Allergy & Special Diets Policy and Procedures

For STAHS Prep

1. Overview

STAHS Prep is committed to providing safe, inclusive meals for all pupils, including those requiring special diets for medical needs, wherever possible, in conjunction with our catering partners, Culinera.

Culinera operates robust allergen management systems, maintains accurate supplier information, and benefits from a Primary Authority partnership with Buckinghamshire and Surrey County Councils, who provide statutory advice. However, both the school and Culinera must rely on ingredient information provided by suppliers, just as parents rely on packaging at home.

The safe management of allergens depends on close collaboration between the child, parents/guardians, the school, caterer, and catering team ("the stakeholders").

About Culinera
Culinera are proud to be the caterer of many Independent Schools across England. We strongly believe that proper nutrition has a crucial role to play in helping young people develop and we have worked closely with all of our schools to develop menus that pupils love to eat and are, above all, safe.

Culinera recognises that there are increasing numbers of customers who suffer from food allergies and intolerances. In addition, there are many customers who have food preferences; this can be for many reasons including religion and belief. The aim of this policy is to provide all
Culinera stakeholders with a clear approach to the management of these categories and, above all, minimise the risk of an allergic/anaphylactic reaction to food served.

Culinera is committed to ensuring that:

- There are clear, documented procedures for the management of allergies, intolerances and dietary requirements.
- Every Catering Manager* and team member understands their roles and responsibilities with regards to allergy management.
- Adequate training is provided so that our teams are confident in the role they play in the preparation and service of food to our customers.
- Training is provided for team members on managing allergies.
- Support and clear frameworks are provided to our stakeholders to give a clear expectation of what we can safely offer.

It is important that all stakeholders follow this policy and the procedures within, to ensure that the appropriate actions are put into place.

Despite our best efforts, many school kitchens are small and our food/drink is prepared in areas where cross- contamination may occur; therefore, we cannot guarantee that our dishes/drinks are ever totally free from any allergen. We are unable to take responsibility for any foods brought in by children from home.

Culinera reviews key policies (including this policy) annually and at any time the business believes it is appropriate. Culinera will only re-publish documents if a policy is changed.

**For the avoidance of doubt, the Catering Manager is the most senior person within the on-site school kitchen.*

The major 14 allergens

The Food Information Regulation came into force in December 2014. It requires food businesses to provide information about allergenic ingredients used in any food they sell or provide. There are 14 major allergens which must be mentioned when used as ingredients:

1. **Celery** - stalks, leaves, seeds, celeriac; found in celery salt, salads, some meat products, soups, stock cubes.
2. **Cereals containing gluten** - wheat (spelt, Khorasan/Kamut), rye, barley, oats; found in flour based -foods (baking powder, batter, breadcrumbs, bread, cakes, couscous, meat products, pasta, pastry, sauces, soups, fried foods dusted with flour).
3. **Crustaceans** - crab, lobster, prawns, scampi; shrimp paste (Thai/SE Asian dishes).
4. **Eggs** - in cakes, some meat products, mayonnaise, mousses, pasta, quiche, sauces, pastries, egg washed foods.
5. **Fish** - found in some fish sauces, pizzas, relishes, salad dressings, stock cubes, Worcestershire sauce.
6. **Lupin** - lupin flour and seeds in some breads, pastries, pasta.
7. **Milk** - butter, cheese, cream, milk powders, yoghurt; also in milk -washed foods, powdered soups/sauces.
8. **Molluscs** - mussels, snails, squid, whelks; oyster sauce; fish stews.
9. **Mustard** - liquid/powder/seeds; found in breads, curries, marinades, meat products, dressings, sauces, soups.
10. **Nuts (tree nuts)** - cashew, almond, hazelnut, etc.; found in breads, biscuits, crackers, desserts, nut powders, stir -fries, ice cream, marzipan, nut oils, sauces.
11. **Peanuts** - legumes/groundnuts; used in biscuits, cakes, curries, desserts, sauces (e.g., satay), groundnut oil, peanut flour.
12. **Sesame** - in breads, breadsticks, houmous, sesame oil, tahini; often toasted for salads.
13. **Soya** - bean curd, edamame, miso, textured soya protein, soya flour, tofu; also desserts, ice cream, meat/vegetarian products, sauces.
14. **Sulphur dioxide/sulphites** - dried fruit (raisins, apricots, prunes), meat products, soft drinks, vegetables, wine and beer. (Asthmatics have a higher risk of reaction.)

1.1 Responsibilities by each Stakeholder

Parents / Guardians

- Provide accurate, up to date information about their child's allergies.
- Work collaboratively with all stakeholders.
- Provide medical evidence dated within the last 6 months.
- Evidence must be from a qualified doctor, registered dietitian, or nurse.
- School written care plans, homeopathic diagnoses, and private laboratory tests are not accepted.
- Resubmit updated evidence whenever allergies change, using the BSACI Allergy Action Plan format.
- Only NHS qualified- professionals are acceptable for medical verification.
- Approve medical diet menus when provided.
- Report allergies and special dietary needs directly to the school as soon as they arise.

The Child / Customer

- ALWAYS ask what food is suitable to eat with the support of an adult (young children are encouraged to participate in managing their allergy, but decision-making responsibility remains with the school).
- Do not rely on signage alone; in busy school environments cross contamination risk is higher.
- High and Severe risk pupils who lack the ability or confidence to advocate for themselves, must be chaperoned by a member of the school staff.
- Understand their allergies, symptoms of a reaction, and what to do if they believe a reaction is occurring.

The School

- Manage the full service journey for pupils with allergies.
- Act as the central liaison between Culinera and families.
- When deemed appropriate by the Chef Manager or/and the School, the School will allocate an adult to support a child through service. This will typically be for 'severe' or 'high risk' pupils who lacks the ability or confidence to advocate for themselves
- In these cases, the School will ensure the supervising adult understands the pupil's allergies, symptoms, and response actions.
- Ensure school staff and lunchtime supervisors are adequately trained.
- Provide allergy education to pupils to promote safe, supportive behaviour.
- Act as the data controller and ensure data accuracy.

The Caterer (Culinera)

- Train and induct on-site teams in line with policy and food safety legislation.
- Ensure catering teams are adequately trained on medical diets and allergen management.
- Manage the on-site team to ensure procedures are reliably followed.
- Ensure ingredient and recipe information is accurate, regularly reviewed, and compliant with FIR and future legislation.
- Operate nut free and peanut free kitchens, while recognising cross contamination- risks cannot be eliminated.

- Do not participate in reintroduction or partial exclusion of allergens (e.g., we cannot differentiate cooked vs raw egg).
- Do not communicate with parents without the school involved.

The School-based Catering Team

- Follow all food safety legislation and published allergen policies.
- Challenge/escalate concerns before issues escalate.
- Complete training as per policies.
- Will support the School by following the STAHS Prep Allergy and Anaphylaxis Management Procedures

1.2 Regulatory Framework & Key Principles

- UK food safety is based on the 14 legally recognised major allergens (EU14).
- Allergens outside the EU14 require bespoke, case by -case risk assessment, planning, and agreement between stakeholders.
- Cross-contamination risk cannot be fully eliminated, especially when school kitchens are used by external groups (e.g., PTA events).
- This policy operates alongside statutory legislation including Natasha's Law and relevant food regulations.
- Despite robust systems, no food can be guaranteed completely allergen free.

2. Allergy Reporting & Documentation

Parents must report allergies and special diets **directly to the school**, not via the caterer.

Communication requirements

- All communication must be in writing (not verbal).
- All parent to caterer communication must involve the school.
- The school is the data controller for all medical diet information.

2.1 Operational Model

Recipe Bank Menu Model

- Menus built using Culinera's Indicator recipe software.
- Final menu is published without allergen declarations and follows a 2-4 week seasonal rotation.

- Catering Manager communicates directly with parents of known allergy pupils (avoids reliance on printed allergen charts).
- Menu written centrally, typically stable for at least half a term.
- Child specific care plan agreed in advance.
- Only pre-approved dishes may be used.
- Backup dishes are pre-set.
- All dishes documented using FS13.
- A daily double-check of the care plan ensures no mismatches.

2.2 Noncore- Items

Includes: sides, accompaniments, morning break items, salad bar, and variable production items.

The Catering Manager uses the Culinera Allergen Monitoring Matrix:

- Completed daily based on real time deliveries.
- Records substitutions and supplier changes.
- Determines what is safe to serve each day.
- Safety is confirmed in person at service, with a teacher accompanying the child.

3. Service Procedures

Culinera categorises allergy risk into four levels:

1. Manageable with Controls - intolerance to a top-14 allergen.
2. Medium Risk - top14 allergen requiring no EpiPen (e.g., antihistamine such as Piriton). High Risk - anaphylaxis risk requiring an EpiPen to a top-14 allergen.
3. **Severe Risk - complex allergies to multiple top-14 allergens or to ingredients outside the top-14 that present a high control requirement.**

3.1 Expectations for ALL Pupils with Allergies

- Each child must have an Allergy Action Plan.
- Hand-washing encouraged before meals.
- Sanitiser stations available.
- Pupils must appropriately understand their allergy and the process.
- Photos must **not** be the sole identifier.
- Will follow the STAHS Prep procedures to help identify themselves to the catering staff. This currently includes wearing an identifying lanyard with dietary information and a red wrist band if the child has an allergy.

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3.2 Expectations for High Risk & Severe Risk - Pupils

- Must be accompanied by a member of the school team, when deemed appropriate by the School and Chef Manager
- Parents and Chef must agree menu options in advance.
- Allergy Action Plan must be displayed (laminated) at the serving area.

4. Parent Communication & Allergen Discussions

Before service, or after a newly reported allergy, the Catering Manager will meet with parents to:

- Identify allergens and requirements
- Review safe food options
- Establish clear, ongoing communication channels
- Ensure all communication routes include the school
- Caterer must not communicate directly with parents without school involvement.

5. Management of Non-EU14 Allergens

Some pupils may have allergies outside the EU14 (e.g., legumes, fruits).

5.1 Individual Parent Consultation

Meeting will cover:

- Specific allergen
- Risk severity
- Operational adjustments
- Feasibility of safe catering
- Agreed control mechanisms.

5.2 Risk Assessment and Outcome

Following the meeting, Culinera will conduct a risk assessment to provide next steps, which may be one of the following outcomes:

- Special Medical Diet Menu
- Limited Menu (where available)
- Packed lunch from home.

6. Special Medical Diet Menu

Pupils who fall into **High Risk** or Severe **Risk** categories - or where it is agreed as part of the safe management of their allergies or medical needs - will have a Special Medical Diet Menu created. This bespoke menu is tailored to the pupil and is separate from the main published menu.

- Menu is created to exclude allergens where possible.
- Must be signed off by parents before first service.
- If ever in doubt on a suitable dish, the catering team will provide the safe dish.

Medical diet - implementation procedure

Prior to any pupil with a medical diet requirement being served a school meal:

- All data as per this policy will be provided.
- The caterer will create a menu.
- The parent/carer approves the menu in writing to Culinera and the school, confirming consent for the start date. If email is not available, the finalised menu can be printed twice by the school.
- The school prints the agreed menu in colour and provides the final menu to the kitchen team.
- Culinera does not offer a medical diet service for pupils on dietary trials or elimination trials.
- Culinera will not participate in the reintroduction or partial exclusion of allergens (e.g., we cannot support reintroduction of milk via a milk ladder).

Medical Diet Menu - on-site procedure

- Culinera will create a specific medical diet for each pupil.
- Any proposed medical diet will be based on the school's menu cycle where possible.
- The Medical Diet Menu encompasses all variations of specific food allergies.
- Communication with all stakeholders is important to ensure correct understanding at all levels.
- When parents notify a change to a pupil's medical dietary needs, the process must be re-run.

Preparation of Medical Diet Menu

- All Culinera staff complete annual allergens training in our online learning environment.
- Staff follow recipes exactly (correct ingredients/quantities; no substitutions) so that each dish matches the specification in the medical diet template. If a recipe method conflicts, only ingredients in the core ingredient list may be used.
- Staff follow best practice to minimise cross contamination and our core cleaning standard of "clean as you go-".
- Staff are only permitted to cook and serve the exact recipe detailed in each medical diet template for each named pupil, each day. No deviation is permitted on request from the school or parents/carers without consultation and agreement from Culinera.

Service of Medical Diet Menu

- Pupils with a Medical Diet Menu have their photo displayed in the internal kitchen area using Culinera's "Think of Me" poster, accompanied by a copy of their Special Medical Menu (for identification and accuracy).
- Each pupil with a medical diet must follow the Severe Risk serving procedure within this policy and cannot use the self-help- salad bar.

Review process for Medical Diet Menu

- Medical Diet Menus will be reviewed when parents provide updated medical evidence which changes the menu required.
- Culinera will not provide a Medical Diet Menu for complex medical needs deemed too complex or high risk to manage at site level. In this circumstance, the request will be referred back to the parent/carer and it may be that the only appropriate solution is a packed lunch from home.
- No Medical Diet Menu will be put in place without adhering to this procedure.
- In some circumstances, access to our Limited Menu may be available.

7. Duty of Care & Compliance

All stakeholders must balance safety and operational practicality while ensuring consistency across all allergens.

This policy is reviewed annually, or earlier if:

- Legislation changes
- Operational guidance changes
- Industry standards change

All catering staff must follow this policy to ensure safe, consistent allergen practice.

8. Right to Decline Catering for High Risk- Cases

Culinera reserves the right to refuse meals or only provide basic "safe meals" if:

- The allergy is too complex, or
- The risk is too high to manage safely on-site

This is essential for pupil safety. Despite all controls, cross contamination- cannot be fully eliminated, and no meal can be guaranteed allergen free-.

9. Our Position on Nuts and Peanuts

- Culinera does not use nuts in any of the food that we prepare inhouse and serve; therefore, we operate nut- free- kitchens*.
- We limit ingredients labelled “may contain”, but we cannot guarantee dishes/products are totally free from nuts/nut derivatives (e.g., croissants produced in factories handling nuts; bread baked on lines handling nuts; some machines lubricated with nut oil).
- We cannot take responsibility for any foods brought in packed lunches that contain (or may contain) nuts.

** Teams are asked to politely refuse gifts which may contain nuts (e.g., chocolate). Clients are encouraged to give such gifts outside the kitchen and catering environment.*

10. Legal & Regulatory Framework

This policy aligns with (including but not limited to):

- Food Information Regulations (FIR)
- GDPR obligations in managing medical diet data
- Natasha’s Law
- Broader UK food safety legislation regarding allergen disclosure

11 - FAQs

What is a medical diet?
A medical diet is a medically prescribed therapeutic diet as a treatment for a medical condition. Our medical diet procedure also includes special diets required for pupils with food allergies or food intolerances. A Medical Diet Menu will **not** be provided for any pupils on allergen trial diets including exclusion or reintroduction diets.

What is not a medical diet?
Religious, cultural or personal preferences and dietary trials or elimination diets. These diets can all be met through our standard menus.

Why do I need to provide medical evidence?
Medical confirmation is required so Culinera has all necessary information to safely prepare a Medical Diet Menu for your child.

I don't have medical evidence, what do I do?
Culinera is unable to provide a medical diet without the required medical evidence. If you suspect your child has an allergy/intolerance please approach your GP.

My child can eat some things that contain their allergen but not others. Why does your Medical Diet Menu remove all items? My child is partially reintroducing allergens - do you cater for this?
Due to varying degrees of tolerance when reintroducing allergens - and the reintroduction process requiring parental monitoring - Culinera does not participate in partial reintroductions of any kind.

My child's meal is very different from what the other children are eating - why?
Although Culinera tries to ensure medical diet meals reflect the wider menu wherever possible, it may be that your child's allergens are such that they require an alternative meal to be made on a specific day.

My child no longer needs a medical diet - what now?
Please provide your school with a letter from your GP, paediatric consultant or dietitian specifying that your child is no longer allergic/intolerant to their allergen(s). The letter must confirm that the allergen can now be reintroduced in full to your child's diet.

Why are some dishes repeated across my child's Medical Diet Menu?
Where a child has multiple allergies, options may be restricted and repeated to ensure a suitable meal can be provided.

To what degree is my child's medical diet free from allergens?
Despite our best efforts, food/drink is prepared in areas where cross contamination may occur; therefore, we cannot guarantee dishes/drinks are totally free from any allergen. We are unable to take responsibility for any foods brought in by children in packed lunches that may contain- nuts.

My child has Type 1 Diabetes - can Culinera provide a carbohydrate count?
Yes. Continue with the Medical Diet Menu process and a carbohydrate count will be provided (typical portion size, carbohydrate per serving, and per 100g) generated from our menu management system using manufacturer/supplier data.

My child has autism and will only eat certain foods - do they need a Medical Diet Menu?
No - this can be managed locally at the school unless there are other requirements such as allergies.

I have other questions not included - what should I do?
Please speak to the school office. They will provide details or, if needed, contact the appropriate person within the Culinera operational team or the Special Diet Team.