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| DEPARTMENT | AUDIT REVIEW | FINAL REPORT ISSUED |
| Education & Children's Services | School Meals – Special Dietary Requirements | 12 July 2022 |

BACKGROUND

The Catering Services Section within the Education and Children's Services Department is responsible for the provision of meals to pupils in the Authority's primary and secondary schools. The provision of special diets is a shared responsibility and requires a joint approach and close communication between the School Headteacher, Parent/Guardian and Catering Services Section to minimise risk and provide a safe educational environment for pupils with special dietary requirements.

SCOPE

The purpose of the Audit was to assess the effectiveness of the current procedures and controls in place for pupils with special dietary requirements that have been medically prescribed, including pupils who have allergies, for religious or cultural reasons, or because a pupil is vegetarian or vegan.

The review considered whether:

- Adequate policies and procedures exist in relation to special dietary requirements.
- Adequate information and records are maintained.
- Evidence that catering records are up to date and records between school and catering are documented and evidenced.
- Adequate management information is available and monitored.

SUMMARY OF RECOMMENDATIONS

The audit findings and recommendations are detailed in the attached Action Plan.

A summary of these recommendations, by priority, is outlined below:

| Priority | 3* | 2* | 1* | Total |
|---------------------------|----|----|----|-------|
| Number of Recommendations | 1 | 4 | 0 | 5 |

ASSURANCE RATING

The post review assurance level for systems relating to Special Dietary Requirements is categorised as: **Low**.

Internal Audit review of Special Dietary Requirements 2021/22

Action Plan

| Ref | Summary of Issue Identified | Recommendation | Priority Level | Planned Action Responsible Officer / Target Date | Updated Position |
|-----|--|---|----------------|--|--|
| 1 | <p>There is a Draft Policy for the Provision of Special Diets in place, along with draft guidance and a special diets form, however, these documents have not been published or fully implemented.</p> | <p>Whilst it is acknowledged that guidance is awaited from the WLGA, it is imperative that a consistent, effective approach to the administration of Special Dietary Requirements across all schools is introduced as a matter of urgency, to ensure the risks associated with allergens are appropriately managed.</p> <p>Draft Policy guidance currently in place must be updated to ensure it is current and includes the requirements of all relevant legislation, including the requirements of Natasha's Law.</p> | *** | <p>An initial trial of the draft policy and online allergen form was conducted in December 2021, however, in January 2022, we then had confirmation from the Welsh Local Government Association (WLGA) that it was the intention to start their trial for issuing an all-Wales form for capturing special diet information. There are concerns that with issuing both forms in a relatively short space of time, there will be a duplication of duties / information being collated.</p> <p>The School Catering Team will seek further clarification from the WLGA in terms of their timescale for moving this forward, which will be critical in readiness for the roll out of Universal Primary Free School Meals (UPFSM).</p> <p>Further discussions are ongoing with key stakeholders to collate special dietary information in readiness for the start of the new 22/23 academic year which is when UPFSM will be introduced to full time Nursery and Reception pupils. Parents will be asked to complete a 'Meal Request' form that will include dietary requirement information. Form will be</p> | <p>Registration form for UPFSM is live which was promoted to parents/guardians via several methods; for example, social media / ParentPay / Teacher Centre during the summer holidays. A centralised database has been devised to capture and review responses in relation to special dietary requirements which are then followed up with individual kitchens.</p> <p>Important reminders have been circulated to Head Teachers w/c 20/09/22 in relation to their key responsibilities relating to the management of special diets.</p> |

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| | | | | <p>publicised via social media, CCC website, ParentPay. Link will also be sent to parents in advance of pupils starting school for the first-time using pre-admission contact details in Teacher Centre.</p> <p>Senior Catering Manager 01 September 2022</p> | |
| 2 | <p>The draft procedures require that a 'Summary of Allergen & Medical Dietary Requirements' be updated as and when new pupil(s) start at the school and when pupils leave the school. There is a requirement for this information to be returned to the Catering Services Section, ensuring centrally maintained records are up to date.</p> <p>Internal Audit was advised that copies of these forms were collected during April 2021, as a one-off exercise; the data held centrally is now out of date.</p> | <p>An appropriate process and timescale should be agreed for the collection of Allergen & Dietary Requirement information.</p> | ** | <p>The purpose of asking Cook's in Charge and Cook Supervisors to complete an Allergen Checklist was a one-off exercise, so that we could monitor centrally that the updated paperwork provided had been put in place. At the beginning of each half-term reminders are included in the newsletter circulated to all kitchens in prompting staff to ensure that their Allergen file is appropriately updated and reviewed.</p> <p>Senior Catering Manager Immediate</p> | <p>Kitchen staff continue to receive termly reminders to remind staff to liaise with school staff to identify new dietary requirements in order that kitchen Allergen File/records are updated. This includes removal of pupil data from the file for those pupils that have left the school.</p> |
| 3 | <p>All staff involved in the production of meals for allergen diets must complete an online Level 2 Allergen course; testing on a sample of 10 schools identified that one staff member's training had expired in November 2021.</p> | <p>Allergen Training should be completed, and kept up to date, by all staff involved in the production of meals for allergen diets.</p> | ** | <p>The staff member whose training had expired has since completed the training.</p> <p>Training is currently being reviewed in accordance with the implementation of UPFSM in primary schools to</p> | <p>Pilot commencing September 2022 with 7 kitchens to complete L3 online Allergen course; to be reviewed October 2022.</p> |

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| | | | | consider whether key posts such as Cook's in Charge should complete L3 training, plus the extended roll out of L2 to additional members of staff. Senior Catering Manager 30 July 2022 | |
| 4 | Five schools, from the sample of 10, had not been allocated kitchen colour coded crockery as requested on their submitted allergen checklist form. | Kitchen colour coded crockery should be distributed to all schools, as appropriate. | ** | Coloured crockery has been distributed to schools centrally. Due to prioritisation of tasks, all primary kitchens will have received their crockery by the end of April 2022. Senior Catering Manager 30 April 2022 - Complete | Light equipment inventory exercise was completed with all primary kitchens during the Summer 22 term to determine whether any additional coloured crockery would be required in readiness for implementation of UPFSM. |
| 5 | There is little management information available to assist with effectively monitoring special dietary requirements. | Management information should be produced and reviewed to assist with enabling effective monitoring of special dietary requirements. Consideration should be given to reinstating the Allergen and Diet Committee to assist, for example, with the completion and implementation of the new Policies and Procedures, and to consider reporting protocols e.g., serious incident/near miss reporting requirements. | ** | Initially a working group was established with a couple of pilot Headteachers to review our draft policy and online special diet form. Following this, we received confirmation from the WLGA that they were going to re-introduce their working group to move things forward, as it was also their intention to introduce an online form for all Local Authorities to use. The School Catering Team will seek further clarification from the WLGA in terms of their timescale for moving this forward. | Senior Catering Manager to attend Business Meeting with Primary Head Teachers early October to discuss key processes / ongoing actions for schools to include way forward for standardising documents for schools to be able to capture special dietary information. Work is also underway to develop a monitoring checklist so that additional audits can be conducted by key officers within the department to assess sharing of information with school staff / kitchen staff. |

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| | | | | <p>A further review will also be carried out during Summer 2022 to ascertain how best to manage the process with all key stakeholders in readiness for rolling out UPFSM to wider year groups.</p> <p>Senior Catering Manager 30 September 2022</p> | |