

Diet, Nutrition, Food and Drink in Schools Policy

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Purpose

Food and drink are important aspects of all people's quality of life. Having choice and understanding how to make healthy choices is crucial. This policy aims to ensure that all children and young people are supported to choose a nutritious diet and enjoy their meals and mealtimes. Schools and Children's Services should comply with relevant guidance and legislation, and aim to achieve high standards regarding provision and promotion of a healthy and nutritious lifestyle for children and young people. Staff should encourage positive social behaviour at mealtimes as appropriate, and enable children and young people to make choices and enjoy a healthy relationship with food.

Scope

This policy applies to all NAS Schools and Children's Services where food and drink are provided.

Approach

In offering all children and young people a balanced, nutritious, healthy and enjoyable lifestyle that promotes good health and wellbeing, the NAS is responding to the government report <u>Healthy Lives, Healthy People</u> and to <u>The School Food Plan 2013</u> report which named better diet as an important lifestyle factor which can contribute to good health. The Food Plan additionally identifies that:

- Eating healthily and well reduces chances of falling ill
- Children who eat well perform better at school
- There are many hidden benefits to a good food culture including social development

The aim of this policy is to promote a good diet, but does recognise that some food items may be difficult for some individuals with an autism spectrum disorder.

A healthy range of nutritious, varied, balanced and attractively presented food will be offered at every mealtime with opportunities for choice.

Obsessive and restricted patterns of behaviour can focus around food and drink, so staff should encourage balanced healthy choices by providing variety and using different cooking methods in order to help children and young people find food they enjoy.

Operational Delivery

Young people and children should be at the centre and fully consulted using their preferred communication about dietary preference and need.



Where appropriate parents/carers will be consulted about decisions regarding food and drink that may influence their own practice at home. Class and residential staff will consult to ensure consistency of decisions and always in the child's best interest.

Mealtimes will be structured in a way that meets individual needs but also encourages acceptable social behaviour. Opportunities should be sought to develop teaching and learning around healthy food choices. Children and young people will be encouraged to communicate preferences, behave in a socially accepted way and to interact with others.

Where there are concerns over diet, a dietician or doctor may be consulted as appropriate and/or medical advice taken. This will include, where appropriate, consultation with parents/carers at every stage.

Any specific dietary requirements, including those to meet all outlined cultural needs, will be catered for. These will be established prior to admission to ensure all special requirements can be obtained and will be detailed in the individual pupil files and / or Education, Health and Care Plan (EHCP).

Meals will be nutritious and balanced, and prepared with adherence to this policy without impacting on personal choice. Where applicable all staff should be given the opportunity to undergo training in understanding what a nutritious and balanced diet entails and support, where needed, to develop their practical skills in preparing and providing such. In addition, Schools and Children's Services should consult current guidance aimed specifically at children, such as that issued by the Caroline Walker Trust and Ofsted.

Schools and Children's Services should be guided by the School Food Plan document 'School Food Standards: A practical guide for schools, their cooks and caterers'.

<u>The School Food Standards</u> require that food provided to pupils in school is nutritious and of high quality; to promote good nutritional health in all pupils; protect those who are nutritionally vulnerable and to promote good eating behaviour.

Schools may still wish to use the Healthy Schools Toolkit, though archived from the Department for Education website it is still available for schools to use themselves at https://www.healthyschools.org.uk/. The toolkit is designed to help schools to 'plan, do and review' health and wellbeing improvements for their children and young people.

If food is used as a reward, consideration will be given to ensuring that such rewards are of a minimum and that these are at a level commensurate with healthy living. These rewards should be clearly outlined in the individual support and care plans.



Meals will under no circumstances be withheld as part of a behaviour management programme.

If meals are refused by pupils this should be recorded and action taken as appropriate.

Individual Support Plans and pupils/students profiles will record personal likes and dislikes of individual children and young people, with strategies to address the impact of food obsessions. Plans will also include objectives for mealtimes and healthy eating, if appropriate.

Where applicable residential pupils will be offered a range of meals such as picnics, cafes, takeaways, fast food outlets as appropriate, and subject to individual risk assessment and detailed in Care Plans.

All children will be offered foods and drinks which, by themselves, would not be considered nutritious and balanced, such as cakes, pastries, sweets, chocolate, biscuits and crisps, with staff having an awareness of how these foods fit into an overall wellbalanced diet and lifestyle.

Where possible staff will provide whole grain, minimally refined grains and foods made from grains such as bread, pasta, rice and all baking, with staff having an awareness of the health benefits of doing so.

Older children and young people will be able to, or will work towards, choosing and preparing a range of food either for themselves, their peers or invited guests, as appropriate and detailed in the specific Individual Care Plans.

All children and young people will be able to access snacks and drinks at reasonable times. Staff will assist in the preparation of snacks subject to risk assessment. Consideration will be given to encouraging snacks that are at a level commensurate with healthy living and any restrictions will be detailed in Individual Care Plans or Person-Centred Plans.

Mealtimes will be structured to meet the needs of the children and young people living in the service, but flexible to fit in with programmes of activities and other events. The environment will be homely, relaxed and congenial.

Staff will, if required, provide assistance at mealtimes, ensuring any aids necessary and physical requirements are met.

Menus should be devised in consultation with children and young people, using preferred communication methods. Support, education and guidance should be given



to promote nutritional value and variety. Menus should be reviewed regularly, and then retained for inspection for one year.

A variety of fresh fruit and vegetables will be available, with an aim to achieve at least 5 portions daily. Staff will be provided with training and resources to understand what constitutes a portion and the importance of incorporating 5-a-day into diets.

Where possible all food (meals and snacks), should be prepared from whole food ingredients rather than from prepared, packaged and processed food. As far as possible use of such foods should be kept to a minimum. Staff training should be provided, as required, to meet this requirement. When food is provided to the people we support that has a label, staff should be able to extract the relevant information from that label to decide if and how that food fits in to the overall nutritious balance of the diet.

Where possible children over 11yrs should not consume more than 6 grams (1 teaspoon) per day of salt, and the daily recommended maximum for children is less (1-3 years <2g, 4-6 years <3g, 7-10 years < 5g). Recommended maximum amounts include added salt and salt used in cooking. Staff should be aware that many processed, packaged foods can be high in salt and should minimise use of these foods. Also, staff should understand labels to assess the levels of salt in these foods and be able to advise the children and young people they are supporting.

Drinks should be offered regularly throughout the day with a strong emphasis being placed on low, or no sugar, water-based drinks whilst also having an awareness of the potential for artificial colours, flavours and sweeteners to have an adverse health effect on some children. Fruit juice should, whenever possible, be diluted to minimise the sugar content and plain water should be freely available at all times and promoted by staff.

Children and young people should be fully included in shopping, food choices and food preparation whenever possible. Resources, such as those available at www.easyhealth.org.uk, can be used to explain nutritional concepts. Preferred communication will be used to aid understanding and involvement.

Children and young people should be given the option to eat free range food and animal welfare should be considered. Meat and dairy products that are free range, and meat that is RSPCA approved or has the British Meat Quality Standard mark, should be considered when possible.

Children and young people should be encouraged to include portions of fish in their diet. The School Food Plan document '<u>School Food Standards: A practical guide for schools,</u> <u>their cooks and caterers</u>' details that oily fish should be served once or more every 3 weeks. In order to encourage consumption, different cooking methods should be tried, and a variety of fish should be offered, including different types of shellfish, white fish and oily fish. Children should avoid eating any shark, swordfish or marlin due to the levels of



mercury in these fish. The National Health Service recommended that girls should not have more than 2 portions of oily fish per week (NHS).

The school 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
- Increasing use of fats/oils that are high in polyunsaturated fats
- Reducing use of sugar in recipes
- Avoiding using additional salt in cooking process
- Increasing the use of food items containing high amounts of fibre

The school should keep a register of any pupil with an allergy. This is usually detailed on a pupil's Education, Health and Care Plan (EHCP) but schools should also consult with parents to check for recent changes. Schools should make all staff aware of allergies and intolerances and food arrangements and procedures should ensure individual needs in relation to allergies and tolerances are provided for.

All pre-packaged foods supplied will clearly display the following information on the packaging – <u>see Natasha's Law</u>:

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

The school will comply with the NAS Food Safety Policy HS-0510.

Allergens

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, staff will use labels to denote which of the 14 allergens are or may be present. Pre-packaged food sold at the 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.

Schools may have pupils with severe food allergies i.e. Epi-Pen and may need to be "Free From" schools as part of their risk assessment.

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 school will use reputable suppliers to source their produce, ensuring the quality of the food served is the same as they have promised to consumers. The school 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 school's produce comes from and the school will be prepared to produce this record on demand by an environmental health officer.

Kitchen 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 headteacher is notified. Parents will be informed of the outbreak, in line with the school'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 75°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. Colourcoded chopping boards and corresponding knives will be used for food preparation. The school 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
Purple	Allergens / Free-from

Roles and Responsibilities

The governing board is responsible for:

- The provision of food for the school ensuring pupils entitled to FSM and pupils who have requested school meals receive them.
- Ensuring the agreed food provision adheres to the food standards.
- Providing hot lunches, wherever possible, to ensure that all pupils are able to eat one hot meal a day.
- Providing FSM to a pupil if they and/or their parent meets the eligibility criteria.
- 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.

The Principal is responsible for:

- Organising food hygiene training, including on allergens, for all in-house kitchen staff.
- Ensuring any external catering companies have an up-to-date food hygiene certificate.
- Inspecting the school kitchens with the head cook to ensure facilities are cleaned to the highest standards.
- Ensuring the kitchen staff have completed and keep an up-to-date food hygiene plan.
- Discussing with the 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.
- Organising refresher training for staff with regards to health and safety and food hygiene.
- Completing relevant risk assessments, e.g. School Food Risk Assessment.
- Keeping staff employment records for as long as required, in line with the Records Management Policy.
- Ensuring that all pre-packaged foods available at the school provide full ingredient lists and allergen labelling.
- Ensuring that drinking water is provided free of charge at all times.

The head cook / catering manager is responsible for:

- Providing the Principal with a copy of their food hygiene certificate upon request, where applicable.
- Ensuring a food hygiene record is kept, to demonstrate how the school ensures all food and its preparation methods are safe, and that this is reviewed on a monthly basis.
- Checking the temperatures of fridges daily to ensure they are running at the correct temperature and documenting these in the food hygiene record.
- Other health and safety checks as outlined in NAS Health and Safety policies.
- Ensuring PPE is undamaged, e.g. free from tears, rips or burns, and that there is enough PPE for each member of staff working in the kitchen.
- Ensuring there are sufficient numbers of colour coded chopping boards for food preparation
- 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, e.g. batches of food being reported as holding unsafe levels of harmful bacteria.
- Ensuring a cleaning schedule is maintained and reviewed regularly for its effectiveness.
- Ensuring high standards of personal hygiene is maintained at all times.
- Ensuring the food served to pupils is nutritious and provides them with a healthy balanced diet in line with the school'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.

Equal Opportunities

Ingredients and menus will take into account cultural, medical and religious requirements, and sensory needs. Preferences, such as vegetarianism, will be respected



and accommodated. Meat and dairy products purchased should meet appropriate animal welfare standards.

Services will cater for all sensory, cultural, religious, health and dietary needs such as vegetarian, gluten/wheat free, dairy free, food suitable for diabetics, organic food and any other need or preference. Any special diet or change in need will be provided in consultation with a transdisciplinary team.

Legal Framework

The Requirements for School Food Regulations 2014

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

The Food Information (Amendment) (England) Regulations 2019

Department for Education 'School food in England'

The School Food Plan 'School Food Standards: A practical guide for schools, their cooks and caterers'

HM Government (2010) Healthy Lives, Healthy People

The School Premises (England) Regulations 2012

References and Information

<u>The School Food Plan report</u> (Henry Dimbleby & John Vincent) July 2013 The British Nutrition Foundation (<u>www.nutrition.org.uk</u>) The British Association for Parenteral and Enteral Nutrition (BAPEN) (<u>www.bapen.org.uk</u>) Easyhealth (<u>www.easyhealth.org.uk</u>) Food Standards Agency (<u>www.food.gov.uk</u>) Healthy Schools Toolkit (<u>www.healthyschools.org.uk</u>) Eating Well: Children and Adults with Learning Disabilities (<u>Caroline Walker Trust</u>)

Related policies

Food Safety Policy HS-0510 Health and Safety Policy HS-0101



Infection Control Management Standard HS-0411



Appendix 1 - Current food-based standards for school lunches

The school is committed to providing pupils with a healthy balanced diet, in line with the School Food Plan's 'School Food Standards: A practical guide for schools, their cooks and caterers'. The school will use the following standards when planning meals and adapting the healthy eating strategy.

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.
- A 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.
- A portion of non-dairy sources of protein will be provided on three or more days every week.
- A meat or poultry product, e.g. chicken nuggets, will be served no more than twice a week.
- No meat will be provided if it contains any carcase parts, in accordance with The Products Containing Meat etc. (England) Regulations 2014.
- 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.
- The school 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 the school 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

NB. Whole milk may be provided for pupils up to the end of the school year in which they reach five years old.

Portion sizes and food groups

The school 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) 1-2 slices of medium bread 1 small roll 1 small or ½ large bagel 1 small pitta 2 6-inch wraps 1 10-inch wrap 	 (80-100g) 2 thick slices of bread 1 large roll or sub roll 1 large bagel 1 large pitta 1 12-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	Dried	15-20g	30g
Pulses, including lentils, kidney beans, chickpeas	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)



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
Read 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	l egg	1-2 eggs
Meat alternatives made from soya beans, e.g. tofu	Cooked	50-70g	70-100g
	Raw	20-25g	40-45g
Pulses, e.g. beans, chickpeas, lentils	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)



Food type	Raw, dried or cooked	Primary-aged pupils (aged 4-10)	Secondary-aged pupils (aged 11-18)
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



Food type	Primary-aged pupils (aged 4- 10)	Secondary-aged pupils (aged 11-18)
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

Cereals offered as part of breakfast clubs will be high in fibre and will not exceed 22.5g per 100g serving.



Appendix 2 - 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, and/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