



# **Whole School Food Policy**

## **Including Specific Dietary Requirements and Food Allergy Management**



**March 2025**

**ITALY**

### 1. Introduction

A healthy, balanced diet makes an important contribution to children's growth and development, to their educational performance and attainment and to their long-term health and well-being. The School recognizes the important connection between a healthy diet and a pupil's ability to learn effectively and achieve high standards in school.

The school is committed to providing an environment that promotes healthy eating and enables pupils to make informed choices about the foods they eat. This is achieved by a whole school approach to food as documented in this policy. We attach the highest importance to always ensuring continued compliance with national and regional legislation, recognising that compliance with food safety and health and safety legislation is fundamental to maintaining high catering standards.

### 2. Objectives

- To ensure that all food and drink served is in line with national and local government mandatory standards, is varied, is served in appropriate portion sizes, looks good and tastes good.
- To ensure that all aspects of food and nutrition in school promote the health and well-being of the whole school community.
- To ensure that all members of the school community are able to make informed food choices and are aware of the importance of healthy food, where our food comes from and the need to support sustainable food and farming practices.
- To make every reasonable effort to ensure that food provision in the school reflects the ethical and medical requirements of pupils and staff and that all relevant staff members are aware of this.
- To involve the school community in all aspects of food in schools.
- To ensure that all staff involved in food preparation, including for example in fund-raising events and food technology lessons, demonstrate good food safety practices (Menarini Baby site).

### 3. Guidelines

#### 3.1 Food and drink provision throughout the school day

- Pupils are expected to bring a named water bottle to school. Water fountains are provided at various points around the school in the Matteotti site, and in Lavagnini they are located in the hallway. Pupils are encouraged to drink water in class and at breaks and lunchtime.
- The school and its caterer meet the nutritional standards for school meals.
- The school provides food in accordance with pupils' religious beliefs.
- Breakfast is an important meal which should provide 25% of a pupil's energy requirement and supports them to be ready to learn at the start of each day.

Dining rooms should be pleasant environments, which help to promote a positive social lunchtime experience. Staff are actively encouraged to sit with the pupils at lunchtime.

#### **School meals organization:**

*Nursery, Preschool, Primary School*

The canteen service takes place during school hours and it is considered a part of educational activities. Pupils eat in the canteen in groups, which are formed following their own class's composition. Teachers are responsible for assisting pupils during lunch. This aims to ensure a positive atmosphere and to foster an educational involvement in both nutritional and social terms. During lunch, teachers must supervise their pupils at all times. For this reason, it is essential that they sit at the table with them and that they eat their meal in company of the students.

### *Middle School*

Pupils eat in the canteen in groups, which are formed following their own class's composition. Technical assistants and cleaning staff have a supervisory role and are required to assist pupils at lunchtime during the serving of meals. One teacher at a time, taking turns, will assist the technical assistant in supervising the pupils; teachers will carry out this supervision by moving around the canteen premises.

## **3.2 Curriculum**

There is a consistent message across the whole School curriculum about healthy eating. Through Science, Food Technology (where applicable) and PSHE, pupils are taught about healthy and balanced diets, about the nutritional aspects of food and about food handling hygiene, so that students are able to make informed choices about food.

The school works with its caterers to encourage pupils to take part in special themed meals as part of the wider School curriculum.

In the Nursery, children take part in food handling activities, in order to explore different consistencies, colours and smells through sensory play and creativity laboratories.

## **3.3 Outside the classroom (incl. breaktimes)**

Where schools allow pupils to bring in their own snack from home, parents/guardians should be made aware of appropriate healthy snacks for pupils as well as those items which should not be brought into school.

The School provides a snack during the morning break (for Nursery and Preschool pupils) and a snack during the afternoon break (for Nursery, Preschool and Primary School pupils). The snacks must be healthy and any foods that may contain allergens that could increase risks for pupils with potentially life-threatening food allergies are avoided.

Middle School students may bring a healthy snack from home, consisting of fresh and unsweetened fruits or vegetables (e. g. carrots or similar). Unhealthy snacks, such as sweet or industrial snacks, are not recommended; instead, any nutritious and balanced snacks are preferred.

Foods and drinks vending machines are a service that the School provides in the Matteotti site, available to both Middle School pupils and staff members. The vending machines are intended for occasional use only and are not a substitute of good practices such as bringing snacks from home.

In accordance with the Guidelines on Prevention and Health Promotion, the School provides a selection of healthy foods through the vending machines, including options suitable for those who are allergic to gluten and certain types of allergens.

## **3.4 Food and drink brought into school.**

Any foods and drinks brought into school by pupils, parents or staff should meet the ethos of this policy. Foods and drinks brought into school as part of an external hire must meet all current food hygiene regulations and adhere to individual school guidance (e.g., nut free environments).

It is essential to safeguard both children and teachers:

- In order to avoid any unpleasant consequences related to allergies and intolerances, it is not permitted to bring into the School food from outside for collective consumption, the only exception being the snacks provided by parents;
- It is not permitted to celebrate birthdays and other individual anniversaries at school, if they require consumption of handcrafted foods by parents or business owners. Only products that are packaged and show a label highlighting the expiration date, a list of ingredients and the legal accountability for production are allowed;

It is forbidden to bring to school:

- Walnuts, hazelnuts, seeds and other types of dried fruit (due to allergies)
- Cakes covered or filled with fresh or whipped cream or ice cream (due to deterioration/spoilage risks)
- Candies or pop corn (due to choking risks)
- Chocolate (highly likely to contain nuts)
- Fresh fruits on cakes
  - Small fruits, such as grapes or berries (due to choking risks)
  - Kiwis, strawberries and any fruits that are considered allergenic

Therefore, consumption of foods from other external sources at school is prohibited, the only exception being snacks that parents provide exclusively for their own children.

Teachers that authorize the consumption of foods and drinks in the classroom, become automatically responsible for supervising any damage that these may cause to the pupils.

For further information, please see **Appendix 1 – Golden Rules for bringing shared food at school.**

### 3.5 School Events

The school aims to ensure that healthy food and drink options are available at all events including celebrations and fund-raising events. On special occasions, however, treats will be allowed, but always keeping safety in mind and avoiding risky foods.

### 3.6 Special dietary requirements

Individual Healthcare Plans with Emergency Procedures and Medical Risk Assessments are created for pupils with food allergies and special dietary requirements. These Plans document symptoms and adverse reactions, actions to be taken in the event of an emergency and emergency contact details (Further information is available in the Specific Dietary Requirements section of this Policy).

## 4 Special dietary requirements including Food Allergy Management

The School recognises that a number of pupils, parents, visitors and staff may suffer from potentially life-threatening allergies or intolerances to certain foods or have specific dietary requirements.

The School is committed to a whole school approach to the care and management of those members of the School community.

The School's position is not to guarantee a completely allergen free environment. The School will minimise the risk of exposure by hazard identification, instruction and information. This will encourage self-responsibility to all those with known allergies they are able to make informed decisions on food choices.

It is also important that the School has robust plans for an effective response to possible emergencies.

- 4.1 The school will establish clear procedures and responsibilities to be followed by staff in meeting the needs of pupils and staff with additional dietary requirements.
- 4.2 The school will ensure that it has up to date completed medical information for each pupil. This may be recorded on the school's MIS. Parents/guardians are required to update this information as and when necessary to ensure the dietary requirement information held by the school is current and valid.
- 4.3 The school is asked to verify the pupil's dietary requirements with supporting evidence from doctor or qualified health professional, such as a dietician. The school will complete an Individual Healthcare Plan (IHP) and a medical risk assessment for pupils with life threatening food allergies/Type 1 diabetes.
- 4.4 A meeting will be arranged between the school's H&S Coordinator, the catering and facilities manager, the Educational Coordinator, the class's teachers and the parents/guardian of any pupils with a life-threatening food allergy/Type 1 diabetes to discuss the pupil's specific dietary needs. The risk assessment will be completed after the meeting. The information gathered will then be shared with the external catering service's managers.
- 4.5 Pupils with Type 1 diabetes need to know the carbohydrate content of their meals in order to calculate their insulin dose and manage their condition effectively.
- 4.6 A Dietary Requirements Register should then be completed by the school. This register will be divided into 3 categories:

**RED** category – Pupils with life threatening food allergies and Type 1 diabetes

**BLUE** category – Pupils with other food allergies and Coeliac disease

**GREEN** category – Pupils with other specific requirements such as religious beliefs, vegetarian, vegan

The register should contain:

- An up-to-date photograph of the pupil
- The pupil's full name and class/year group
- The pupil's food allergy/dietary requirements
- For the **RED** category, whether the pupil has been prescribed an adrenaline auto-injector.
- Additional methods used by the school to identify each pupil (e.g., specific meal labelled with pupil's name, surname and class; orange lanyards with a tag presenting the pupil's picture, name, class and the foods they cannot eat).

Once completed, a copy of this register should be available to all technical/cleaning staff and teaching staff involved in portioning and assisting meals. It should also be displayed in the school Medical Room and Kitchen area (out of general public view)

- 4.7 The school is responsible for establishing an allergen management system for any foods.
- 4.8 The school will ensure that all staff have access to allergy awareness training and information on the dietary requirements of all pupils.

Technical/cleaning and teaching staff involved in food portioning undergo regular HACCP training, as required by the current legislation.

### 4.9 Caterer responsibilities

- At the beginning, of each academic year, the external catering service will share with the school: a monthly planned menu for the length of the whole academic year, specific menus for the different special diets, and a list of all the raw materials and allergens contained in each daily menu. The school's catering service menus are designed in accordance with the National Guidelines on Food Hygiene and Nutrition. Issued by the relevant local health authority and are subject to approval.
- The catering manager will liaise with the school/school nurse prior to the start of each term to obtain/update all the necessary dietary information on those pupils with specific dietary requirements. The register should be updated at least termly or more frequently if required.
- The catering manager will offer to support the school and meet with parents/guardians and any pupil with specific dietary requirements as required and to document specific management requirements.
- The catering team will ensure that all sensitive pupil information remains confidential and is not on public display.
- Where possible, menus should be planned to minimise the use of allergenic ingredients. In schools where there are numerous pupils with food allergies, catering managers should consider adding an 'allergy free' option on the daily menu.
- Specific menus should be prepared in advance for those pupils within the **RED** category and a separate meal prepared if the food on the main menu is not suitable for them. Meals must be carefully prepared in the kitchen in order to minimise the risk of cross-contamination. The external catering service the school has a supply contract with, will ensure that meals for special diets are prepared using separate production processes. Meals are packaged in the Kitchen and are labelled with the pupil's name.
- The external catering service guarantees:
  - To only purchase all produce from a nominated company or supplier where full allergen data is available for review;
  - To diligently check allergen information provided by their suppliers and to challenge cases in which the information received is insufficient. Particular attention must be paid to any substitute items that may contain allergens.
- The catering team will ensure that all food preparation and storage practices recognise the potential for cross-contamination between foods and the need to control allergens in this respect. An allergen label should be used for any products that are made inhouse.

### 4.10 Parent/Guardian responsibilities

- Upon registering their child at school, parents/guardians will provide the school with full medical information and details of any dietary requirements.
- Parents/guardians will ensure that they inform the school if there are any changes to the current information for their child on dietary requirements held by the school.
- Where the pupil has a life-threatening allergy/Type 1 diabetes, parents/guardians should be invited to meet with the school and catering manager to discuss and document any specific management requirements such as a required special meal.
- It is the responsibility of the parent/guardian to provide the school with up-to-date medication/equipment clearly labelled in its original container.

### 4.11 Pupil responsibilities

- If appropriate to their age and maturity, the pupil and class teacher will meet with the catering manager. The aim of the meeting is for the pupil to understand how their food will be served and how food allergens, where applicable, will be notified.
- At an age-appropriate level, pupils should be taught to recognise symptoms and be able to take responsibility for recognising any foods that they should avoid.

### 4.12 School lunches

- Lunchtime supervisors/staff should have completed allergy awareness training as well as training in the administration of adrenaline auto-injectors. They should also have familiarised themselves with the Dietary Requirements Register for all three categories (**RED**, **BLUE**, **GREEN**) and be aware of the needs of pupils with specific dietary requirements including life threatening food allergies.
- Allergen information signage must be displayed in a prominent position in each food service area.
- Pupils should be encouraged to wash their hands before and after eating.
- All staff will follow the school lunchtime procedure which takes into account the needs of pupils with specific dietary requirements.

### 4.13 School trips and events

In cases such as packed lunches, snacks, school clubs and all other moments when food is served, the school will send a specific request to the catering team, containing all the details of the participating pupils' food allergies.

## 5 Food Safety

### 5.1 Training and competency

The catering team, whether an in house or external service, will be monitored to ensure adequate levels of competency are maintained. As a minimum this will include:

- The appointed Catering Manager and catering staff must have completed the following trainings:
  - HACCP (Hazard Analysis Critical Control Points) for food hazard awareness.
  - Firefighting / evacuation procedures and electrical safety.
  - Emergency procedures and shut-off of gas/electricity.
  - Basic risk prevention training including electrical safety.
- All catering staff must have clearly allocated responsibilities as described in detail in comprehensive Job Descriptions, which they understand and implement as per established procedures. The school must maintain records of training and conduct ongoing refresher training.

### 5.2 Infection Control for Food Handling and Catering Staff

The school's catering service recognizes that food handlers and catering staff may present a particular risk to the health of pupils and staff if they become infected (or have close contact) with diseases that can be transmitted to others via the medium of food or drink. These diseases commonly affect the gastrointestinal system (stomach and bowel) and usually cause diarrhoea or vomiting, or both.

The school's catering service grants that food handling staff suffering from such diseases will be excluded from all food handling activity in the school until they are advised by a doctor they can return to work.

Food handlers are required to inform their employer immediately if they are suffering from a disease that may cause food poisoning:

- typhoid fever
- paratyphoid fever
- other salmonella infections
- dysentery
- shigellosis
- diarrhoea (cause of which has not been established)
- infective jaundice
- staphylococcal infections likely to cause food poisoning like impetigo, septic skin lesions, exposed infected wounds, boils.
- E. coli VTEC infection

For staff's hygiene operating procedures, please see the specific Hazard Analysis and Critical Control Point (HACCP) for each site. This is approved and validated every two years by a laboratory specialising in foods, water and environmental analysis and consulting.

## 6 Monitoring and Evaluation

In addition to the implementation of policy and general procedures, staff presentation and hygiene systems will be continually monitored by external, local authority audits (normally 3 times a year), internal H&S audits, and termly KPIs. Systems will be established to ensure the following minimum standards:

- Ongoing consideration of healthy eating options.
- Monitoring of existing and potential allergy conditions to ensure the safety of all staff and pupils.
- An effective HACCP (Hazard Analysis and Critical Control Point) system is in place.
- Monitoring of staff in order to ensure that food safety and management procedures are followed without exception.
- Compliance with a daily cleaning and disinfection regime.
- All staff wear appropriate uniforms and protective clothing whenever they are in food handling areas.
- Ongoing compliance with the hand-washing regime.
- Inspections and temperature checks, where appropriate, for all incoming produce and supplies before acceptance.
- Rejection of any non-compliant items.
- Arrangements established for the safe transit and proper storage of food supplies.
- Inspection systems of all areas where food is prepared, served and consumed for cleanliness and hygiene at both the start and end of every meal.
- Monitoring of the dining room, counters, and trolleys for dirty plates, cutlery etc, together with the containers and bins for waste food throughout the service of every meal.
- All spills are dealt with promptly and safely.

- The checking (and recording) the temperatures of the hot and chilled service counters on a daily basis and reporting any faults promptly.
- Temperature checking systems with a probe of all High-Risk items cooked.
- The external catering staff guarantees to check all kitchen equipment on a daily basis in order to ensure that it is functioning properly.
- Where appropriate, the school will undertake an annual gas inspection of all its catering facilities (Menarini Baby Nursery site).
- Arrangements for routine professional deep cleaning, including ducts and extraction systems on an annual basis (Menarini Baby Nursery site only).
- Ensuring that the school pest control regime is implemented.
- Arrangement of hygienic disposal of waste in accordance with recommended practice/local regulations.
- Support in the management of a re-cycling regime for: paper, card, clean glass and clean tins in accordance with the School's recycling policy.

### Appendix 1

#### Golden rules for bringing shared food to school

Our school fosters healthy eating habits, prioritising the well-being and health of our entire community. We implement procedures and take all reasonable measures to ensure our food offerings respect the ethical, religious, and medical needs of students and staff.

Families are welcome to bring food to share with the class or school community on birthdays and for special occasions defined by the school. On occasions like Carnival, Halloween and Christmas, indulgent snacks are allowed—but always with safety in mind, avoiding risky foods.

For this reason, we ask all families to carefully follow these 5 food golden rules:

| FOOD GOLDEN RULES | WHAT                  | WHY                                                                                                                                                                                                                                                             |
|-------------------|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Nut free</b>   | Nut free school       | We have students with severe nut allergies. By maintaining a nut-free school, including for individual snacks, we ensure the safety of all students and of the entire school community.                                                                         |
| <b>Respectful</b> | Check class allergies | We provide a list of allergies in your class/section at the start of the year. This helps parents be aware of classmates' allergies and choose safe treats. If you need the list, please request it at the school                                               |
| <b>Safe</b>       | Food safety rules     | For shared food, like birthdays and special occasions, only store-bought foods from supermarkets, bakeries, or ovens are allowed (with ingredient list and expiration date). These should not contain:<br><br>1. Nuts, seeds, or dried fruit (due to allergies) |

|               |                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |                    | <p>2. Fresh cream or whipped cream, icecream (due to spoilage risks)</p> <p>3. Candies or popcorn (due to choking risks)</p> <p>4. Fresh fruits on cakes</p> <ul style="list-style-type: none"> <li>- Small, such as grapes or berries (due to choking risks)</li> <li>- Allergens, as strawberries and kiwis</li> </ul> <p>Be careful with chocolate (may contain walnuts, hazelnuts)</p> <p>“May contain traces of” are generally allowed</p> |
| <b>Easy</b>   | Easy to serve      | Easier for teachers to serve and reduces waste. We suggest simple cakes, preferably individual small portions like muffins, like sweet or savory focaccia, mini pizzas, or a plain sponge cake (es. Margherita) or crostata.                                                                                                                                                                                                                    |
| <b>Simple</b> | Keep things simple | No balloons, gift bags, or extra decorations for birthdays. We are a school, and birthday celebrations should remain simple and fun within school hours. Gifts and decorations are better suited for celebrations outside of school. Birthday photos are only for Nursery and Preschool as part of educational activities. Parents are not allowed to enter the school to take photos.                                                          |

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|-----------------------------------|-------------------------------------------------------------------|
| <b>Ownership and consultation</b> |                                                                   |
| Document sponsor                  | Head of Health & Safety – Europe                                  |
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| <b>Document application</b>       |                                                                   |
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**Whole School Food Policy**

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|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Current review date          | June 2023                                                                                                                                                             |
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| <b>Related documentation</b> |                                                                                                                                                                       |
| Related documentation        | Health and Safety Policy<br>Pupil Health & Wellbeing Policy<br>LO 8/2021 de 4 de junio, de Protección Integral a la Infancia y la Adolescencia frente a la violencia. |