

Three Counties Academy Trust



Whole-School Food Policy

#CU4

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Policy lifespan: 3 years. Subject to annual compliance check. Next full review 25th June 2029.

Version history

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Policy Abbreviations and Acronyms

AIP	Alliance in Partnership
CEO	Chief Executive Officer
CFO	Chief Financial Officer
DfE	Department for Education
FSM	Free School Meals
HACCP	Hazard Analysis Critical Control Point
LA	Local Authority
PE	Physical Education
PPE	Personal Protective Equipment
PSHE	Personal, Social and Health Education
TCAT	Three Counties Academy Trust

NB. Where the term “parent” or “parents” is used this includes those who act as carers or have parental responsibility.

Statement of intent

At Three Counties Academy Trust (TCAT), we understand that what pupils eat and drink at our schools is important. We aim to teach pupils about food and nutrition through the curriculum and reflect these principles in each school's food menu and cooking provisions.

We acknowledge the important connection between a healthy diet and a pupil's ability to learn effectively and achieve high standards in school. We also acknowledge that we can play a key role in supporting the wider community to adopt a positive attitude to a healthy lifestyle.

As part of our healthy eating and living campaign, our catering will uphold the highest standards of quality, nutrition, and cleanliness, adhering, without exception, to the food standards and legal obligations. As such, this policy has been implemented to allow us to provide food in a safe and hygienic manner.

Stoke Prior Primary School and Lugwardine Primary Academy catering services are provided by Alliance in Partnership (AIP), We provide catering services to other TCAT schools through a third-party provider, Black Pepper School Lunches, who are not employed by TCAT but operate out of TCAT premises at the Queen Elizabeth High School kitchens.

Trustee, Local Governor and Staff Summary

Strategic responsibilities

- Ensure food provision across all schools meets statutory food standards and legal requirements
- Promote a whole-school approach to healthy eating and wellbeing
- Oversee arrangements to ensure equitable access to meals, including for pupils entitled to FSM

Provision and access

- Ensure all pupils can access at least one hot meal each day except in exceptional circumstances
- Ensure drinking water is available free of charge at all times
- Ensure appropriate facilities, supervision, and environment for safe and social eating
- Ensure provision of milk and healthy food options in line with standards

Compliance and assurance

- Monitor compliance with School Food Standards and associated legislation
- Ensure allergen information and ingredient labelling is accurate and available
- Ensure catering providers meet hygiene, safety and contractual standards
- Ensure regular inspection, review and reporting on catering provision

Leadership and operational oversight

- CEO/CFO oversee food safety, hygiene training, and contractor assurance
- Headteachers and Heads of School lead whole-school healthy eating strategy
- Senior leaders complete risk assessments and monitor implementation

Catering and implementation

- Catering providers plan menus in line with School Food Standards
- Ensure high standards of hygiene, cleanliness, and food safety

- Maintain food safety records, temperature checks, and cleaning schedules
- Ensure appropriate PPE is available and used

Health and wellbeing

- Promote healthy eating through curriculum, assemblies, and wider school activity
- Encourage balanced diets, physical activity, and positive food culture
- Support pupils in developing lifelong healthy eating habits

Monitoring and review

- Regularly review food provision, hygiene records, and compliance
- Respond to inspection outcomes and implement required actions promptly
- Ensure policy is reviewed, updated, and communicated across TCAT

Parent Summary

Our approach to food and health

- We believe that what children eat and drink at school plays a vital role in their health, wellbeing, and ability to learn
- All schools aim to promote healthy eating through lessons, assemblies, and the wider school environment
- Menus and food provision are designed to support a balanced diet and positive lifelong habits

School meals and provision

- A range of healthy meals are provided each day, including at least one hot option except in exceptional circumstances
- Menus are planned to meet national School Food Standards
- Fresh drinking water is available to all pupils throughout the day
- Milk and healthy options are provided in line with age and entitlement requirements
- Food services are delivered by approved catering providers working on behalf of TCAT

Food quality and standards

- Meals include a balance of food groups such as starchy foods, fruit and vegetables, and protein sources
- There are clear limits on foods high in fat, sugar and salt
- Portion sizes and menu planning follow national guidance to meet pupils' nutritional needs
- Special diets, including vegetarian and other dietary requirements, are catered for where possible

Food safety and hygiene

- Strict food hygiene and safety standards are followed at all times
- All catering staff are trained and regularly updated on food safety and allergen awareness
- Food preparation areas and kitchens are cleaned and maintained to a high standard
- Regular checks, inspections and records ensure compliance with food safety regulations

Allergens and dietary needs

- Allergen information is clearly provided for all food, including pre-packaged items
- Parents should inform the school of any allergies or medical dietary requirements
- Staff are trained to respond appropriately to allergen-related enquiries and risks

Promoting healthy lifestyles

- Schools encourage pupils to make healthy food choices and understand nutrition
- Healthy eating is supported alongside physical activity and wellbeing initiatives
- Parents and pupils are encouraged to contribute feedback on menus and food provision

Eating environment and behaviour

- Pupils are encouraged to eat in a safe, calm and social environment
- Supervision is provided to ensure a positive lunchtime experience
- Expectations support safe eating practices, particularly with hot food and drinks

Monitoring and continuous improvement

- Food provision is regularly reviewed to ensure high standards are maintained
- Feedback from pupils and parents is considered where possible
- Any concerns raised will be addressed in line with school and TCAT procedures
- The policy is reviewed regularly to ensure it reflects current guidance and best practice

1. Legal framework

This policy has due regard to all relevant legislation including, but not limited to, the following:

- [The Requirements for School Food Regulations 2014](#)
- [The Food Information \(Amendment\) \(England\) Regulations 2019 \(Natasha's Law\)](#)
- [The Food Safety Act 1990](#)
- [The Food Safety \(General Food Hygiene\) Regulations 1995 \(as amended\)](#)
- [The School Standards and Framework Act 1998](#)
- [The Products Containing Meat etc. \(England\) Regulations 2014](#)
- [DfE 'School food in England'](#)
- [The School Food Plan 'School Food Standards: A practical guide'](#)

Where legislation has been passed or updated during the shelf life of this policy, we will always apply the latest version available irrespective of the version quoted here.

This policy operates in conjunction with the following policies:

- Healthy Eating and Drinking Policy (CU5)
- Health and Safety Policy (HS1)
- First-Aid Policy (HS2)
- Allergen and Anaphylaxis Policy (SG17)
- Infection Control Policy (SG32)

Central TCAT policies have the policy number identified, e.g. "SG1". Where no policy number is identified this indicates the policy is a school specific policy available from an individual TCAT school's website.

2. Roles and responsibilities

The Trust Board is responsible for:

- The provision of food for each TCAT school – ensuring pupils entitled to FSM and pupils who have requested school meals receive them
- Working with external partners to ensure the agreed food provision adheres to the food standards
- Ensuring that, where possible, all pupils are able to eat one hot meal a day
- Ensuring that drinking water is provided free of charge at all times
- Providing free-to-use facilities to eat food, including accommodation, furniture, and supervision, so pupils can eat their food in a safe and social environment
- Ensuring that lower-fat milk or lactose-reduced milk is available at least once a day during school hours in our primary settings
- Ensuring that milk is provided free of charge to infants and pupils entitled to FSM
- Ensuring a free piece of fruit or vegetable is provided outside of school lunch hours for pupils between four and six years old through the School Fruit and Vegetable Scheme
- Ensuring that there is coordination across all catering services sought by TCAT, to guarantee compliance with school food standards, where such services are not provided by Black Pepper School Lunches
- Ensuring that all pre-packaged foods available at each TCAT school provide full ingredient lists and allergen labelling

The CEO and/or CFO is responsible for:

- Organising food hygiene training, including on allergens, for all in-house kitchen staff, and refresher training annually (duty discharged to Black Pepper School Lunches and AIP as the employer)
- Ensuring any external catering companies have an up-to-date food hygiene certificate
- Ensuring facilities are cleaned to the highest standards, conducting inspections where appropriate
- Ensuring the kitchen staff have completed and keep an up-to-date food hygiene plan

Executive Headteachers/Headteachers/Heads of School are responsible for:

- Discussing with the Chef/Head Cook the meal plans for the term, including where food is sourced from and whether there are any healthier alternatives

- Creating a whole-school healthy eating strategy that is made in collaboration with the Head Cook
- Completing relevant risk assessments

The Head Cook, AIP and/or Black Pepper School Lunches Proprietor is responsible for:

- Providing the CFO with a copy of their food hygiene certificate upon request
- Ensuring a food hygiene record is kept, to demonstrate how Black Pepper School Lunches/AIP acting for TCAT ensures all food and its preparation methods are safe, and that this is reviewed on a half-termly basis
- Checking the temperatures of food storage areas at the start and end of each day to ensure they are running at the correct temperature and documenting these in the food hygiene record
- Ensuring PPE is undamaged and that there is enough PPE for each member of kitchen staff
- Rotating stock to ensure food with a shorter shelf life is used and consumed before food with a longer shelf life
- Withdrawing stock that has gone past its 'use by' date or is not safe to eat
- Ensuring a cleaning schedule is maintained and reviewed on a termly basis
- Ensuring high standards of personal hygiene are maintained at all times
- Ensuring the food served to pupils is nutritious and provides them with a healthy balanced diet in line with TCAT's healthy eating strategy
- Checking that all pre-packaged food provides full ingredient lists and allergen labelling before it is made available to staff, visitors, and pupils

3. Current food-based standards for school lunches

TCAT is committed to providing pupils with a healthy balanced diet, in line with the School Food Plan's 'School Food Standards: A practical guide. TCAT will require Black Pepper School Lunches/AIP to use the following standards when planning meals and adapting the healthy eating strategy.

All foods that are pre-packed for direct sale (PPDS) will be labelled in line with the requirements of The Food Information (Amendment) (England) Regulations 2019, known as Natasha's Law.

- Labels will clearly display:
- The name of the food.
- A full ingredients list

- All ingredients present in the product.
- Any of the 14 legally recognised allergens, clearly emphasised within the ingredients list in accordance with current food information legislation

TCAT schools will insist that PPDS food is prepared, packaged and labelled using accurate, up-to-date ingredient information by our caterers. Where recipes or ingredients change, labels will be updated before products are made available for sale or consumption.

Staff responsible for preparing, packaging or selling PPDS food employed by our catering providers will be required to have received appropriate training to ensure compliance with food safety legislation, allergen management procedures and the requirements of Natasha's Law. Appropriate quality assurance arrangements will be in place to verify that allergen information remains accurate and that labelling is applied consistently.

Whilst every reasonable precaution will be taken to ensure the accuracy of food labelling, pupils, parents, carers, staff and visitors with food allergies or intolerances are encouraged to discuss their dietary requirements with the school and catering providers before consuming food prepared or sold on the premises. Where there is any uncertainty regarding ingredients or allergens, the food should not be consumed until clarification has been obtained from an authorised member of staff.

Starchy foods:

- One or more portions of bread, pasta, noodles, rice, potatoes, sweet potatoes, yams, millet, or cornmeal will be provided every day
- Three or more different portions of bread, pasta, noodles, rice, potatoes, sweet potatoes, yams, millet or cornmeal will be provided each week – one or more of these will be wholegrain
- A type of bread with no added fat or oil will be available every day
- Starchy food cooked in fat or oil will only be provided twice a week maximum across a school day

Fruit and vegetables:

- One or more portions of vegetables (all types) or salad will be available every day
- One or more portions of fruit (all types) will be available every day
- Three or more different types of vegetables and three or more different types of fruit will be provided each week
- Some fruit-based dessert with a content of at least 50 percent fruit, measured by the volume of raw ingredients, will be provided two or more times each week

Meat, fish, eggs, and other non-dairy sources of protein:

- A portion of meat, fish, eggs, nuts, pulses and beans (not including green beans), or other non-dairy sources of protein, will be provided every day
- A portion of meat or poultry will be provided on three or more days every week
- Oily fish will be provided once or more every three weeks
- For vegetarians and vegans, a portion of non-dairy sources of protein will be provided on three or more days every week
- For our primary provision, a meat or poultry product, e.g., chicken nuggets, will be served no more than once a week
- Within our secondary provision, a meat or poultry product, e.g. chicken nuggets, will be served no more than twice a week
- Meat containing any prohibited parts of the carcass, e.g. stomach, will not be provided, in accordance with The Products Containing Meat etc (England) Regulations
- No economy burgers will be provided, as defined in The Products Containing Meat etc. (England) Regulations 2014

Milk and dairy:

A portion of cheese, yoghurt, fromage frais or custard will be provided every day.

Lower fat milk will be available for drinking at least once a day during school hours, e.g., not including breakfast and after-school clubs.

Food high in fat, sugar, and salt:

- Savoury crackers or breadsticks which are served with fruit and vegetables, or milk and dairy may be provided as part of school lunches
- Snacks that may be provided will include no added salt, sugar or fat and are limited to nuts, seeds, vegetables and fruit
- TCAT will not provide sachets of salt to be added to meals on top of the salts already included within cooking
- Condiments will be limited to 10-gram sachets or one teaspoonful – pupils will be limited to one sachet per type of sauce
- Confectionary, including chocolate and chocolate-covered products, of any kind will not be served, even as part of a dessert
- Desserts, cakes, and biscuits not containing any confectionary may be served as part of a lunch meal
- No more than two portions of food containing pastry, and food that is deep fried, bread-crumbed or battered will be served a week

Healthier drink options:

Drink options TCAT will offer are:

- Still or carbonated plain water
- Lower-fat or lactose-reduced milk
- Fruit or vegetable juice (no more than 150mls)
- Unsweetened combinations of fruit or vegetable juice with still or carbonated plain water (no more than 150mls fruit or vegetable juice and no more than 330mls total)
- Soya, rice, oat drinks and plain fermented milk, e.g. yoghurt, drinks
- Coffee, tea, or hot chocolate

4. Portion sizes and food groups

Black Pepper School Lunches/AIP, acting for TCAT, will use the following portion sizes and food groups for school lunches, in accordance with the school food standards.

Starchy food:

Food type	Raw, dried, or cooked	Primary-aged pupils (aged 4-10)	Secondary-aged pupils (aged 11-18)
Bread	N/A	(50-70g) <ul style="list-style-type: none">• 1-2 slices of medium bread• 1 small roll	(80-100g) <ul style="list-style-type: none">• 2 thick slices of bread• 1 large roll or sub roll• 1 large bagel• 1 large pitta• 1 12-inch wrap

		<ul style="list-style-type: none"> • 1 small or ½ large bagel • 1 small pitta • 2 6-inch wraps • 1 10-inch wrap 	
Potatoes or sweet potatoes	Raw	120-170g	200-250g
Jacket and baked potatoes	Raw	200-280g	330-410g
Other starchy root vegetables, e.g., yam and plantain	Raw	100-150g	150-200g
Pasta and noodles	Dried	45-65g	65-80g
Rice	Dried	33-55g	55-65g
Other grains, e.g., cornmeal and couscous	Dried	40-60g	60-70g
Potatoes cooked in oil or fat	Raw	70-100g	120-150g
Garlic bread	N/A	20g (1 slice)	40g (2 slices)

Fruit and vegetables

Food type	Raw, dried, or cooked	Primary-aged pupils (aged 4-10)	Secondary-aged pupils (aged 11-18)
Vegetables or mixed salad	Raw	40-60g	80g
Vegetables including peas, green beans, sweetcorn, carrots, mixed vegetables, cauliflower, broccoli, swede, turnip, leek, Brussels sprouts, cabbage, spinach, and spring greens	Cooked	40-60g (1-2 tablespoons)	80g (2-3 tablespoons)
Pulses, including lentils, kidney beans, chickpeas	Dried	15-20g	30g
	Cooked	40-60g (1-2 tablespoons)	80g (3 tablespoons)
Baked beans in tomato sauce	Cooked	50-70g (1-2 tablespoons)	90-100g (3 tablespoons)
Vegetable-based soup	Cooked	200-250g	250-300g
Large-size fruit, e.g., apples, pears, bananas, peaches	Raw	75-100g (1 small sized fruit with skin)	100-150g (1 medium sized fruit with skin)
Medium-size fruit, e.g. satsumas, plums, apricots, tangerines, kiwis	Raw	50-100g (1fruit with skin)	80-100g (1-2 fruits with skin)
Small fruit, e.g., strawberries, raspberries, grapes	Raw	40-60g (10-15 fruits)	80g (15-20 fruits)
Dried fruit, e.g., raisins, sultanas, apricots	Dried	15-30g (½-1 tablespoon)	25-30g (1 tablespoon)

Fruit salad, fruit tinned in juice and stewed fruit	Raw/cooked	65-100g (2-3 tablespoons)	130g (3-4 tablespoons)
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Meat, fish, eggs, beans, and other non-dairy sources of protein:

Food type	Raw, dried, or cooked	Primary-aged pupils (aged 4-10)	Secondary-aged pupils (aged 11-18)
Roast red meat including beef, lamb, pork, veal, venison and goat	Raw	50-80g	80-95g
Roast poultry including chicken, turkey, duck, and other dishes made from these products	Raw	60-85g	85-125g
Red meat or poultry in dishes, e.g., casseroles and pies	Raw	50-75g	75-90g
Meat-based soup	Cooked	200-250g	250-300g
White fish, e.g., pollock, haddock and cod, which is cooked alone or in a dish	Raw	60-90g	90-125g
Oily fish, e.g., salmon, sardines, and mackerel	Raw	55-80g	80-110g
Fish or shellfish, e.g. tuna, salmon, mackerel and prawns, which is served in a salad, baked potato or sandwich	Cooked	50-70g	70-100g
Breaded or battered fish, e.g., fish fingers, fish cakes	Cooked	55-80g	85-95g
Egg served in a salad, baked potato or sandwich	Cooked	1 egg	1-2 eggs
Meat alternatives made from soya beans, e.g., tofu	Cooked	50-70g	70-100g

Pulses, e.g., beans, chickpeas, lentils	Raw	20-25g	40-45g
	Cooked	50-60g (1-2 heaped tablespoons)	100-120g (2-3 heaped tablespoons)
Vegetarian sausages, burgers, and nut cutlets	Raw/cooked	50-70g	70-100g
Sausages made from beef, lamb, or pork	Raw	50-75g (1 sausage)	75-90g (1-2 sausages)
Burgers	Raw	55-80g	80-100g
Scotch pies, bridies, sausage rolls, etc.	Cooked	80g	110g
Breaded or battered shaped chicken and turkey products, e.g., nuggets	Cooked	50-70g	70-100g

Milk and dairy:

Food type	Primary-aged pupils (aged 4-10)	Secondary-aged pupils (aged 11-18)
Lower-fat drinking milk	150-200mls	200-250mls
Milk puddings and whips made with milk	100-120g	120-150g
Custard made with milk	80-100g	100-120g
Yoghurts	80-120g	120-150g
Cheese	20-30g	30-40g

Foods high in fat, sugar, and salt:

Food type	Primary-aged pupils (aged 4-10)	Secondary-aged pupils (aged 11-18)
Fruit pies, sponge puddings or crumbles	80-100g	100-120g
Fruit jelly (portion size excludes fruit)	80-100g	100-120g
Cakes, tray bakes, muffins, scones, doughnuts	40-50g	50-60g
Biscuits and flapjack	25-30g	30-40g
Ice cream	60-80g	100g
Pizza base	50-70g	80-100g
Gravy	20-30g (1 tablespoon)	40-50g (2 tablespoons)
Savoury crackers, bread sticks	10-15g (1-2 crackers)	15-30g (2-3 crackers)
Condiments	No more than 10g	No more than 10g

Healthier drinks:

Drink type	Primary-aged pupils (aged 4-10)	Secondary-aged pupils (aged 11-18)
Fruit or vegetable juice	150mls	150mls
Drinking milk	150-200mls	200-250mls

Combination drinks, e.g., fruit juice, flavoured milk	330mls	330mls
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Cereals offered as part of breakfast clubs will be high in fibre with low to medium sugar and low salt.

5. Exemptions to the school food regulations

The school food standards do not apply to food provided:

- At parties or celebrations marking religious or cultural occasions
- At fundraising events
- As rewards for achievements, good behaviour, or effort
- For using in teaching food preparation and cookery skills, including where the food prepared is served to pupils as part of a school lunch
- On an occasional basis by parents or pupils

Within our Nursery provisions, there is a reduced set of standards for food served at lunch time and whole milk can be served as per section 3 of this policy.

With respect to Queen Elizabeth High School and Lugwardine Primary Academy only, incorporated in 2011 and 2012 respectively, Three Counties Academy Trust is not obliged to adhere to these regulations but will apply them voluntarily.

6. Healthy eating statement

With our catering partners, TCAT will use healthier cooking methods to contribute to healthy eating, such as the following:

- Using less fat in cooking
- Baking foods rather than frying them
- Where fats are used, increasing the use of healthier varieties
- Reducing the use of sugar in recipes
- Avoiding using additional salt in cooking processes

- Increasing the use of food items containing high amounts of fibre

All menus will be developed by Black Pepper School Lunches and AIP in accordance with the standards set out in the School Food Regulations 2014 and guidance from The School Food Plan in 'School Food Standards: A practical guide for schools, their cooks, and caterers', which are outlined in the Whole-school Food Policy.

Each school will also recognise and adhere to the School Food Regulations 2014 requirements for food and drink other than lunch that are:

- Provided to pupils on school premises up to 6pm, including:
 - Breakfast clubs
 - Tuck shops
 - Mid-morning break
 - Vending and after school clubs
- Provided before 6pm on school trips where the trip is for at least seven days

Each TCAT school will encourage pupils to adopt healthy lifestyles, both through a nutritional diet and regular exercise, and during assemblies, PE lessons and PSHE.

Each TCAT school will adopt a healthy eating strategy and embed its principles throughout the curriculum.

7. Catering service standards

Menus and prices (where applicable) will be clearly displayed and will contain nutritional information. Additionally, menus will adhere to statutory nutritional standards and will reflect parents' and pupils' preferences, cultural, religious, and special dietary needs. Parents' and pupils' feedback will be encouraged and, where possible, changes made to increase their satisfaction.

The cleanliness of the kitchen and serving areas will be kept to the highest standards. Food preparation and serving areas will be cleaned before, during and after preparation and cooking, in accordance with The Food Safety (General Food Hygiene) Regulations 1995 (as amended).

Kitchen staff will:

- Be suitably trained and will have an appropriate recognised qualification in food hygiene

- Be clean and tidy in appearance and will be courteous to all pupils, staff and parents
- Adhere to the service times, start and finish, agreed by the Headteacher/Head of School

Service times will be displayed, and the service will always commence on time. Pupils entitled to free school meals will be treated with sensitivity.

8. Purchasing food

All food items are purchased from reputable suppliers to ensure compliance with government buying standards. Purchase only occurs at our secondary setting Queen Elizabeth High School. Black Pepper School Lunches maintains a record of their suppliers.

TCAT through Black Pepper School Lunches, places stringent contractual demands on catering suppliers in support of legislative requirements and favourable trade operating practices. All food products and ingredients are checked for acceptability, i.e., nutritional specifications, genetically modified organism requirements and allergen ingredients.

All pre-packaged foods supplied will clearly display the following information on the packaging:

- Name of the food
- Full ingredients list, with allergenic ingredients emphasised, e.g. in bold, italics or a different colour

All products identified as acceptable for inclusion in our range are compared for ingredient and nutritional value against set specification criteria before being incorporated into the menus.

Menus will, as much as reasonably practicable, reflect the natural growing or production period for the UK to assist pupils in learning about food production and seasons.

Any fish products served will be sustainably sourced to promote the importance of sustainable fishing.

TCAT continues to place emphasis on consumer response to new products; throughout this process, both TCAT and Black Pepper School Lunches/AIP, will liaise and consult with the school community, including parents, to ensure acceptable quality.

9. Food and drink safety

Food will only be consumed in the canteen, on the playground (secondary provision only) and in classrooms with teachers' permission. Pupils will be instructed not to run when they are eating. Drinking water will be available from the drinking fountain and pupils will be permitted to refill water bottles throughout the day.

Staff will eat all hot food in the staff room away from pupils. If members of staff are drinking hot drinks, they will keep them out of pupils' reach. Hot drinks will be kept in insulated and anti-spill flasks with lids, e.g., travel mugs except where these are used in staff only areas. Staff are permitted to have hot drinks in the classroom; however, they will place them at the back of a desk to minimise the risk of spillage. Staff on lunch duty can have hot drinks but they must adhere to the above points.

Hot drinks will be served in an insulated flask with a lid. Pupils will only be permitted to have hot drinks in the canteen. Pupils will not be permitted to walk around the premises with hot drinks. When pupils have hot drinks, staff will warn them that the cups might be hot. Staff will remind pupils to ensure their drinks are cool enough before drinking them.

Electrical equipment, such as kettles, toasters, will be turned off when they are not in use. They will not be kept in classrooms, except in food technology lessons. If pupils are in a food technology lesson (or similar), they will be supervised by a member of staff, and the staff member will demonstrate how to use the equipment. Appropriate PPE will be available for pupils who are handling hot food, drinks or equipment, e.g. oven gloves.

Pupils will not have access to the kitchen without supervision from a member of staff. Pupils will not be permitted to make their own drinks. When eating hot food, pupils will be instructed to use cutlery where possible and to ensure their food is cool enough before eating it.

First aid kits are located in defined locations within each school as per TCAT's First Aid Policy.

Headteachers/Heads of School will conduct a risk assessment for hot food and drinks, and staff will receive appropriate first aid training to handle burns etc.

10. Kitchen safety

Kitchen staff will have a list of all allergens and will avoid using them within the menu.

The 14 allergens which are required to be declared are:

- Celery
- Cereals containing gluten, e.g., barley and oats
- Crustaceans, e.g., prawns
- Eggs
- Fish
- Lupin
- Milk
- Molluscs
- Mustard
- Peanuts
- Sesame
- Soybeans
- Sulphur dioxide and sulphite (where they are at a concentration of more than ten parts per million)
- Tree nuts, e.g., almonds, hazelnuts, walnuts

Where meals include allergens or traces of allergens, Black Pepper School Lunches/AIP will use labels to denote which of the 14 allergens are or may be present. Pre-packaged food sold at a TCAT school, whether made on-site or sourced from a supplier, will include a full ingredients list, with allergenic ingredients emphasised, e.g. in bold, italics or a different colour.

All kitchen staff will be suitably trained in allergy awareness, including how to respond to an allergy sufferer's questions. Training will be assessed regularly to ensure staff are competent and confident in dealing with allergens. Where staff are made aware of updates or ingredient changes by suppliers, this will be acted upon immediately. The Proprietors of Black Pepper School Lunches/AIP will work with the CFO in ensuring mandated training is conducted and maintained.

Black Pepper School Lunches/AIP acting for TCAT, will use reputable suppliers to source their produce, ensuring the quality of the food served is the same as they have promised to consumers. Black Pepper School Lunches/AIP will not be misleading with the food that they serve, and the labelling will accurately represent what is being eaten. A record will be kept of where the produce comes from, and Black Pepper School

Lunches/AIP will be prepared to produce this record on demand by an environmental health officer or any member of the TCAT Executive Leadership Team.

Black Pepper School Lunches/AIP staff will withdraw any produce that has gone past its 'use by' date. All kitchen staff will be trained in food safety as part of their food hygiene training. Staff will be aware of all the harmful bacteria that could cause serious illness if not treated and removed properly from food sources. In events where suppliers recall produce due to reports of harmful levels of bacteria in stock, staff will remove all traces of the product from the school and ensure the CFO is notified. Parents will be informed of the outbreak, in line with the TCAT's Infection Control Policy.

Kitchen staff will be aware of the 'danger zone' where microbial growth is stimulated – this is between the temperatures of 8°C and 63°C; kitchen staff will cook food until its core temperature has reached 70°C and remains that temperature for two minutes to minimise the risk of harmful bacteria being present in food.

Kitchen staff will have an in-depth knowledge of the risks of cross contamination. Colour-coded chopping boards and corresponding knives will be used for food preparation. Black Pepper School Lunches/AIP uses the following colour-coded board and knife system:

Colour of chopping board and knife	Food group
Red	Raw meat
Yellow	Cooked meat/fish
Green	Salads and fruit
White	Bakery and dairy
Brown	Vegetables
Blue	Raw fish

11. Food hygiene

Black Pepper School Lunches/AIP will keep an up-to-date food hygiene plan, in line with the Hazard Analysis Critical Control Point (HACCP) principles.

Black Pepper School Lunches and Food Technology teachers will receive food hygiene training as part of their induction, with at least one member of staff holding a formal food hygiene certificate which will be kept up to date. All kitchen staff will partake in annual food hygiene refresher training.

In line with food safety and hygiene regulations, a food hygiene record will be kept, demonstrating what the Black Pepper School Lunches/AIP and Three Counties Academy Trust has done to ensure all food and food preparation areas are safe and how this compares with the proposed food hygiene plan. This record will be maintained by the Chef/Head Cook or Proprietors of Black Pepper School Lunches/AIP and entries will be completed on a daily basis.

For each day of the week, the food hygiene record will include space to record the following:

- The date
- The completion of the opening and closing checks, as outlined in the present section of this policy
- The completion of the day's cleaning tasks, with reference to the cleaning schedule
- Details of any hygiene-related incidents that occurred during the day
- Additional checks that may have been conducted, e.g., pest control checks that take place on a less frequent basis
- A signature from the Chef/Head Cook or designated member of staff that has completed the day's entry

The food hygiene record will also include the following:

- List of suppliers
- Kitchen staff training record
- Food temperature monitoring records
- Fridge and freezer temperature monitoring records
- Hygiene inspection checklist

- Monthly reviews

At each half-termly review, the Chef/Head Cook will assess the food hygiene record to identify any persistent problems from that last period. If problems are identified, these will be recorded along with decisions on how to handle them, e.g., providing staff with additional training.

At the beginning of the school day, the following checks will be conducted:

- All fridges, freezers and chilled display equipment are working properly, and fridges are running below 5°C, chill cabinets below 8°C, and freezers at -5°C
- All other equipment, e.g., ovens, is working properly
- Staff are fit for work, not presenting any signs of illness, and wearing clean clothes
- Food preparation areas are clean and disinfected
- There are plenty of handwashing and cleaning materials available, e.g. soap and paper towels

At the end of the school day, the following checks will be conducted:

- No food has been left out
- Fridges are running below 5°C, chill cabinets below 8°C, and freezers at -5°C
- Food that is past its 'use by' date has been thrown away
- Dirty clothes have been removed for cleaning and replaced with clean ones
- Food and cleaning waste has been removed, and new bags have been put into the bins

A cleaning schedule will be maintained and stored in the Chef/Head Cook's office. The cleaning schedule will outline:

- Items and equipment that need to be cleaned
- How frequently items and equipment need to be cleaned
- Who is responsible for cleaning items and when
- The precautions that must be taken when cleaning
- The methods of cleaning that will be used

Training will be provided to all Black Pepper School Lunches staff on how to use the cleaning schedule.

Kitchen staff will keep food preparation areas to the highest standard of cleanliness by doing the following:

- Cleaning before, during and after food preparation
- Keeping a well-stocked supply of cleaning materials
- Ensuring hand soaps and sanitisers are accessible and fully stocked
- Ensuring all chopping boards are stored in a stand and are dry before use
- Storing knives away from the reach of unauthorised personnel in a sanitised draw or stand
- Washing cleaning cloths and towels at the end of the day and drying them before reuse
- Storing cleaning cloths and towels in a sterile cupboard or draw
- Not leaving food products out at room temperature for longer than is necessary
- Storing any bags or personal belongings out of the kitchen to avoid foreign bodies entering the food preparation area

Black Pepper School Lunches staff will complete cleaning tasks as allocated and ensure these are marked as 'Complete' on the cleaning schedule. The cleaning schedule will be reviewed on a monthly basis by the Chef/Head Cook to ensure that cleaning tasks are being completed properly.

Food contact materials will come from reputable suppliers and will be safe for use by staff to package, store, prepare and cook food. For the purpose of this policy, food contact materials include:

- Packaging, e.g., cellophane wrap
- Food processing equipment, e.g., a food blender
- Cookware
- Work surfaces

TCAT recognises the importance of food hygiene and will accommodate any member of staff who wishes to complete an official food hygiene certificate as part of their CPD, where possible.

Black Pepper School Lunches staff, and staff involved in serving employed directly by TCAT, will wear suitable PPE when preparing food – the PPE will be free from tears, burns or holes. The following list indicates the suitable PPE TCAT may use:

- Full body aprons

- Hair/beard nets
- Latex gloves
- Shoe covers

Black Pepper School Lunches/AIP staff will be informed by the Chef/Head Cook on how to properly stock a fridge, including the following procedure:

- Raw meat stored on the bottom shelf
- Cooked meat on the middle shelf
- Fruit and vegetables on the top shelf

Where stock requires more than one fridge, raw and cooked meat will be stored separately.

Black Pepper School Lunches staff, and staff involved in serving employed directly by TCAT will have high standards of personal hygiene, including washing hands in the following circumstances:

- Before and after preparing raw meat
- Before and after preparing and cooking other food products
- After using the toilet
- After touching door handles, light switches, or phones.
- After coughing or sneezing

Black Pepper School Lunches/AIP staff will check the accuracy of their thermometers by using the boiling water test. For the purpose of this policy, the boiling water test involves submerging the thermometer in boiling water and checking that the temperature reads 100°C +/- 1 degree.

TCAT's food hygiene record, cleaning schedule and details of all hygiene and safety checks will be retained by Black Pepper School Lunches/AIP and copied to the CFO in line with the local environmental health department's requirements.

12. Environmental health inspections

The Chef/Head Cook will be the key contact for the environmental health officer from the LA – being responsible for implementing any recommendations made to them.

TCAT and/or Black Pepper School Lunches/AIP will record the following information in an environmental health logbook:

- Any identified hazards, e.g., a fridge running at 5°C or higher
- How hazards were avoided, removed, or reduced, e.g., turning the temperature of the fridge down
- How any problems are rectified, e.g., reviewing the fridge's temperature every 15 minutes
- How plans are checked for effectivity

The Chef/Head Cook will ensure all the necessary documentation is readily available for inspection for the environmental health officer, including their food hygiene plan and food hygiene record.

Each TCAT school will have their food hygiene rating sticker in a visible location within the dining area or kitchen. If a TCAT school scores less than a five on their hygiene rating sticker, they will implement any recommendations made by the environmental health officer as a matter of top priority. After each environmental health inspection, the school will display their new food hygiene rating sticker in place of the old one, irrelevant of the score.

The school will receive a letter after an inspection with 'notices' – TCAT will comply with the notices with immediate effect.

Monitoring and review

At any point this policy is updated or fully reviewed, it will be updated on the main TCAT website and will automatically update on all TCAT school websites simultaneously.

Where an annual check or other check results in minor changes, the Version History will be reviewed and updated with a change in the number following the decimal point, for example, v1.1 ⇒ v1.2. Where the policy is reviewed in full, then the number before the decimal point will change and reset, for example v1.4 ⇒ v2.0.

Any changes made by the CEO in collaboration with the Board Appointed Trustee will be passed to the Trust Board for ratification and subsequently be notified to Clerks to Local Governing Bodies and Headteachers/Heads of School.

The next scheduled full review date for this policy is 25th June 2029.

Date approved by the Board Appointed Trustee: 26th June 2026.

To be ratified and recorded in the minutes at the first Trust Board Meeting after 26^h June 2026.

Trust Glossary

AA	Admissions Authority	H&S	Health and Safety
AAI	Adrenaline Auto-Injector (Epi Pen)	HoS	Head of School
ACM	Asbestos Containing Materials	HSE	Health and Safety Executive
AHT	Assistant Headteacher	ICO	Information Commissioners Office
AIR	Attendance Intervention Reviews	IDSR	Inspection Data Summary Report
APDR	Assess Plan Do Review Cycle	IHP	Individual Healthcare Plan
APIs	Application Programming Interfaces	IRMS	Information and Records Management Society
ASC	Autistic Spectrum Condition	IWF	Internet Watch Foundation
ASP	Analyse School Performance	KCSIE	Keeping Children Safe in Education
ATH	Academy Trust Handbook	KS1/2/3/4	Key Stage 1/2/3/4
BAME	Black, Asian and Minority Ethnic Backgrounds	LAC	Looked After Child
BAT	Board Appointed Trustee	LADO	Local Authority Designated Officer
BCP	Business Continuity Plan	LGB	Local Governing Body
BFR	Budget Forecast Return	LLC	Low-Level Concerns
CEO	Chief Executive Officer	LSA	Learning Support Assistants
CFO	Chief Financial Officer	MASH	Multi-Agency Safeguarding Hub
CIF	Condition Improvement Fund	MAT	Multi-Academy Trust

CIN	Child in Need	MFA	Multi-Factor Authentication
CLA	Children Looked After	MFL	Modern Foreign Language
CMIE	Child Missing in Education	NCSC	National Cyber Security Centre
COO	Chief Operating Officer	NoV	Note of Visit
COSHH	Control of Substances Hazardous to Health	NPQ	National Professional Qualifications
CP	Child Protection	PA	Persistent Absence
CPD	Continuing Professional Development	PAN	Published Admission Number
CPOMS	Child Protection Online Management System	PECR	Privacy and Electronic Communications Regulations
CSCS	Children's Social Care Services	PEP	Personal Education Plan
CSE	Child Sexual Exploitation	PEEP	Personal Emergency Evacuation Plan
CTIRU	Counter-Terrorism Internet Referral Unit	PEx	Permanent Exclusion
CWD	Children with Disabilities	PP	Pupil Premium
CYPMHS	Children and Young People's Mental Health Services	PPG	Pupil Premium Grant
DBS	Disclosure and Barring Service	PSHE	Personal, Social and Health Education
DDSL	Deputy Designated Safeguarding Lead	PSED	Public Sector Equality Duty
DfE	Department for Education	PTFA	Parent, Teacher and Friends Association
DHT	Deputy Headteacher	QA	Quality Assurance

DSE	Display Screen Equipment	RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
DSL	Designated Safeguarding Lead	RHE	Relationships and Health Education
DPO	Data Protection Officer	RPA	Risk Protection Arrangement
EAL	English as an Additional Language	RSHE	Relationships, Sex and Health Education
ECT	Early Career Teacher	SA	Severely Absent
EDIB	Equality, Diversity, Inclusion and Belonging	SALT	Speech and Language Therapist
EHA	Early Help Assessment	SARC	Sexual Assault Referral Centre
EHCNA	Education, Health and Care Needs Assessment	SBM	School Business Manager
EHCP	Education, Health and Care Plan	SCC	Standard Contractual Clause
EHE	Elective Home Education	SCITT	School-Centred Initial Teacher Training
ELSA	Emotional Literacy Support Assistant	SCR	Single Central Record
ESFA	Education and Skills Funding Agency	SDP	School Development Plan
EVC	Educational Visit Coordinator	SDQ	Strengths and Difficulties Questionnaire
EWOSSO	Education Welfare and Safeguarding Support Officer	SEF	Self-Evaluation Form
EYFS	Early Years Foundation Stage	SEMH	Social, Emotional, and Mental Health
FBV	Fundamental British Values	SENCO	Special Educational Needs Coordinator
FFT	Fischer Family Trust	SEND	Special Educational Needs and Disabilities

FGM	Female Genital Mutilation	SIP	School Improvement Partner
FGMPO	FGM Protection Order	SLA	Service Level Agreement
FOI	Freedom of Information	SLCN	Speech, Language and Communication Needs
FSM	Free School Meals	SLT	Senior Leadership Team
FTS	Find a Tender Service	SPOC	Single Point of Contact
GAG	General Annual Grant	STEM	Science, Technology, Engineering and Maths
GDPR	General Data Protection Regulation	TA	Teaching Assistant
GIAS	Get Information about Schools	TAC	Team Around the Child
HASH	Herefordshire Association of Secondary Heads	TCAT	Three Counties Academy Trust
HBA	Honour Based Abuse	TUPE	Transfer of Undertakings (Protection of Employment)
HR	Human Resources	VSH	Virtual School Headteacher