical conditions expectations)
- **Breakfast/After-School clubs and sports -** club leaders follow the same policy and controls, catering at clubs adheres to allergen procedures and there should be access to the Allergy Register and IHPs.

6.5 Food Hygiene ratings

Where applicable food should be sourced from establishments with food hygiene ratings of at least a 4 preferably a 5 star. Where they fall below this level advice should be sought from the Group Catering Lead.

6.6 Cleaning and Sanitation

To ensure food safety and hygiene:

- Cleaning schedules must be followed and documented daily for all food preparation and eating areas.
- All food contact surfaces, and equipment must be sanitised before and after use.
- Waste must be disposed of in appropriate, covered containers and removed daily.
- Food waste should be separated from other wastes streams.
- Bins should be able to be fully closed, and pest control inspections should occur regularly. Records should be maintained onsite for all pest control visits by contractors and bait locations.

6.7 Incident Management

In the event of a food safety incident:

- Any suspected outbreak of food poisoning or contamination must be reported to the Headteacher.
- Where 1 confirmed case or more than 1 alleged case is identified and the cases are linked by a common theme of food or location the Headteacher must inform the Local Authority Environmental Health.
- Affected food must be withdrawn, and a full incident investigation carried out.
- Parents and relevant stakeholders will be informed in a timely and appropriate manner.
- Any incident where a person was accidentally given food that they were allergic to, whether they needed an adrenaline auto injector or not, must be reported on the United Learning Accident Management Reporting System - and to the Group Catering Lead.
- Any suspected incident of food poisoning must be reported on the United Learning Accident Management Reporting System - and to the United Learning Group Catering Lead.

6.8 Food Safety training and monitoring

Training and monitoring expectations are as follows:

- All catering staff / Food Tech staff (food handlers) must complete Level 2 Food Safety and Hygiene training which should be refreshed every 2 years.
- SLT within the schools must ensure regular food safety audits and risk assessments are conducted.
- Following any inspections by the Local Authority Environmental Health department the school will work with the department and comply with recommendations.

6.9 Policy Review

This policy will be reviewed annually or following any major changes in food safety regulations. Updates will be communicated to all staff, and training will be provided where necessary.

7. Summary of Requirements

7.1 It is important to ensure only suitably trained persons handle food, that they have the right information to prevent food borne illnesses and that there is appropriate due diligence and monitoring to ensure that food is safe to eat.

8. References

- Food Safety Act 1990 - https://www.legislation.gov.uk/ukpga/1990/16/contents
- Food Hygiene Regulations 2013 - https://www.legislation.gov.uk/uksi/2013/2996/contents
- Food Information Act 2014 - https://www.legislation.gov.uk/uksi/2014/1855/contents
- FSA Safer Food, Better Business (SFBB) - https://www.food.gov.uk/business-guidance/safer-food-better-business-sfbb
- Department for Education's School Food Standards (England) - https://www.gov.uk/government/publications/standards-for-school-food-in-england
- UK Food Information Amendment - https://www.legislation.gov.uk/uksi/2022/481/contents/made
- Section 100 of the Children's and Families Act 2014 - https://www.legislation.gov.uk/ukpga/2014/6/section/100Human Medicines (Amendment) Regulations 2017 - https://www.legislation.gov.uk/uksi/2017/715/contents/madeFSA Guidance for institutional caterers - https://www.food.gov.uk/business-guidance/allergen-guidance-for-institutional-caterers
- https://www.nhs.uk/conditions/anaphylaxis/
- https://www.anaphylaxis.org.uk/about-anaphylaxis/what-to-do-in-an-emergency/
- https://www.gov.uk/government/publications/using-emergency-adrenaline-auto-injectors-in-schools
- https://www.gov.uk/government/publications/school-food-standards-resources-for-schools/allergy-guidance-for-schools
- https://www.resus.org.uk/professional-library/2025-resuscitation-guidelines/first-aid-guidelines#medical-emergencies
- https://www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions--3
- MHRA clarification on emergency use of AAI's - AAI_HMR238_Clarification_Dr_P_Turner.pdf