

## CHARTWELLS MEDICAL DIET POLICY

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| <b>10</b>  | <b>PURPOSE/SCOPE</b>   |
|            | <p>The purpose of this policy is to detail Chartwells responsibilities and commitments in providing medical diet support to customers.</p> <p>For the purpose of this policy 'the customer' refers to the pupil requiring the medical diet including any parents or guardians. 'The client' refers to the school, university, college, local authority or third party to whom Chartwells are contracted to provide catering services.</p> <p>This policy on Chartwells medical diet provision should be used in conjunction with the Chartwells Medical Diet procedure.</p>  |
| <b>20</b>  | <b>POLICY STATEMENT ON MEDICAL DIETS</b>   |
|            | <p>Medical diets are an important part of Chartwells catering provision and the safety of the customers we cater for is our number one priority. A medical diet is defined as diet whereby the standard catering provision is unsuitable and requires adaptation to be made safe for a customer due to a medically diagnosed dietary requirement. Examples of medical diets include diagnosed food allergies and intolerances.</p> <p>As part of Chartwells mission to nourish the young minds of our customers, we strive to provide customers with medical diets with the same opportunities to enjoy our food as their peers and we are committed to making reasonable adjustments for medical diets, providing it is safe to do so. We believe it is our responsibility to encourage customers to try new foods as part of a balanced diet therefore we do not accommodate for taste aversions or preferences and will not consider this a medical diet requirement.</p>   |
| <b>3.0</b> | <b>MENU PROVISION FOR MEDICAL DIETS</b>  |
| 3.1        | Chartwells medical diet provision will be in line with LACA National Allergen Management Policy guidance, an industry-wide code of conduct for the management of allergens in schools.   |
| 3.2        | Chartwells food development team will aim to minimise allergens within their core menu recipes as far as possible.   |
| 3.3        | <p>All medical diet requests will be considered by Chartwells on a case-by-case basis as part of the medical diet risk assessment process, which considers the nature of the requirement and the capabilities of the kitchen concerned (See appendix 1 – Risk Assessment). Chartwells will make all reasonable steps to provide for a medical diet providing this assessment indicates that the risks are within safe limits. Unfortunately, where the risk to the customer is high we may be unable to provide a medical diet.</p> <p>Chartwells will notify the client and the customer of the result of any assessment where the risk is so high that a medical diet cannot be provided, without delay. In the event of such risk assessment result and decision, Chartwells will not provide any medical diet or other diet to the customer and the client must take appropriate measures to ensure that other allergen risks for the customer are controlled (including any risks relating to airborne allergens from food consumed by other customers).</p> <p>Clients are required to support customers and Chartwells in providing an up-to-date photo to assist the identification of such customers for these purposes. Photos should be provided by</p> |



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|      | clients at a minimum annually and sooner, if the appearance of the customer changes significantly in the intervening period.   |
| 3.4  | <p><i>State primary schools &amp; academies only:</i></p> <p>The Chartwells 'Allergy Aware' menu will be provided to customers with allergies to any of the 14 mandatory listed Food Information Regulations (FIR) allergens or combinations thereof, providing the menu assessment process detailed in point 3.3 deems it safe to do so. The Allergy Aware menu is a reduced-allergen menu which does not include the majority of the 14 FIR allergens. The Allergy Aware menu aligns itself as closely as possible to the main menu offer.</p> <p>On theme days, Chartwells Allergy Aware menus can be provided for customers with allergies to any of the 14 mandatory FIR allergens only.</p>  |
| 3.5  | Medical diet requests for allergens which are not part of the 14 mandatory listed allergens under FIR will reviewed via the medical diet risk assessment process as detailed in point 3.3. Chartwells may be required to decline a medical diet menu request where the risks are determined to be too significant to the customer.   |
| 3.6  | Medical diets which are not allergen-related (such as texture-modified dysphagia requirements, sensory disorders, autism and phenylketonuria (PKU)) will be considered by Chartwells on a case-by-case basis.  |
| 3.7  | Religious and cultural diets are not classed as a medical diet and therefore do not require a medical diet request form. Customers should inform the client and catering team on site about any religious or cultural requirements to make arrangements where appropriate.   |
| 3.8  | <p>If Chartwells become aware of any medical diet requirement which has not been properly notified in accordance with this Policy, it may refuse service. For the avoidance of doubt, service will always be refused in these circumstances unless and until the client confirms, with Chartwells agreement, that the relevant customer can manage their menu choices and authorises Chartwells to provide service.</p> <p>Chartwells will notify the client and the customer of any decision to refuse service in these circumstances. Clients are required to support customers and Chartwells in providing an up-to-date photo to assist the identification of such customers for these purposes. Photos should be provided by clients at a minimum annually and sooner, if the appearance of the customer changes significantly in the intervening period.</p> |
| 3.9  | Medical diet menus will not be prepared by the central Chartwells nutrition team for customers in Secondary or Higher and Further education settings. We believe that our menus in Secondary, Higher and Further education provide sufficient choice to allow customers to manage their own medical diets. Chartwells will ensure that allergy reports are always available to customers which will allow them to make informed menu choices. This is in line with other out of home catering settings.  |
| 3.10 | Whilst a medical diet menu is being prepared, Chartwells can provide a jacket potato with suitable topping and fruit for dessert, otherwise customers should provide a packed lunch meal as an interim measure.  |



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| 3.11       | Chartwells medical diet menus will ensure that one suitable hot dish is available per service.  |
| 3.12       | Only the recipes detailed on the Chartwells-approved medical diet menu will be served to the customer. Deviations to the medical diet menu are not accepted.  |
| 3.13       | In the instance that it is not possible to prepare the approved medical diet menu recipe at any given meal, the customer will be served a jacket potato with a suitable topping and fruit for dessert (on condition they are not allergic to these ingredients).  |
| 3.14       | Medical Diet menus will be prepared for main hot meals and will not include mid-morning breaks, breakfast clubs, after school club snacks, salad bars or daily cold or packed lunch options. Chartwells do not take responsibility for ensuring pupils are safeguarded from consuming inappropriate foods when pupils are self-serving.   |
| 3.15       | School menus must be fully compliant to the school food standards (State Primaries & Primary Academies) and Chartwells menu standards prior to a medical diet menu being prepared.  |
| 3.16       | Medical diet menus cannot be supported if the school menu does not use The Source (Chartwells recipe & menu database).  |
| 3.17       | Medical diets menus are always double-checked by two trained Chartwells colleagues prior to implementation as a safety precaution   |
| <b>4.0</b> | <b>MEDICAL DIET REQUESTS &amp; PROCESSING</b>   |
| 4.1        | Customers requiring a medical diet menu must complete the Chartwells Medical Diet Request form in full and submit with supporting evidence  |
| 4.2        | It is the client's responsibility to ensure customers are aware of Chartwells medical diet policy and to direct them to Chartwells medical diet request form. It is also the client's responsibility to provide assistance to the customer in accurate completion of the form, if the customer cannot complete or understand the form, for example due to language or learning difficulties.  |
| 4.3        | <p>Medical diet request forms must be accompanied by supporting professional medical evidence OR a completed Chartwells Medical Evidence Support Form in order to be processed. Adjusting a child's diet should only be done under the guidance of a medical professional. This requirement is an industry-wide standard and is essential for the safeguarding of Chartwells customers.</p> <p>The following conditions apply to the medical evidence:</p> <ul style="list-style-type: none"><li>i. A professional medical source includes a medical doctor, registered dietitian, nurse or other qualified NHS medical professional</li><li>ii. School-composed care plans, commercial laboratory reactivity results and homeopathic diagnoses will not be accepted</li><li>iii. Medical evidence will be used as the most accurate information</li><li>iv. Updated medical evidence must be provided in the instance that an existing medical diet is changed (e.g. additional or reduced requirements)</li></ul> |



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| 4.4        | Customers should return the Chartwells Medical Diet Request form & supporting medical evidence to the client office. Clients are then required to share the completed documentation with their Chartwells regional team for processing.   |
| 4.5        | On receipt by the dedicated Chartwells medical diet team, a medical diet menu will be prepared within 3-5 weeks if all conditions to proceed with a medical diet menu are met.  |
| 4.6        | <p>A medical diet will continue to be provided for future menu cycles by Chartwells until we receive confirmation in writing that it is no longer required.</p> <p>Clients must inform Chartwells about any leavers and confirm Chartwells' list of pupils requiring medical diets on a termly basis.</p>   |
| 4.7        | <p>The re-introduction of allergens into a customer's medical diet menu will only be accepted once updated medical evidence has been received by Chartwells.</p> <p>Chartwells will not be responsible for the gradual re-introduction of allergens (for example the re-introduction of milk using the 'milk ladder') or the provision of allergens in moderation or in different forms.</p>  |
| 4.8        | Medical diet requests received within 6 weeks of the end date of a menu will be processed for the new menu only. During the interim period, food may be provided as per point 3.10  |
| 4.9        | The client is responsible for ensuring that the customer receives a copy of any medical diet menu prepared by Chartwells and understands the menu, including in the event of learning or language difficulties. Chartwells will ensure the client are aware of any direct communication with customers regarding medical diet menus.  |
| 4.10       | <p>Customers will receive a copy of the medical diet menu and are required to notify any discrepancies immediately. Customers are also requested to return a completed medical diet menu sign-off form to the client admin office, who will forward it onto Chartwells, prior to the menu start date.</p> <p>Please note, however, that if Chartwells is not notified of any discrepancies by the stated menu start date, this will signify acceptance of the medical diet menu by the customer and it will proceed to offer the medical diet menu to the customer on the start date.</p> <p>The client is required to ensure that menu sign-off forms are received from all customers and that discrepancies are notified immediately.</p> |
| <b>5.0</b> | <b>ALLERGEN &amp; NUTRITION INFORMATION FOR CUSTOMERS</b>   |
| 5.1        | Allergen reports declaring the presence of the 14 mandatory FIR allergens are available for all Chartwells recipes on current menus. Customers and clients wishing to review these should ask the kitchen team or request them from their local Chartwells contact.   |
| 5.2        | Where suppliers declare that an ingredient 'may contain' an allergen, Chartwells will consider this as the same risk as a 'contain' warning and will remove the allergen from all implicated medical diet menus.  |

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| 5.3        | Chartwells will continually work with our suppliers to secure clear ingredient labelling and appropriate allergen declarations.   |
| 5.4        | Chartwells kitchens store medical diet menus in their medical diet folder on site.  |
| 5.5        | <p>Nutrient counts are available for current menus to enable customers to manage their nutritional intake, if required due to a medical condition. Chartwells nutrient counts will include the following information for each dish/menu item:</p> <ul style="list-style-type: none"> <li>i. Portion size (g)</li> <li>ii. Carbohydrate, Fat, Protein, Sodium &amp; Calorie content per portion</li> <li>iii. Carbohydrate, Fat, Protein, Sodium &amp; Calorie content per 100g</li> </ul> <p><i>Please Note: Chartwells use the nutrition analytics tool, Saffron, to provide nutritional data for our recipes. Saffron is used widely across the food industry and draws upon data from the McCance &amp; Widdowson's database (Public Health England's nutrition information data set). Nutritional information will be based upon average servings of each ingredient and therefore should be regarded as the closest possible estimated figures. Nutrient counts remain subject to change due to ingredient or processing alterations for any given recipe.</i></p> |
| 5.6        | <p>Customers wishing to consult the nutrient counts do not need to complete a medical diet request and should request a copy of the nutrient counts from their local Chartwells contact. More information about Chartwells nutrient counts can be accessed online here: <a href="https://loveschoolmeals.co.uk/medical-diets">https://loveschoolmeals.co.uk/medical-diets</a></p> <p><i>Please note: Calorie information is not available online. Customers requiring calorie information for the management of a medical diet should request this from their local Chartwells contact.</i></p>   |
| 5.7        | Specific medical diet requests for controlling the micronutrient (vitamin and mineral), food additive, food processing aid, colouring, thickener, stabiliser, gelling agent, raising agent, yeast, or preservative content of Chartwells menus cannot be accommodated. Information about Chartwells approved and banned food additives can be found in the Chartwells Food Additives Policy.  |
| <b>6.0</b> | <b>IDENTIFICATION OF CUSTOMERS WITH MEDICAL DIETS</b>   |
| 6.1        | <p>All clients with pupils following a Chartwells medical diet menu must have a system in place for the identification of the pupils at food service points.</p> <p>Chartwells clients must use Chartwells medical diet lanyards for such identification, UNLESS an alternative and established client system for identification of all relevant pupils, is approved by all parties as being functional for the circumstances, such approval being required prior to the use of the system for the provision of medical diets.</p>  |
| 6.2        | Operation of the medical diet lanyard system, where used, must be documented by both the client and Chartwells on the Lanyard Identification System Agreement Form and stored in the Chartwells Medical Diets folder on site.   |
| 6.3        | If an alternative identification system is agreed by both the client and Chartwells, this must be documented on the Medical Diet Identification System Form and stored in the Chartwells Medical Diet folder on site.   |

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| 6.4   | The client will be responsible for ensuring that lanyards are properly distributed to and worn by customers which are following a medical diet menu, or where an alternative identification system is agreed, shall be responsible for identifying the relevant customers in accordance with such system.   |
| 6.5   | Where possible, it is highly recommended that customers following a Chartwells medical diet are served at a separate service point designated for medical diets.  |
| 6.6   | Pupils with pending medical diet menus (for example, whilst the medical diet request and preparation process is underway) who are receiving interim food provision from Chartwells, as per point 3.10, should be enrolled temporarily into the approved medical diet identification system (lanyards or approved alternative).  |
| 6.7   | <p>Chartwells will also operate a medical diet identification poster system ('Hello my name is...' posters) behind the service counter, with photographs of pupils following a medical diet menu. Clients are required to support customers and Chartwells in providing an up-to-date photo to aid this identification system on request and if no such photographs or details have been provided, the client must ensure that the correct medical diet is provided to each relevant customer.</p> <p>This system is in line with GDPR. Please refer to the Compass Group Privacy policy for further information (<a href="https://www.compass-group.co.uk/about/privacy-policy">https://www.compass-group.co.uk/about/privacy-policy</a>).</p> |
| 6.8   | Where pupil photos are used as part of a medical diet identification system (on lanyards, 'Hello my name is...' posters or within an agreed alternative system) these must be up-to-date, clear passport style images. Clients are required to support Chartwells to obtain such photos and to ensure updated photos are provided annually at a minimum.  |
| <b>7.0 INGREDIENT &amp; ALLERGEN MANAGEMENT</b> |   |
| 7.1   | <p>Chartwells kitchens will implement all reasonable controls for cross-contamination however it is not appropriate for dishes produced in school kitchens to be considered by any party as 'free from' allergens.</p> <p>Chartwells do not endorse a completely allergen free environment. This advice is consistent with external governing bodies and allergy charities who state that a completely allergen free environment is artificial and inconsistent with the real world.</p>  |
| 7.2   | Only ingredients and products purchased in accordance with Chartwells supply chain standards from our partnered suppliers will be used in Chartwells kitchens. Ingredients brought in from home by customers must not be used or stored in Chartwells facilities.   |
| 7.3   | All Chartwells staff receive Health & Safety training covering food safety and allergen awareness to a level appropriate for their role. Additional training is continually provided at Chartwells Allergy Academies, regional team events and through the Chartwells Allergen Awareness Training.  |
| 7.4   | If medically prescribed ingredients are required for pupils to eat safely with Chartwells, the customer must sign the Chartwells indemnity form for 'food brought into school from home'. The use of these ingredients will be reviewed on a case by case basis and medical evidence  |

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|            | <p>must be provided. Chartwells will assess the risk of cross-contamination from such ingredients and clients are required to support customers and Chartwells if required on the basis of such risks, by providing an alternative facility for use and storage of such ingredients.</p>  |
| 7.5        | <p><i>State schools &amp; academies only:</i></p> <p>Chartwells will not use any nuts as ingredients or products stating 'contains nuts' as an ingredient. Chartwells may use products with a 'may contain' declaration for nuts as long as no nuts are present in the ingredients. Where Chartwells have agreed with clients to operate a 'no nuts' site, no products with a 'may contain' declaration for nuts will be used on the menu.</p>  |
| <b>8.0</b> | <b>IN CASE OF EMERGENCY &amp; HEALTH AND SAFETY</b>   |
| 8.1        | <p>Clients should ensure care plans are in place for the management of medical diets on their premises and should share any such care plans and updates to procedure with Chartwells kitchen team.</p>  |
| 8.2        | <p>Clients must have an emergency plan in place for the administration of Epipens (adrenaline auto injectors). This plan must be shared with Chartwells kitchen team and Epipens must only be applied by authorised persons as agreed in the emergency plan.</p>  |
| 8.3        | <p>Chartwells will operate internal Health and Safety audits and 'Safety Walks', conducted by Health and Safety managers or trained operators, to ensure compliance to all applicable allergen policies and procedures. Internal Health and Safety audits are completed using Chartwells All Incident Reporting system (AIR). Any identified non-compliances will be acted upon within the shortest, practical timescale and all audit reports will be retained and analysed at Health &amp; Safety management review meetings.</p> <p>Supplementary internal nutrition audits may also be conducted, as required, by trained Chartwells nutritionists, using a mobile reporting tool, to ensure compliance to menu nutrition and medical diet provision standards.</p> <p>Additional independent external audits will be conducted by bodies accredited by UKAS to an agreed regular programme. Chartwells external audits are conducted by the ISOQAR certification body.</p> |
| 8.4        | <p>In the case of an incident or near miss, Chartwells Unit Managers will report to their Line Manager and document the incident on the Accident and Incident Reporting system (AIR). Chartwells team of Health and Safety Manager's will then provide support and give suitable advice and guidance.</p> <p>All incidents are reported as soon as possible to allow a thorough investigation to take place and establish the root cause.</p> <p>Following any incident, processes will be reviewed and the Health and Safety and Nutrition Team will support with ongoing training requirements as required. Lessons learnt will be circulated to the business sector to reduce the risk of further similar incidents occurring.</p>   |



## **APPENDIX 1 - RISK ASSESSMENT**

LACA (Lead Association for Catering in Education) document pending public publication