Food and Allergen Policy
Harvington C of E First and Nursery School

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Governors Responsibility: EY Committee

Introduction

The school provides an environment that promotes healthy eating and enabling pupils to make informed choices about the food they eat. This will be achieved by the whole school approach to food and nutrition documented in this whole school food policy. This policy will ensure that children with food allergies are wholly supported, and that school is aware of their individual needs as well as aware of what allergens are in the food used in cookery and activities. This policy should be read alongside the Health and Safety policy, First Aid policy and all EYFS policies.

The policy was formulated through consultation between members of staff, governors, parents and pupils. The main aims of our school food and allergen policy are:

1. To keep all children safe.
2. To enable pupils to make healthy food choices through the provision of information and development of appropriate skills and attitudes.
3. To provide healthy food choices throughout the day

This policy sets out the background information, aims, issues, and sources of information, guidance and resources relating to the following areas:

- Lunches
- Packed lunches brought in from home
- Early Birds Breakfast Club
- Wrappers After School Club
- Dining environment
- Snacks and drinks
- Water
- Food allergens
- Curriculum

The government food standards for schools were updated in August 2021

Natasha's Law (October 2021) and the impact for schools is shared below.

The new statutory framework for the early years foundation stage sets the standards for learning, development and care for children from birth to five (9.21) This states children must:

- learn how to look after their bodies, including healthy eating, and manage personal needs independently.
- understand the importance of healthy food choices

Natasha's Law:
From 1 October 2021 the requirements for labelling prepacked for direct sale (PPDS) food will change across the UK.

Schools will be **required to list all ingredients and allergens on the labels** of any food made on site – such as snacks, sandwiches, wraps, salad pots, cakes, etc. – **that are pre-packaged prior to break or lunchtime**. This will apply to any foods that are in the packaging before it is ordered or selected. Schools will be required to list all ingredients and allergens on the labels of any food **made on site** – such as snacks, sandwiches, wraps, salad pots, cakes, etc. – **that are pre-packaged prior to use.** This will apply to any foods that are in the packaging before it is ordered or selected. It can include food that children select themselves, as well as pre-wrapped food items that are kept behind a counter and some hot foods.

Guidance from www.food.gov.uk:

This applies to any food business that produces PPDS food, primary and secondary schools, colleges, universities, and nurseries that provide food.

PPDS food is food that is packaged at the same place it is offered or sold to consumers. It is a single item, consisting of the food and its packaging, that is ready for presentation to the consumer before it is ordered or selected.

For food provided within a school setting, this may mean changes to labelling for foods such as pizza or sandwiches which are packaged on the premises before the consumer orders them. The changes mean that food made and packaged before the consumer orders or selects them and sold on the same premises (or site where a business operates from more than one location) it is packaged at, will require labelling.

Examples of PPDS food that may be provided by schools include:

- fruit pots
- breakfast pots
- boxes of chips or chicken nuggets placed under a hot lamp in anticipation of a lunchtime rush
- packaged sandwiches or salad boxes
- packaged burgers.

Examples of food that is not prepacked for direct sale

PPDS does not include food that is not in packaging. Food placed into packaging or plated at the consumer's request is not PPDS.
This food is not PPDS and can include products such as:

- unpackaged cakes, and unpackaged food behind a glass display counter or in a hot hold cupboard
- meals made or plated to order.

Non-prepacked (loose) food does not require a label and must meet current allergen information requirements for non-prepacked food.

Prepacked food

School may also sell pre-packaged food that was packed by another food business at a different site to where it is offered to consumers, or food that has been packaged by another business.
This is not 'prepacked for direct sale' food but is 'prepacked' food. Prepacked food requires a label with a name, ingredients list, allergens and other mandatory details.
This link has further information on labelling prepacked food and the requirements food labels must meet.

Labelling guidance for schools, colleges and nurseries

Labels on PPDS food need to show the name of the food and the ingredients list.
This includes emphasising in the ingredients list any of the 14 allergens used in the product, as required by food law. Emphasis can be added by using bold type, capital letters, contrasting colours or underlined text. This must be clear enough for the consumer to read.
Our labelling guide for prepacked for direct sale food has detailed information on labelling requirements, including the name of the food, type size and precautionary allergen labelling such as 'may contain'.

School packed lunches (included as we provide breakfast and tea. Our food company are responsible for lunch service.)

PPDS allergen labelling changes only affect food that is packed and sold or offered at your site.
If packed lunches are made on school premises in anticipation of an event, such as a school trip, the allergen information requirements may vary. If the lunches are made and packed to order, these are not prepacked, and are therefore not PPDS.
If, however, the school lunches are made and packed without specific orders from individual children, then these would need to comply with the new PPDS labelling requirements.
If there are multiple items in a packed lunch you will need to provide allergen information for each item. You will need to label each PPDS item individually.
Any prepacked items you have bought from elsewhere (that is food packed at a different location by another business) will already have full ingredients labelling.

Example PPDS food label

Our labelling guide for PPDS food has detailed information on what to include on a food label, and how to present and produce it.
One example of how the label could look can be found below, but you could choose to present it differently if you meet the legal requirements. You must include the name of the food, a full ingredients list and emphasise any of the 14 allergens present in the food.

Definition of 'packaging'

Food is PPDS if it is packaged as follows:

- the food is fully or partly enclosed by the packaging
- the food cannot be altered without opening or changing the packaging
- the food is ready for sale to the final consumer.

Examples of this kind of packaging would be:

- a cake completely enclosed in cling film
- bread placed in a paper bag with the bag folded over or twisted to encase the bread
- rolls contained in a plastic bag that is tied with a knot or sealed.

Food is not PPDS if it does not have packaging, or if it is packaged in a way that the food can be altered without opening or changing the packaging (for example a cake served on an open cardboard tray).

Frequently asked questions from schools about PPDS labelling

Where can I find the specific requirements for what to include on a PPDS food label?
Our labelling guide for prepacked for direct sale food has detailed information on labelling requirements, including naming conventions, type size and precautionary allergen labelling such as 'may contain'.

Do the PPDS changes affect school meals that are plated to order?
No. If you are plating food (not prepacked before the point that it is ordered) there is no need to list ingredients. You must be able to provide information, in writing or orally, on the presence of any allergens in the food you are serving.

Do the PPDS changes affect packed lunches?
PPDS allergen labelling changes only affect food that is packed and sold or offered at your site.
If the lunches are packed to order, these are not prepacked, and are therefore not PPDS.
If, however, the school lunches are packed without specific orders from individual children, then these would need to comply with the new PPDS labelling requirements.

Do the PPDS changes affect school meals ordered by parents on a menu cycle?
This would not be considered PPDS if the food has been ordered before being packaged for the individual. You should continue to make allergen information available to parents and students as you do now.
However, if parents are paying for food in advance and have not made specific orders, the food could be considered PPDS depending on if and how it is packaged before being chosen by a student.

Do the PPDS changes affect prepacked tuck that is provided to younger years pupils by the school?
It is understandable that pupils at the younger end of school may not be able to make informed decisions about the food provided to them and that schools will currently have a safeguarding responsibility in respect of this.
However, the changes to PPDS labelling mean that any food that is packed on the same site before being ordered by the consumer will need to provide PPDS labelling.
Schools may currently manage this through school health records or catering staff who are aware of pupils' allergen requirements.

Do I need to label food wrapped in cling film?
If the food is completely or partially enclosed by cling film or other packaging before it is ordered (and is ready for presentation to the consumer), and the food cannot be altered without opening or changing the packaging, it is PPDS food.
If an item is removed from cling film before it is presented to the consumer, then this is not PPDS food. This is non-prepacked food and so allergen information must be provided in some form.

Do I need to label food items if they are sold loose?
Loose food which is not sold in packaging does not require a label. It must meet current allergen information requirements for non-prepacked food.

Do I need to label food if I prepare and wrap food and keep it under a hot lamp before it is ordered?
If you prepack food in anticipation of consumer orders, these products will require PPDS labelling.

Do I need to provide labels for a salad bar or self-service buffet?
If the salad is packaged before being ordered, it would require a PPDS food label. However, if the salad bar is self-service, and the student plates it onto a plate or into a box themselves this is non-prepacked food.
Allergen information for non-prepacked food can be communicated through a variety of means to suit your business model. You are required to provide information about the use of the 14 allergens if they are present in a food. You are not required to provide a full ingredients list.

If I display allergen information on a menu or on our website to inform parents, do I still need to label PPDS food?
Yes, using an allergen information sheet is not a substitute for PPDS food labelling.
PPDS food will still require a full ingredients list and allergen information on the label.

Do hot drinks, such as tea or coffee, require PPDS labelling?
Hot drinks made to order are not PPDS and do not require PPDS labelling.
But if you pour and lid drinks before consumers order them, in anticipation of a rush, the drinks would be PPDS and would need labelling.

School Arrangements:

Lunches

- To maintain and/or increase levels of uptake of hot lunches
- To ensure that the food provided is compliant with the standards for school lunch, is of a high quality and promotes health
- To ensure that the choices provided address cultural, religious and special dietary needs
- To ensure the school has the capacity to provide a meal for all those who require one.
- For some pupils, especially those from disadvantaged backgrounds, the school lunch may be the only substantial meal they eat during the whole day. It is therefore important that the school lunch provides a tasty and nutritious meal for all pupils.
- Sodexo offer a nutritious, balanced hot lunch option to all children
- Teachers, caterers and school nurses have a key role in influencing pupils' knowledge, skills and attitudes about food, so it is important that they are familiar with healthy eating guidelines.
- School Meals are provided by Sodexo Ltd who provide all the training needs for their staff, including their Allergen Policy. Staff are informed about changes to healthy eating guidelines and appropriate training organised

Packed lunches brought from home

- The school encourages parents and carers to provide children with packed lunches that complement these standards. This is achieved by promoting healthy packed lunch options through the curriculum, newsletters, themed weeks and assemblies.
- School information define lunchbox guidance for parents
- Guidance on packing a healthy lunchbox is provided to all parents/ carers
- Lunchbox contents are monitored by staff. Discussions with parents to improve where necessary.
- Healthy food topics are frequently covered within daily activities/ displays.
- Sweets and chocolate (without a biscuit) are not encouraged.
- We are a nut free school so we ask parents/carers to not include products containing nuts in packed lunches.

Early Birds Breakfast Club

To provide a healthy, balanced breakfast for children. The breakfast menu includes: cereal, fruit, toast, yoghurts and a drink of water, semi skimmed milk or fruit juice.

- To provide practical nutrition education.
- To provide examples of healthier breakfasts to parents.
- To ensure that the provision is in line with legislation and the whole school food policy.
- Children who don't have breakfast may have low blood sugar and be dehydrated, which can affect their ability to concentrate. It is known that significant numbers of children do not eat breakfast before leaving home.
- Breakfast club provision falls within the Extended Schools agenda and the Government's target that schools should aim to offer 'wrap around' care between 8am and 6pm.
- As well as providing a forum for healthier breakfasts, such clubs can address the needs of children who arrive at school very early and who don't otherwise have a breakfast. They can be used to promote better attendance.
- Breakfast clubs provide a range of activities such as reading, sports and exercise.
- From October all food provided will comply with food standards, including those stated in 'Natasha's Law (see detail above)
- Rolling menu to ensure foods are offered according to frequency regulations.
- Only planned food, where labels have been checked, will be provided. If items are substituted on delivery, then these items will need to be checked by the lead adult.
- Children will have the opportunity to choose their breakfast items with an adult supervising.

Wrappers After School Club

- To ensure that food and drink provision is in line with food standards regulations and the whole school food policy.
- To provide activities that promote the healthy eating agenda such as cookery clubs and growing clubs.
- Wrappers after school club provision falls within the Extended Schools agenda and the Government's target that schools should aim to offer 'wrap around care' between 8am and 6pm.
- School provides food and drink, and this gives opportunities to promote healthy eating and to provide nutrition education and related activities.
- Food and drink provided for after school provision must meet the school food standards.
- Rolling menu to ensure foods are offered according to frequency regulations
- Only planned food, where labels have been checked, will be provided. If items are substituted on delivery, then these items will need to be checked by the lead adult.
- Healthy activities promoted in after school club

Dining environment

- To ensure the dining environment is a safe and desirable place where there is enough space to sit and eat a meal, promoting social opportunities
- To provide guidance on how to use cutlery, eat properly and talk to others.
- To promote healthy eating choices.
- Dining is a social and cultural experience. If you have a pleasant and happy dining environment, people will want to eat there. It is important to give young people ample opportunity to sit and enjoy their meal together, allowing them to feel rested and refreshed for learning in the afternoon.
- Nursery pupils join school pupils in the hall at lunchtime (with designated tables and supported by EY staff)
- For new/ less confident Nursery pupils there is an option to remain in nursery
- Outdoor play/ rest area provided once lunch is finished
- Tables are thoroughly cleaned with antibacterial disinfectant.
- Conversations are encouraged and the children are always relaxed and happy at mealtimes.
- Lunches are kept in cloakrooms or in the Nursery kitchen for Nursery children

- Children with packed lunch bring plate and cup (reduce 'clutter' on table)
- Children take packed lunch waste home so that parents can monitor what has been eaten)

Snacks and drinks

- The school understands that snacks can be an important part of the diet of young people and can contribute positively towards a balanced diet.
- The school discourages the consumption of snacks high in fat and sugar at break-time.
- Children are encouraged to bring in a healthy snack (fresh fruit or vegetables) to eat at morning break.
- Fruit is provided in school for children in Reception, KS1 and KS2
- To ensure that any snacks and drinks provided by the school meet the school food standards.
- To encourage pupils to drink water at frequent intervals throughout the day.
- To educate pupils about the importance of hydration.
- To ensure that all pupils have easy access to free, fresh drinking water throughout the school day.
- Fresh water, in jugs, is provided at breakfast, lunch and tea.
- All food provided by the school must meet the national food standards.
- Fresh fruit is provided free of charge daily
- Fresh milk is provided free to under 5's and at parents request
- No fruit juices are available when fruit is provided (sugar regulations)
- Guidance is followed, and risk assessments completed, when foods are provided for special occasions such as cultural events or as part of curriculum learning.

Food allergies

- From December 2014 new advice regarding food allergens was made available, see www.outofschoolalliance.co.uk
- True food allergies are reproducible adverse reactions to a particular food that involve the immune system. Virtually all known food allergens are proteins. They can be present in the food in large amounts and often survive food-processing conditions. Allergic reactions are characterised by the rapid release of chemicals in the body that cause symptoms, which can occur within minutes or up to an hour or more after ingestion of the allergen. Whilst almost any food protein can cause an allergic reaction in some people, the most common food allergens in Europe include cereals containing gluten (like wheat, rye, barley), seafood (including crabs, prawns, lobsters, muscles and cockles), eggs, fish, peanuts, milk, tree nuts (almonds, hazelnuts, walnuts, Brazil nuts, cashew nuts, pecan nuts, pistachio nuts, macadamia nuts and Queensland nuts), soya, sesame, celery, mustard and SO2. The proportion of the population with true food allergy is approximately 1-2% of adults and about 5- 8% of children, which equates to about 1.5 million people in the UK. Coeliac disease is not an allergy. Whilst it is classified as a food intolerance it is not like other intolerances in that it is an 'auto-immune' disease, which means that the body produces antibodies that attack its own tissues. In coeliac disease this attack is triggered by gluten, a protein found in wheat, rye and barley. This intolerance to gluten causes an inflammatory response that damages the gut. Villi (tiny, finger-like projections that line the gut) become inflamed and then flattened (villous atrophy), leading to a decreased surface area for absorption of nutrients from food. People with undiagnosed coeliac disease can, as a result, have a wide range of digestive symptoms and can suffer from nutritional deficiencies.

- Parents/Carers are regularly reminded to provide the school with sufficient and up to date information about their son/daughter's food allergies. They must carry out any action they have agreed to as part of its implementation. For example, provide medicines and equipment and ensure that they, or another nominated adult, are always contactable.
- Parents/Carers are responsible for ensuring that any required medication to be kept on site (eg EpiPens, inhalers, specific antihistamine) is supplied, in date and replaced as necessary.
- Parents complete the medical form as part of the main consent form. This enables school to share medical information within school including food allergies and dietary requirements.
- Office staff, First Aid lead collates this information and shares with the staff including the Wrappers team

- The school consent form includes the special diet form from Sodexo and it is the family's responsibility to complete this.
- Any children who have food allergies are coloured coded on the booking forms so all staff know.
- Lunch leads and Early Birds and Wrappers staff to share with parents a 'safe menu' which is for individual children who may have allergies or dietary requirements e.g. vegan. Lunch leads and Early Birds and Wrappers staff will speak to parents to check the menu. Lunch leads and Early Birds and Wrappers will confirm the menu with the family, in writing
- Lunch leads and Early Birds and Wrappers staff to ensure all children are served the correct food
- Children with special dietary needs or allergies are to be at the front of the line so there is not cross contamination of allergens on servers' gloves and will be served their food on a different coloured plate. When the new bands have arrived children with allergens will be asked to wear one before they enter the food hall, this will be given to them by their class teacher/TA
- Lunch leads and Early Birds and Wrappers staff to liaise with school and share a list of all children they have on their special diets menu.
- Information regarding allergies/ intolerances collected during home visits and on data collection consent forms provided by the office and to be completed by parents before the child starts in our school. This is to be shared with staff before the child starts in school.
- Information regarding allergies/ intolerances for children attending school, including Early Birds and Wrappers is shared with staff prior to children attending
- Health care plans are shared with all staff and are written by the senior first aider – see First Aid Policy.
- Medications are locked away.
- Training for specific responses eg Epi-pen updated as needed in response to health care plans.
- At least one full First Aider is always present.
- Emergency procedures within easy access (telephone/ grid reference for Emergency Services)
- School must consider the needs of food-allergic pupils and has developed appropriate procedures, including writing risk assessments for all food activities
- Children are not unknowingly exposed to food allergens like nuts and seeds.
- This policy is used for all school activities.
- To identify and plan for the needs of food-allergic pupils when teaching Food Technology and other curriculum learning.
- Any food such as cakes for birthdays are required to be shop bought, in date and in original packaging
- Gifts such as sweets between pupils for birthdays are given as children leave school only and are only, only to be consumed with parental consent once in their care.
- Caterers, Wrappers staff and all staff involved in a cookery activity must:
- ▪ always check deliveries to make sure what is delivered is what was ordered and ensure that the relevant labelling information is provided with the order;
- ▪ check that the food delivered is the same brand that is normally used, as different brands might have different ingredients.

Caterers and Wrappers staff

- Please note that Sodexo Catering have a nut-free policy on site.
- The caterers are aware of all individual allergies and specific dietary requirements and provide clear labelling to all food served in the dining rooms at each site.
- Staff serve children with allergies first to avoid cross contamination of allergens on gloves.
- The caterers provide copies of the relevant school's 3 weekly menu cycle. The weekly menu is also placed in the dining room and on the website
- Wrappers staff are aware of all children with allergies and cater for them accordingly.
- Wrappers staff have a menu to ensure a clear knowledge and understanding of food ingredients

Food Storage

- Appropriate food safety precautions are taken when food is prepared or stored. These vary depending on the food on offer and include: ensuring that adequate storage and washing facilities are available; that food handlers undergo appropriate food hygiene training; and that suitable equipment and protective clothing are available.
- Packed lunches in Nursery contain a 'cold pack' to reduce temperature and this is encouraged throughout the school
- Ingredients for cooking activities must always be purchased from respectable shops and stored appropriately.
- It is Sodexo's responsibility to provide the necessary training for their staff.
- All Early Birds and Wrappers staff must undergo Food Hygiene Safety Training.
- Any food safety hazards are identified and controlled. We consult our local Environmental Health Department about legal requirements.
- Whenever there is a cookery activity a risk assessment must be written and children with food allergies checked and catered for.

Curriculum

- To ensure that the whole school food policy encompasses nutrition education in the curriculum.
- Risk assessments must be completed for all food related activities (and HACCP's where appropriate) to ensure that only those foods which have been deemed safe are being served to children and used by children in cooking activities.
- Only 'low risk' foods may be used by those adults without a valid Food Hygiene certificate.
- Healthy lifestyles are promoted through a broad range of activities in developmentally appropriate ways
- Planning reflects current curriculum guidance/ health advice for under 5's and includes designated time for activity and rest
- Outdoor spaces are always available (subject to weather/ H&S guidance). Pupils are encouraged to wear suitable clothing/ protection for weather conditions. Pupils attending after school club are encouraged to bring a change of clothes for activities.
- Vegetable patches are used to promote understanding of the food cycle. Food is often used in cooking activities and other curriculum areas.
- Roots and Shoots is successfully led with Yrs 2-5 children, and they gain an understanding of food and sustainability.
- ECO understanding/ practice are promoted through whole school events and class-based activities
- Food and nutrition are taught at an appropriate level throughout each key stage.
- Termly cookery sessions are planned using the children's kitchen area or classrooms,

Teaching methods

- Effective teaching requires pupils to develop their understanding of healthy eating issues and appropriate skills and attitudes to assist them in making informed decisions. Teaching methods adopted in the classroom offer a rich variety of opportunities for participatory learning and include debating issues, group discussions and role-play. These decisions are made at teachers planning meetings.

Visitors in the classroom

- This school values the contribution made by the school nurse in supporting class teachers and appreciates the valuable contribution of outside agencies. We believe it is the responsibility of the school to ensure that the contributions made by visitors to the classroom reflect our own philosophy and approach to the subject. The status of visitors to the school is always checked ensuring that the content of the visitor's talk is suitable for the ages of the pupils.

Evaluation of pupils learning

- The healthy eating aspects of the National Curriculum are assessed through teacher assessment carried out at the end of each half term and entered on to the school assessment system.
- Other aspects of healthy eating work are evaluated through activities, which have been built into the curriculum, as part of the planning process.

Equal Opportunities

In healthy eating, as in all other areas of the curriculum we recognise the value of the individual and strive to provide equal access of opportunity for all.
The school provides food in accordance with pupils' religious beliefs, individual principles and cultural practices
We ensure all children can access all that is shared in this policy safely and meeting their individual needs.

Essential Information:

https://www.food.gov.uk/business-guidance/prepacked-for-direct-sale-ppds-allergen-labelling-changes-for-schools-colleges-and-nurseries

https://www.gov.uk/government/publications/standards-for-school-food-in-england/school-food-in-england

http://www.schoolfoodplan.com/wp-content/uploads/2014/06/Checklist-for-school-food-other-than-lunch-140616.pdf

http://www.schoolfoodplan.com/standards/