

Medical Diet Policy (Primary, Feeder, Diner and Through Schools)

1. Purpose

This Medical Diet Policy defines our practice in the delivery of safe school meals for pupils with medical dietary requirements in Primary Schools.

2. Scope

This Medical Diet Policy covers all primary school meals prepared and served by us. For the purpose of this policy a medical diet is defined as being a medically prescribed therapeutic diet as a treatment for a medical condition, including pupils with food allergies or food intolerances. It does not include diets required for religious, cultural or personal requirements/preferences and dietary trials or elimination diets.

3. Exclusions

Due to the increasing number and complexity of allergen and intolerance-related medical diet requests and to ensure the delivery of safe school meals for pupils with medical dietary requirements in Primary Schools we can only provide medical diets for children who meet the criteria outlined in this policy.

- 3.1. Food manufacturers and suppliers are only required to provide information on the EU FIC 14 Allergens in their products. Any foods that fall outside of these 14 allergens may not be fully listed in a product's ingredient list (for example as an 'ingredient within an ingredient' that may only be contained in small amounts within the final product, but may still present a risk for those with allergies). For this reason, where a pupil has been prescribed an EpiPen or equivalent adrenaline auto-injector as part of the management of a food allergy that falls outside of the EU FIC 14 Allergens (please see Appendix 2 for full list of EU FIC 14 Allergens) Elior is unable to safely cater for that pupil.
- 3.2. We can cater for no more than a combination of two specified food allergies/intolerances plus one or any of the following: tree nut, peanut or shellfish. We will cater for any number and combination of fruit allergies if in isolation of other requirements.
- 3.3. Requests for medical diets for children with multiple food allergies that fall outside of the above criteria cannot be safely provided for.
- 3.4. We reserve the right to refuse to provide a meal if it is deemed to be too complex or high risk to safely manage at site level. Please see Appendix 1 for our exclusion list of medical diets.
- 3.5. Please see Appendix 5 for a flow diagram outlining Elior's medical diet provision.

4. Medical diet procedure

Prior to any pupil with a medical diet request being served a school meal, the below process applies¹ (Diagram 1 provides an overview of the process):

- 4.1. The parent/carer should contact the school/Local Authority school team to request a medical diet. Details of where to obtain medical diet request forms will be communicated from the school/Local Authority school team as part of the new pupil induction pack prior to starting in September. For those pupils who develop a requirement for a medical diet within a school year, parents should contact the school directly for the appropriate form.
- 4.2. The school/Local Authority team will provide the parent/carer with a medical diet request form to complete and sign

¹ Please note that this is the standard process, there may be local variation of the process at site or local authority level. This will be detailed in the Procedure Document for the specific site/local authority

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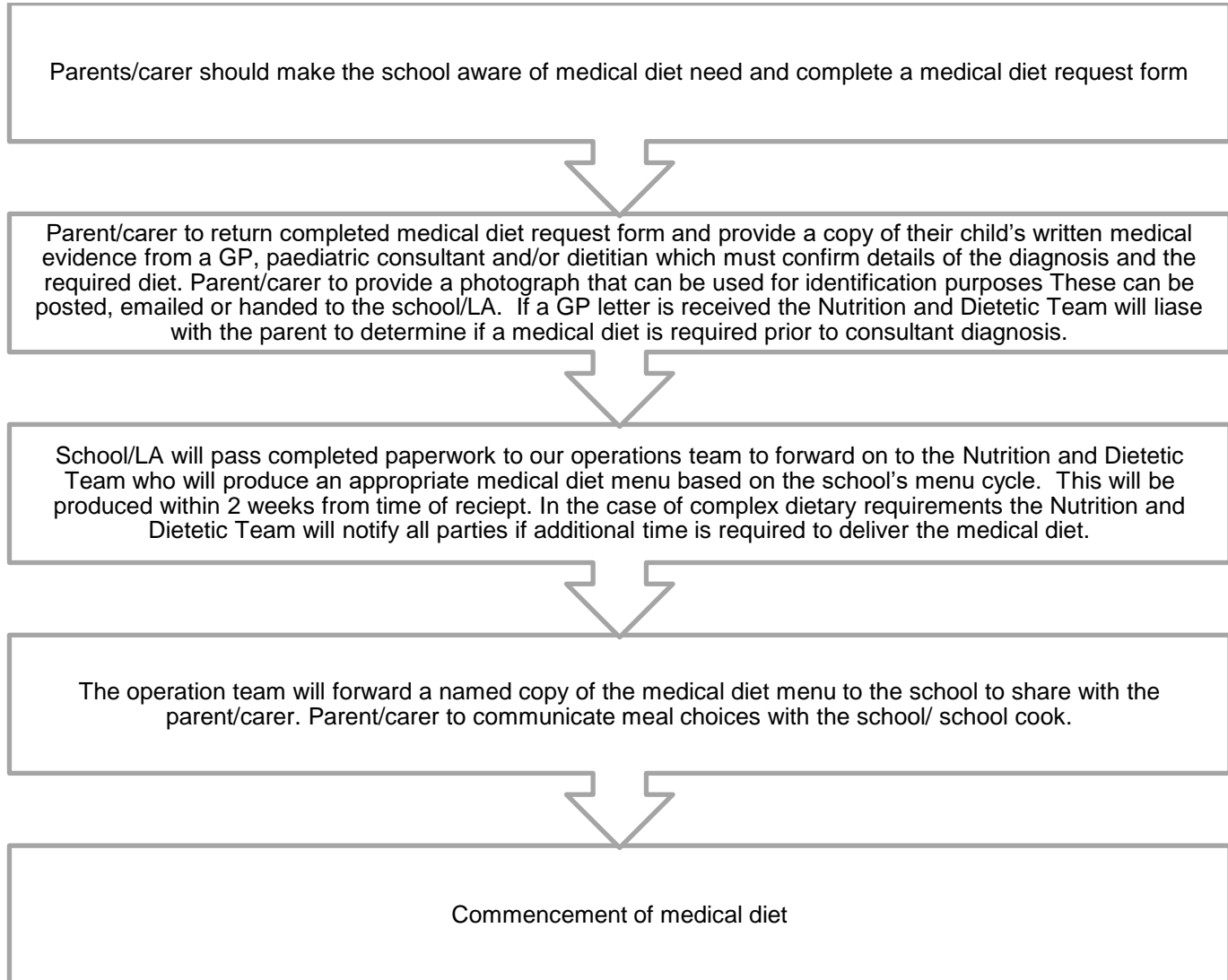
- 4.3. The parent /carer must complete, sign and return the medical diet request form along with an up to date photograph of the child for identification purposes, supporting medical evidence² from the GP³, paediatric consultant or dietitian to the school/Local Authority team. Medical evidence must confirm details of the diagnosis and the required diet.
- 4.4. The school/Local Authority team will collate and ensure all required documentation has been returned. The school/Local Authority will pass the forms onto one of our catering Operations Manager who will ensure it is forwarded to our Nutrition and Dietetics Team for processing. Work on requests for medical diets can only commence on receipt of **all** required documentation.
- 4.5. The Nutrition and Dietetic Team will prepare medical diet templates based on the school's menu cycle. For each pupil requiring a medical diet, a named medical diet menu will be sent to the school and parent/carer. The parent/carer are to communicate their child's meal choices with the school directly.
- 4.6. The Nutrition and Dietetic Team aim to provide a child with a medical diet within 2 weeks of all required documentation being received.
- 4.7. In the situation of non-standard medical diets where diet templates have not been prepared in advance and liaising with all stakeholders (parent/GP/hospital/local authority) is required to deliver a safe solution, the process may take longer than 2 weeks. The Nutrition and Dietetic Team will notify all parties if additional time is required to deliver the medical diet.
- 4.8. There will be a suitable jacket potato option available for children requiring a medical diet whilst their medical diet template is being prepared.
- 4.9. Once meal choices have been communicated with the school / school cook manager the medical diet can commence providing all required ingredients are available.
- 4.10. The medical diet procedure needs to be completed for every pupil with a medical diet requirement within the specified criteria. Please refer to Section 10 'Review Process for Medical Diets' for details of the review process for medical diets.

² Medical evidence - should be dated within 12 months of the medical diet request and be from a GP³, paediatric consultant or dietitian. We will hold the medical dietary evidence and the photographs of the children on their records. This data is held in accordance with our data handling policy and will not be shared with third parties. For more information on how we will handle this data please see our Medical Diet Privacy Notice at Appendix 6 to this Medical Diet Policy.

³ If we receive a GP letter the Nutrition and Dietetic Team will contact the parent/carer to determine if a medical diet is required prior to consultant diagnosis

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Diagram 1. Summary of Medical Diet Procedure



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5. Medical diet menus

- 5.1. Following receipt of a completed medical diet request form, the Nutrition and Dietetic Team will create medical diet templates.
- 5.2. Any proposed menu will be based on the school's menu cycle.
- 5.3. The medical diet menu will be produced by our Education dietitians.
- 5.4. The medical diet menu removes allergens in full, for example see Appendix 2
- 5.5. Medical diet menus will be derived from the following dishes on the menu: the top two lines of main course dishes, the sandwich line, the jacket potato line, the hot dessert line and the yoghurt and fruit dessert line. This applies to schools that are following our standard national menu. See Appendix 3 for further details.
- 5.6. Catering staff in the kitchen can only produce a medical diet once they have received a named medical diet menu

6. Preparation of medical diets

- 6.1. All our education staff are required to complete the allergens e-learning module which is revalidated annually and must follow the processes laid out in 'Section 6: Allergens', in the company Safety and Wellbeing Manual. This includes the responsibilities for different job roles at education sites, including those relating to food allergies and medical requirements.
- 6.2. Education catering staff are required to follow recipes exactly (i.e. using the correct ingredients in the correct quantities and not substituting ingredients) so that each dish prepared matches the specification as documented in the medical diet template.
- 6.3. Education catering staff are required to follow best practice procedures to minimise the risk of cross contamination.
- 6.4. Education catering staff are only permitted to cook and serve the exact recipe detailed in each of the medical diet templates for each named pupil, each day. No deviation from this may occur at any time on request from the school or parents without consultation and agreement with the Nutrition and Dietetic Team.
- 6.5. All education catering staff are trained to follow best practice procedures in our kitchens and take steps to minimise the risks of foods coming into contact with other food products, including allergens. However, due to the presence of ingredients that contain allergens that are routinely used in our kitchens, and that normal operations may involve shared cooking and preparation areas, we can never guarantee that a dish is completely free from any allergens/specific ingredients.
- 6.6. In the event of any product substitution/s, delists, or any other eventuality resulting in the unavailability of ingredients during a menu cycle whereby medical diet templates along with recipe packs have already been prepared and distributed to catering staff, communications from the Nutrition and Dietetic Team will be cascaded to sites that must be followed to ensure that the correct actions are taken for the preparation of medical diets.

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7. Service of medical diets

The school catering team will produce the medical diet menu for each child in accordance with any specific instructions from the Nutrition and Dietetic Team.

- 7.1. Photographs of pupils with medical diets are displayed in the kitchen area on the notice board, to ensure that our catering staff can identify pupils with special medical diet requirements and ensure that the correct menu items are served. Photos will be displayed in accordance with School policy.
- 7.2. Any specific instructions as requested by Nutrition and Dietetic Team will be followed by our catering staff.
- 7.3. Processes for different service styles and medical diets transported to other sites are detailed in Appendix 4.
- 7.4. Once the correct meal has been served to a pupil, it is the lunchtime supervisor's/school's responsibility to ensure the child only eats the appropriate meal that has been prepared for them.

8. Breakfast clubs, after school clubs, school trips and foods served other than lunch

- 8.1. In schools where we are contracted to provide a full food service at meal times other than lunch, and where ingredients are supplied via our own supply chain, we will, where safe, provide medical diet menus for pupils with dietary requirements. The menu will only be produced when it is confirmed that a pupil requiring a medical diet will be attending breakfast and/or after school clubs. Due to the limited range of foods on offer at breakfast, it may not always be possible to provide a meal for pupils with complex dietary requirements.
- 8.2. In schools where ingredients are purchased by the school for our catering staff to prepare (i.e. not using ingredients from our own supply chain), we will be unable to plan and prepare medical diet menus because the composition of the foods, for example allergen and nutritional composition, will not be known to our Nutrition and Dietetic Team in advance.
- 8.3. If we provide a packed lunch for a school trip, the cook will liaise with the Nutrition and Dietetic Team to confirm that a suitable recipe and contents is chosen for each child on a medical diet requiring a packed lunch.
- 8.4. Theme days, street food dishes and items from the salad bar area are **not** suitable for medical diets unless agreed as part of the menu planning process.

9. Prescription foods

- 9.1. This only applies to complex medical conditions where we cannot supply a product or ingredient via our supply chain e.g. a low protein mix for PKU, and not standard special diet items such as gluten free products.
- 9.2. Parents/carers of children with prescriptions for special dietary products may bring these items into school for use in the kitchen, in consultation with the Nutrition and Dietetic Team.
- 9.3. Foods should be labelled clearly with the name of the pupil and the date that it was brought into school.
- 9.4. Special dietary products must only be used for the named child, and not for any other child.

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- 9.5. Storage instructions must be followed by our kitchen staff i.e. temperature control, conditions and shelf life. Special dietary products must be stored so that no cross contamination can occur with other food products, for example, in a clearly labelled sealed container. The original packaging must be retained.

10. Review process for medical diets

- 10.1. Medical diets may be reviewed by the Nutrition and Dietetic Team from time to time in order to ensure that children do not continue to receive a restricted diet unnecessarily.
- 10.2. The review process excludes pupils with dietary requirements that will not, or are unlikely to change over time, for example a gluten free diet for coeliac disease, or carbohydrate counting for type 1 diabetes mellitus. Please note that this is not an exhaustive list and the exclusion criteria for the review process is available upon request from the Nutrition and Dietetic Team.
- 10.3. The Local Authority/School will update us of the pupils that no longer require a medical diet.

11. Reintroduction of Allergens

- 11.1. A child may grow out of their allergy or intolerance. In such instances, where it is no longer necessary for a child to follow a medical diet, a letter from a paediatric consultant, dietitian or GP is required stating that the child is no longer at risk from the allergen and it is safe to be reintroduced, in full, into their diet.
- 11.2. Allergens will only be introduced in full. We will not participate in reintroduction trials or partial reintroduction of allergens.
- 11.3. The allergen will only be reintroduced on receipt of a letter from a paediatric consultant, dietitian or GP and with written consent of the parent/carer.

12. Monitoring and Governance process

- 12.1. The Procedure Documents are reviewed annually by the Nutrition and Dietetic Team and updated accordingly and signed off at Board level
- 12.2. Legal and Safety and Wellbeing Teams will notify the Nutrition and Dietetic Team of any new legislation that will require immediate changes to policy and/or procedures.
- 12.3. In certain circumstances we may be unable to provide a meal if we deem it to be too complex or high risk to safely manage at site level and we reserve the right to refuse to provide a meal in those circumstances. Our standard exclusion criteria are described in section 3 of this policy, but we reserve the right to exclude other requests that are not included in these criteria. Such cases will be referred back to the parent/carer and the school/Local Authority will be notified.
- 12.4. Records of medical diets are kept, and data can be provided on a school-by-school basis on request.



Catherine Roe
Chief Executive, Elior UK
2 December 2019

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Appendix 1 - Exclusion list for medical diets

The following diets cannot be safely catered for in a school environment

- Onion
- Garlic
- Tomato (with the exception of raw tomato)
- Potato
- Fructose
- E-numbers and additives (with the exception of artificial colours, please note that we do not knowingly use ingredients containing undesirable additives)
- Herbs
- Spices
- 'Seeds' - unless the type of seed is specified
- Salicylates
- Low FODMAP
- Citric Acid
- Benzoates and cinnamon
- Legumes- unless the variety is specified
- Yeast
- Derivatives of corn i.e. dextrose, maltodextrin
- Derivatives of Bean i.e. guar gum

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Appendix 2 - Medical Diet Menu Approach for Food Allergies

Medical diet menus for children with food allergies encompass all variations of specific food allergies. Sensitivity/tolerance to certain food allergens can vary from individual-to-individual, for example some children with egg allergy may safely eat cooked egg. However, to safely cater for all pupils with allergies food allergens and products/derivatives thereof are excluded as detailed below:

- Gluten free. Medical diet menus exclude all cereals containing gluten, namely: wheat, rye, barley, oats and their hybridized strains, and products thereof. Derivatives of gluten containing cereals are also excluded from gluten free diets.
- Crustacean free. All crustaceans and products thereof are excluded.
- Egg free. All eggs and products thereof, both cooked and raw are excluded.
- Fish free. All fish and products thereof are excluded.
- Peanuts. All peanut and products thereof. We do not knowingly purchase any food products that contain peanuts or tree nuts.
- Soya free. All soybeans and products thereof are excluded.
- Milk free. Milk and products thereof (including lactose), in both cooked and uncooked forms are excluded
- Nut free. Tree nuts i.e. almonds, hazelnuts, walnuts, cashews, pecan nuts, Brazil nuts, pistachio nuts, macadamia (Queensland nuts) and products thereof are excluded. We do not knowingly purchase any food products that contain peanuts or tree nuts.
- Celery free. Celery and products thereof, including celeriac and celery seeds are excluded.
- Mustard free. Mustard and products thereof are excluded.
- Sesame free. Sesame seeds and products thereof are excluded.
- Sulphite free. Sulphur dioxide and sulphites are excluded.
- Lupin free. Lupin and products thereof are excluded.
- Molluscs free. All molluscs and products thereof are excluded.

This is not an exhaustive list, but covers examples for the 14 EU FIC allergens.



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Appendix 3 - Menu Template

Medical diet menu will be derived from the following dishes on the menu: the top 2 lines of main course dishes, the sandwich line, the jacket potato line, the hot dessert line and the fruit and yoghurt dessert line (highlighted in purple).

	Monday	Tuesday	Wednesday	Thursday	Friday
Hot choice 1					
Hot Choice 2 (Vegetarian)					
Hot Choice 3					
Jacket Potato					
Sandwich					
Vegetables and salad					
Hot dessert (with 50%) fruit 2 x week)					
Dessert Fruit and Yoghurt					



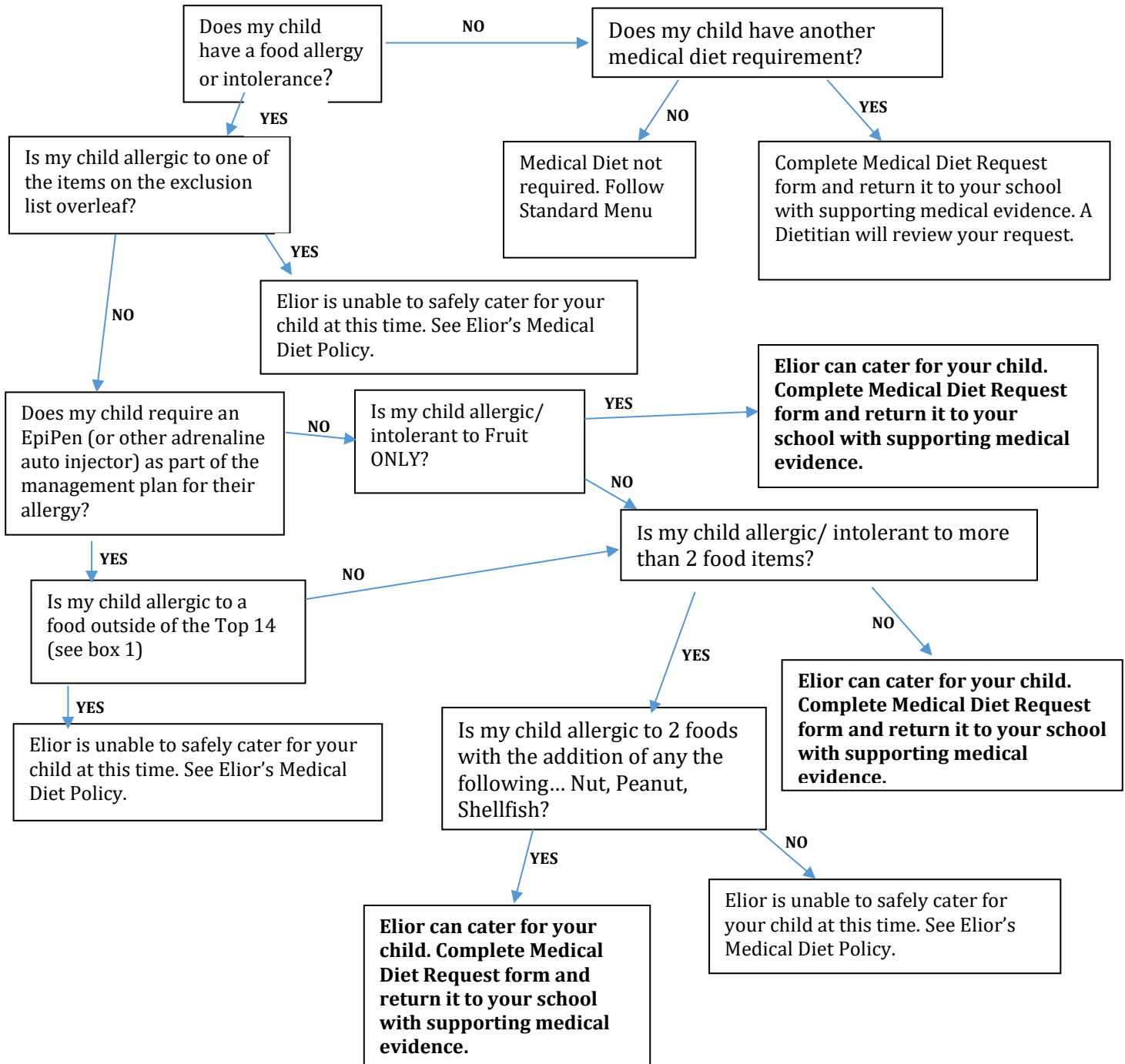
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Appendix 4 - Process for service styles and medical diet meals transported to other locations

- Counter service- Photographs of pupils with medical diets must be displayed in the kitchen area, to ensure that catering staff can identify pupils with medical diet requirements and ensure that the correct menu items are served using all necessary precautions to control cross-contamination risks. Photos will be displayed in accordance with School policy.
- Family service- Dining room supervisor must be aware of any pupil requiring a medical diet and liaise with the cook to ensure that the correct meal is served to the pupil
- Medical diet meals transported to other schools- Meals must be clearly labelled with the pupils' name. Meals must be sealed to ensure that they cannot come into contact with any other foods. School to sign for delivery of medical diet meals and to follow agreed local procedure to ensure that the named meal is served to the correct pupil.
- Other service styles to be agreed locally.

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Appendix 5 - Medical Diet Provision Flow Diagram?



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Appendix 6 - Medical Diet Privacy Notice

Medical Diet Parent/Carer and Child Privacy Notice

In order to ensure that we can provide your child with a safe medical diet, we need to process and store personal data about both you and your child. This data is held in accordance with our data protection policies and in compliance with all legislation. The Taylor Shaw and Edwards and Blake brands are owned by Elior UK plc ("Elior"), and Elior will be the "data controller" and responsible for safely processing your and your child's personal data. Elior will process the following information:

- your child's:
 - name,
 - date of birth,
 - school and year group and
 - details about his or her medical and dietary needs.
- details about your child and his or her condition contained within the medical evidence that you provide, such as a letter from your child's paediatric consultant or dietitian.
- your child's photograph.
- your own:
 - name,
 - address, and
 - contact telephone number and email address, and,
- any other personal data which you provide to us, for example in correspondence between you and us.

Purposes and basis for processing your information

We process your contact details only for the purposes of contacting you in relation to your child's medical diet. If you think the contact details we hold on file are incorrect, or if your contact details change, please complete a Medical Diet - Change of Personal Details form as soon as possible. We process your contact details on the basis that it is necessary for us to ensure your child's school performs its contract with you and provides your child with a safe meal.

Purposes and basis for processing your child's information

We process all personal data about your child only for the purpose of creating a diet recipe template for your child and identifying your child at school premises to ensure he or she receives the correct meal. Medical information is classed as "special" category data under data protection law and this means that, in order to process it in this instance, we need your consent (on behalf of your child) to process your child's data. We will collect this consent on the medical diet request form. Under data protection law, you can withdraw your consent at any time by writing to Nutrition and Dietetics Team, Elior UK, The Courtyard, Catherine Street, Macclesfield, Cheshire, SK11 6ET. It is very important that you are aware that we need your child's medical information to make sure your child is provided with a safe meal and if you withdraw your consent, we may not be able to do so. Again, if any of your child's medical details change or you think the details we have are not correct, it is important that you let us know by completing a Medical Diet – Change to Personal Details form.

Sharing and storing personal data

We will need to share your child's photograph and the menu created for your child with your child's school to ensure that your child receives the correct meal. We will not share any of your or your child's personal data with any other third parties. All of your and your child's personal data will be stored securely either in the UK or within the European Economic Area. We will delete your and your child's personal data once your child has left the relevant school or

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once his or her need for a medical diet has ceased, unless we need to keep the personal data to deal with any claims or complaints, in which case we will keep it for as long as necessary for that purpose.

Your and your child's rights

Data protection law gives both you and your child certain rights in relation to your personal data, which you can exercise by contacting [Nutrition and Dietetic Team, Elior UK, The Courtyard, Catherine Street, Macclesfield, Cheshire SK11 6ET](#). These rights are as follows:

- A right to ask us for a copy of the personal data we hold about you or your child. Please note that the only personal data we hold about you and your child will be personal data that you have already provided to us on the medical diet request form, in the medical evidence or through further correspondence.
- A right to ask us to delete your or your child's personal data in certain circumstances, such as if you withdraw consent to us processing your child's data (though please note the consequences of this set out above) or if we no longer need the personal data. Note that if we are required to keep your personal data to deal with claims or complaints, we may not be obliged to delete all of it.
- A right to ask us not to do anything with the personal data except store it in limited circumstances, such as if you and we do not agree on the accuracy of the personal data and steps are required to validate it.

Questions about your and your child's personal data

If you have any questions or concerns about how we process your or your child's personal data, please contact [Nutrition and Dietetic Team, Elior UK, The Courtyard, Catherine Street, Macclesfield, Cheshire SK11 6ET](#). If you are not happy with how we have processed your or your child's personal data, you can make a complaint to the Information Commissioner's Office, which regulates data protection compliance in the UK. More information is available at their website: www.ico.org.uk.