INVICTUS

Education Trust

# Allergy Safety and Anaphylaxis Policy

## Benedict's Law compliant Trust-wide Policy

# Document Control and Version Control

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**Invictus Education Trust**

Allergy Safety and Anaphylaxis Policy

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# 1. Our Mission, Vision and Values

**Mission**

'Excellence every day, unlimited ambition and transforming lives'

**Vision**

'To create a community of inclusive schools where people choose to learn with us, work with us and belong with us, so that everyone succeeds'

**Values**

- Respect
- Resilience
- Relationships

## 2. Policy Statement

Invictus Education Trust is committed to providing a safe and inclusive environment for all students, including those with allergies and those at risk of anaphylaxis. This policy sets out the Trust-wide approach to allergy safety, emergency response, staff training, Individual Healthcare Plans, catering and food allergen management, external providers, animals on site, food events and incident reporting.

Allergy safety is led through safeguarding and student welfare arrangements. Operational teams, including Estates, Site and Operations, provide practical support within their areas of responsibility but do not own student-specific allergy assessment, medication governance, IHPs or safeguarding decisions.

## 3. Scope

This policy applies across all Invictus Education Trust schools and applies to students, staff, regular volunteers, agency workers, contractors, external providers, visitors, catering provision, breakfast and after-school provision, holiday provision, educational visits, lettings and community use where activities may create or affect allergy risk. The policy covers allergy risks arising from food, insect stings, animal allergens, medication, latex, airborne allergens and any other known allergen relevant to student or staff welfare.

## 4. Legal and Guidance Framework

- DfE Allergy guidance for schools, updated July 2026.
- Department of Health guidance on use of adrenaline auto-injectors in schools.
- Section 100 of the Children and Families Act 2014.
- Children's Wellbeing and Schools Act 2026 allergy safety policy requirements.
- Food Information Regulations 2014 and PPDS / Natasha's Law allergen labelling requirements.
- Equality Act 2010, safeguarding duties and common law duty of care.

## 5. Core Principles

Allergy risks must be included on each school's risk register and actively managed through governance arrangements. The policy must promote full participation, reasonable adjustments, pupil voice, dignity and inclusion.

- Allergy safety is a safeguarding and student welfare matter.
- Students with allergies should be supported to participate safely in school life.
- All staff must know how to recognise and respond to an allergic reaction.
- All schools must maintain clear emergency arrangements and accessible medication information.
- Food, animals, events, trips, lettings and external providers must be managed consistently across the Trust, with responsibility allocated to the function commissioning, organising or managing the activity.
- Allergy-related incidents and near misses involving student welfare must be recorded, reviewed and used to strengthen practice.
- Estates / Operations will support practical premises controls where relevant.

# 6. Roles and Responsibilities

| Role | Responsibility |
|---|---|
| **Trust Executive Team** | Approves the Trust-wide policy, receives assurance and ensures there is a consistent framework across schools. |
| **Governance Boards** | The Trust Board provides Trust wide governance oversight of allergy safety as part of safeguarding, student welfare and statutory compliance and the Local Academy Committees ensure that the policy and practise is being implemented at school level. |
| **Headteacher** | Responsible for local implementation. Each school must appoint a named member of the senior leadership team as allergy safety lead. The lead will drive implementation, monitoring and annual review and must be identified in the academy's local arrangements. The Trust's scheme of delegation must make oversight, support and challenge clear. |
| **DSL / Safeguarding Lead** | Co-ordinates allergy safety locally as part of student welfare, including IHP oversight, staff briefings, incident review and liaison with pastoral, first aid and operational teams. |
| **First Aid / Medical Needs Lead** | Supports IHPs, emergency medication arrangements, AAI checks, first aid response and liaison with parents/carers. |
| **Catering Provider - Dolce** | From September 2026, Dolce is the Trust catering provider and will manage catering allergen controls, food service training, menu information and Natasha's Law / PPDS compliance within the catering service. |
| **Estates, Site and Operations Teams** | Support practical premises controls relating to suitable medication storage locations, physical access, signage, cleaning, lettings, Estates-managed contractors and practical site arrangements for animals and events. Estates / Operations do not own medication governance, IHPs, student-specific allergy assessment, event allergy risk assessment or safeguarding/student-welfare decisions. |
| **Activity / Event Organiser** | Responsible for completing relevant activity or event risk assessments and obtaining required approvals, with safeguarding/DSL input where student welfare is affected and Estates input where premises or practical site controls are relevant. |
| **Commissioning Lead** | Responsible for obtaining appropriate assurance from an external provider. Estates is responsible for contractor assurance only where the contractor/provider is commissioned or managed through Estates, or where premises controls are relevant. |
| **All Staff** | Complete required training, attend local briefings, follow IHPs and local procedures, know how to summon help and report incidents or concerns promptly. |
| **Parents and Carers** | Provide accurate allergy and medical information, prescribed medication where required and updates when circumstances change. |
| **Students** | Where age and understanding allow, follow agreed allergy safety arrangements and tell an adult immediately if they feel unwell or may have been exposed to an allergen. |

# 7 Wellbeing, Inclusion and Unacceptable Practice

Schools must actively support the wellbeing of pupils with allergy, address anxiety and stigma, and prevent and respond to allergy-related bullying, including deliberate exposure, threats or exclusion. Pupils with allergy must not be unnecessarily segregated, sent home, penalised for allergy-related absence, excluded from activities or trips, or required to have a parent attend to provide routine support. Medication must remain readily accessible, pupils' and parents' views and healthcare advice must not be ignored, and an unwell pupil must never be sent for help without suitable supervision.

# 8. Identification of Students with Allergies

Each school must have clear arrangements to identify pupils, staff and visitors with known or suspected allergy, including food allergy and asthma, their known allergens, whether they carry medication, and whether a pupil has an Individual Healthcare Plan (IHP), Allergy Action Plan or Asthma Action Plan.

Information may come from:

- admissions forms,
- parents/carers,
- annual data updates,
- medical information,
- school nursing services,
- safeguarding or pastoral teams,
- first aid records
- incident reports.

Allergy information must be reviewed whenever:

- A student joins the school.
- A new allergy is reported.
- Medical advice changes.
- An allergic reaction or near miss occurs.
- A student moves into a new year group or phase of education.
- An activity or event presents a new allergy risk.

The responsibility for maintaining and reviewing student allergy information sits with the school's **medical needs, welfare and safeguarding teams**. This responsibility does not sit with the Estates or Facilities team, although they may support the school's overall compliance and operational arrangements.

# 8. Individual Healthcare Plans and Allergy Action Plans

IHPs must be reviewed at least annually and sooner after a serious incident or near miss, a change in circumstances, medication or clinical advice, or transition between settings. A new setting must create its own IHP, informed by the previous plan. A single IHP should cover all relevant conditions and arrangements.

**Individual Healthcare Plan (IHP)**

- Managed through the SEND/Inclusion process where required.
- Used where a pupil's medical condition has an ongoing impact on their education, attendance, participation or wider school experience.
- Developed in partnership with parents, relevant healthcare professionals and the SEND team.

**Medical Care Plan / Allergy Care Plan**

- Used to manage day-to-day medical needs, including allergies and anaphylaxis.
- Can be prepared and maintained by the school's Lead First Aider or appropriately trained First Aider.
- Sets out known allergens, symptoms, medication, storage arrangements and emergency actions.

Students with allergies may have either a Medical Care Plan, an Individual Healthcare Plan (IHP), or both, depending on the nature and impact of their condition. Where a student is at risk of anaphylaxis, a Medical Care Plan must be in place detailing allergens, symptoms, prescribed medication and emergency procedures. Responsibility for maintaining Medical Care Plans sits with the school's Lead First Aider or appropriately trained First Aider.

If a student's medical condition significantly impacts their educational provision, an Individual Healthcare Plan may also be developed through the SEND process.

This keeps allergy management with welfare/medical staff and first aiders, whilst recognising that SEND may become involved where there is a wider educational need.

Estates may advise on practical storage or physical access arrangements where required.

# 9. Adrenaline Auto-Injectors

Pupils prescribed adrenaline devices must have rapid access to both prescribed devices at all times, including during travel to and from school, lessons, lunch, breaktimes, sports, visits and trips. This includes prescribed auto-injectors and prescribed non-injectable nasal adrenaline devices. Spare AAIs are an emergency back-up and do not replace a pupil's prescribed devices.

First Aid / Medical Needs is responsible for ensuring prescribed and spare AAIs are recorded and routinely checked for expiry and condition in accordance with local medication procedures.

Estates / Site teams may support the provision of suitable, clearly identified and readily accessible physical storage locations and signage.

All adrenaline devices must be stored at room temperature, protected from extremes of heat and direct sunlight, clearly identified and not locked away. Prescribed or spare adrenaline must be capable of being brought to the person and administered within five minutes. Spare AAIs must be stored in pairs and clearly distinguished from devices prescribed to named individuals.

The Trust will adopt the following minimum baseline for spare AAIs, subject to local risk assessment and annual review led through Safeguarding / Student Welfare and First Aid / Medical Needs:

| Setting | Minimum Trust baseline | Required local review |
|---|---|---|
| Primary phase / primary provision | 2 x 150 microgram AAIs and 2 x 300 microgram AAIs | Review against pupil weight/age profile, known allergies and IHPs. |
| Secondary phase / secondary provision | At least 2 x 300 microgram AAIs | Review against student profile and IHPs. Estates may advise on practical location and access considerations for larger or split sites. |

# 10. Emergency Response

Staff must know how to recognise symptoms, summon emergency help, locate medication and spare AAIs, contact first aid support, contact parents/carers and report the incident afterwards.

In suspected anaphylaxis, staff must administer adrenaline immediately and call 999. If in doubt, treat for anaphylaxis. A reliever inhaler must never be used instead of adrenaline to treat anaphylaxis. Mild or moderate reactions must be monitored continuously in a safe place for at least 60 minutes because symptoms can progress.

Estates / Site teams may assist with ensuring that agreed storage points remain physically accessible and appropriately signposted but do not own the clinical emergency-response procedure.

# 11. Staff Training and Local Briefings

Face to Face training to be supplied to nominated first aiders and refreshed every two years. New starters must complete training as part of induction. Volunteer training records must be retained locally.

Each school must also deliver a local allergy safety briefing covering known student allergies, IHP access, medication and spare AAI locations, emergency response arrangements, first aid contacts, food-event controls and CPOMS reporting.

# 12. Catering, Dolce and Natasha's Law

Dolce is the Trust's catering provider from September 2026 and will manage allergen controls within the Trust catering service, including menu information, staff training, food-preparation controls and Natasha's Law / PPDS arrangements for food produced and packaged by the catering operation.

The Trust, school leadership and safeguarding/student-welfare arrangements, remains responsible for ensuring appropriate assurance and management of student allergy risks across the wider school environment, including food events, curriculum activities, food brought from home, food brought by staff or visitors and community activities. Estates / Operations may support premises, cleaning, contractor and event-location controls but will not own catering allergen compliance or student-specific food-allergy decisions.

Natasha's Law applies to prepacked for direct sale food. PPDS food must be labelled with the name of the food and a full ingredients list, with allergenic ingredients emphasised. PPDS food provided in schools can require labelling. Food that is not PPDS still requires allergen information to be available through appropriate means.

Dolce to provide the school with their Natasha's Law Policy to include on each individual school website

# 13. Food Brought Onto Site and Non-Catering Food

Food brought onto site by staff, students, parents/carers, visitors or external providers can present a risk to students with food allergies and must be managed appropriately.

The Trust will maintain an allergy-aware environment. Schools may discourage identified high-risk allergens, including nuts, from being brought on site following local risk assessment, but must not describe the environment as "nut free", as this may provide false reassurance. Controls must address all relevant known allergens and be supported by robust emergency arrangements.

Schools should consider allergy risks when managing:

- Staffroom food and refreshments.
- Classroom treats and rewards.
- Cultural celebrations and special events.
- Food technology and enrichment activities.
- Packed lunches.
- Shared food and food donations.
- Food provided for meetings, visitors or community events.

Anyone organising or authorising an activity involving food is responsible for ensuring that food allergy risks are considered and appropriate controls are implemented.

This should be communicated to parents/carers/staff/students in newsletters, tutor groups, communications sent home

# 14. Bring and Buy Sales, Cake Sales and Events with No Allergen information

Food-related fundraising and community events can present a significant allergy risk where allergen information cannot be verified.

To reduce this risk, schools within the Trust must not permit bring-and-buy sales, bake sales or the sale of homemade food items to students.

All food sold or distributed to students as part of a fundraising event, reward activity or community event must:

- Be purchased from a reputable supplier.
- Be provided in its original sealed packaging.
- Display the manufacturer's ingredient and allergen information.
- Be stored and handled in accordance with food safety requirements.

Food that is homemade, donated, repackaged, unlabelled or supplied without reliable allergen information must not be sold, distributed or provided to students.

Food events involving students must be approved through the school's local event approval process. The event organiser is responsible for ensuring allergen information is available and that any identified risks are appropriately managed.

Where a student with a known allergy may be affected, the school's safeguarding, welfare or medical needs team must be consulted as part of the planning process.

Schools should consider alternative fundraising activities where food safety or allergen controls cannot be assured. Estates and Operations staff may support venue arrangements, cleaning and other practical site controls.

# 15. Educational Visits, PE, Clubs and Enrichment

The activity/trip lead is responsible for ensuring the risk assessment considers known allergies, medication access, staff awareness, food arrangements, transport, emergency contacts and external-provider responsibilities, with safeguarding/student-welfare and First Aid / Medical Needs input where required.

# 16. External Providers and Contractors Working with Students

The school lead commissioning an external provider is responsible for obtaining appropriate assurance before the activity begins.

Where providers work directly with students or student welfare is affected, the DSL / Safeguarding Lead must be involved as appropriate.

Providers must confirm allergy-awareness arrangements, follow Trust and school procedures, avoid introducing unmanaged food or animal risks, know how to summon emergency help and report incidents immediately.

Estates / Operations is responsible for contractor/provider assurance only where the provider is commissioned or managed through Estates, or where premises-related controls fall within Estates' remit. Estates does not assume safeguarding or student-allergy assurance simply because an external provider is operating on Trust premises.

# 17. Lettings and Community Use

Where lettings or community use involve food, animals, children or activities that may create an allergy risk, lettings users will be required to provide food/allergen information, comply with relevant site procedures, manage their own participants and avoid introducing unmanaged allergy risks.

Estates / Operations may administer relevant premises and lettings requirements.

The hirer remains responsible for managing its own participants and activities.

Where a school activity involving its own students takes place within a letting or community-use arrangement, responsibility for student welfare and individual allergy arrangements remains with the academy's safeguarding/student-welfare arrangements.

# 18. Animals on Site

Animals on site can create allergy risks through fur, dander, saliva, bedding, feed or other materials. This includes school dogs, therapy animals, visiting animals, curriculum animals and temporary animal visits. Animals must not be introduced without approval and risk assessment. Where students may be affected, approval must follow the school's local process and include safeguarding/student-welfare consideration of known student allergies and relevant IHPs.

The person organising or requesting the animal activity is responsible for ensuring the risk assessment is completed. Risk assessments must consider known student and staff allergies, IHPs, areas accessed, supervision, hygiene, handwashing, cleaning, parent/carer communication and animal welfare. Estates / Operations may support practical matters relating to areas accessed, cleaning, hygiene facilities and other site controls but does not own the student allergy risk assessment or approval decision.

# 19. Cleaning and Hygiene

Cleaning arrangements must support allergy-risk reduction, including after food events, animal visits, dining provision, spillages and activities with potential cross-contamination risks.

Cleaning teams must receive relevant practical information where their work forms part of an agreed allergy control. Safeguarding/student-welfare or the relevant activity lead must ensure that any student-specific control requiring additional cleaning is communicated through the appropriate operational route.

Estates / Operations is responsible for implementing agreed premises and cleaning controls within its remit, but not for determining the clinical or student-specific allergy requirement.

# 20. Communication and Information Sharing

Health information is special category data under UK GDPR. It must be shared lawfully, proportionately and respectfully with those who need it for safety and inclusion. Where appropriate, pupil and parental views must inform how information is shared. Allergy registers and photographs displayed in food or activity areas must be staff-only.

Relevant allergy information must be shared proportionately and on a need-to-know basis with staff, catering teams, First Aid / Medical Needs teams, trip leaders, relevant external providers and volunteers. Information sharing must comply with data-protection requirements and safeguarding principles.

Estates / Site teams should receive only the information necessary to implement relevant practical premises controls and should not routinely hold student medical information unless there is a clear operational need.

# 21. Incident and Near-Miss Reporting

All serious allergy incidents and near misses involving a pupil, member of staff or visitor must be recorded as soon as feasible, including in the accident book and any relevant Trust recording system, and reviewed in a no-blame, lessons-learned spirit. Reports must be shared with the designated senior allergy lead and, for pupils aged up to 16, parents/carers as soon as possible. The governing body or Trust Board must receive appropriate periodic assurance and reporting.

Where the incident relates to student welfare, it must be recorded on CPOMS in line with school safeguarding and welfare procedures.

Records should include the student, date/time, location, suspected trigger, symptoms, action taken, medication administered, emergency-services involvement, parent/carer contact, staff involved and learning or follow-up actions. The DSL / Safeguarding Lead will co-ordinate student-welfare review as appropriate, with First Aid / Medical Needs involvement where medication or clinical response is relevant.

Estates / Operations should be involved in the review only where premises, cleaning, contractor, access, storage or other site controls contributed to the incident or require corrective action.

# 22. Review After Incident or Near Miss

Following an allergy-related student incident or near miss, the school must consider whether the student's IHP or Medical Care plan requires review, staff require further briefing, parents/carers require further communication or safeguarding/student-welfare controls need amendment.

The relevant responsible function must also consider whether catering controls, provider arrangements, event controls or risk assessments require review. Estates / Operations must review and address any identified premises, cleaning, storage, access, contractor or site-control issues within its remit. Estates / Operations is not responsible for leading the overall student-welfare incident review.

# 23. Monitoring and Assurance

- Each school must be able to evidence staff-training completion, local briefing completion, IHP review or Medical Care Plan review, student-welfare incident recording and follow-up action.
- First Aid / Medical Needs must be able to evidence prescribed/spare AAI management and relevant medication checks.
- The relevant commissioning or activity lead must be able to evidence external-provider assurance and event/activity risk assessments.
- Dolce must provide appropriate assurance relating to catering allergen controls and PPDS/Natasha's Law requirements.
- Estates / Operations must be able to evidence relevant premises controls, including agreed storage/access arrangements, cleaning controls, Estates-managed contractor assurance and lettings controls where applicable.

Overall policy assurance should be coordinated through the Trust's safeguarding/student-welfare governance route, with supporting assurance supplied by the relevant professional functions.

# 24. Parental Impact Assessment

As part of the policy development process, consideration has been given to whether the policy has a direct impact on parents and carers.

This policy does affect parental responsibilities and required communication, as parents/carers must provide accurate allergy and medical information, prescribed medication where required, and participate in IHP review where relevant.

**Decision:** Parental communication is required for this policy. Method of communication will be via Trust/school website publication, parent/carer communication where a child has a known allergy, and school-level updates where food events, allergy controls or IHP arrangements require parent/carer engagement.

# 25. Appendices

### Appendix 1: School Implementation Checklist

☐ Name the school senior leader responsible for allergy safety and record this in local arrangements.
☐ Identify all students with known allergies.
☐ Review IHPs and allergy action plans.
☐ Confirm AAI storage, access and checking arrangements.
☐ Ensure staff complete National College allergy training.
☐ Retain volunteer training records locally.
☐ Deliver local allergy safety briefing.
☐ Review Dolce catering allergen arrangements locally.
☐ Issue external provider assurance forms.
☐ Review food events and fundraising controls.
☐ Review animals on site arrangements.
☐ Confirm CPOMS reporting route.
☐ Report completion to Trust as required.
☐ Add allergy safety to the school risk register and governance assurance cycle.
☐ Review wellbeing, inclusion and allergy-related bullying controls.
☐ Replace "nut free" wording with an allergy-aware approach.
☐ Test that prescribed and spare adrenaline can reach any relevant location within five minutes.
☐ Confirm incident recording in the accident book and external reporting routes.
☐ Publish and publicise the policy and make a hard copy available on request.

### Appendix 2: External Provider Assurance Form

Provider name: _____

School: _____

Service/activity provided: _____

Dates/frequency of provision: _____

Provider lead contact: _____

The provider confirms that staff working with students have appropriate allergy awareness arrangements, know how to summon emergency help, will follow school procedures, will not introduce food/animals/allergy risks without prior agreement and will report incidents immediately.

Provider signature: _____ Date: _____

School approval: _____ Date: _____

**Appendix 3: Food Event Allergy Risk Assessment Prompt**

- What food is being provided, sold or shared?
- Who is providing the food?
- Is allergen information available?
- Are any students with known allergies likely to attend?
- Are IHPs relevant to the event?
- Could food be substituted, restricted, labelled or replaced by non-food fundraising?
- How will food be supervised?
- How will cross-contamination be reduced?
- How will parents/carers be informed if needed?
- What cleaning is required afterwards?
- Who has approved the event?

**Appendix 4: Animals on Site Risk Assessment Prompt**

- What animal is attending?
- Why is the animal attending?
- Which students will have contact?
- Are there known student or staff allergies?
- Are any IHPs relevant?
- Which areas will the animal access?
- What supervision is in place?
- What hygiene/handwashing is required?
- What cleaning is required?
- Has parent/carer communication been considered?
- Has animal welfare been considered?
- Who has approved the activity?

**Appendix 5: Legal and Guidance Links**

- DfE Allergy safety in schools statutory guidance, July 2026: source link
- DfE Allergy guidance for schools: source link
- Department of Health guidance on the use of adrenaline auto-injectors in schools: source link
- Food Standards Agency guidance on PPDS / Natasha's Law: source link

**Appendix 6: SCHOOL ALLERGY REGISTER**

This register should be reviewed regularly and updated whenever allergy information changes.

| Student Name | Year Group | Tutor Group | Photograph | Allergy/Allergen | Severity | Prescribed Medication | | Anaphylaxis Risk (Y/N) | Medication Location | Healthcare Plan (Y/N) | Dietary Requirements | Parent/Carer Contact Number | Review Date |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
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