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2 July 2020

PRIVATE AND CONFIDENTIAL

Janet Finch-Saunders, AM,
Chair of the Petitions Committee.Address
National Assembly for Wales

Dear Janet,

**P-05-932 Education On Food Allergies In Schools and
Mandatory EPI PEN Training**

Thank you for the opportunity to respond to this petition and apologies for not responding to you sooner. In relation to the role of schools, food allergies and what advice is available to them, schools currently use the following guidance:

1. Supporting learners with healthcare needs

<https://gov.wales/sites/default/files/publications/2018-12/supporting-learners-with-healthcare-needs.pdf>

This document is designed to assist local authorities, governing bodies, education settings, education and health professionals and other organisations to support learners with healthcare needs and ensure minimal disruption to their education. It contains both statutory guidance and non-statutory advice.

As stated in the supporting learners with healthcare needs guidance, governing bodies must ensure that plans, arrangements and procedures to support learners with healthcare needs are in place and are properly and effectively implemented. These arrangements and procedures could be placed within a single healthcare needs policy for the education setting. This would provide an accessible guide to assist staff when responding to the healthcare needs of learners. Governing bodies should seek advice from their local authority, health board and any other relevant health or social care professionals to develop these arrangements.

In terms of food management (page 13), where food is provided by or through the education setting, consideration must be given to the dietary needs of learners. For example, those who have diabetes, coeliac disease, allergies and intolerances. Where a need occurs, education settings should in advance provide menus to parents and learners, with complete lists of ingredients and nutritional information. Gluten and other intolerances or allergens must be clearly marked. Providing information will help facilitate parent and catering teams collaborative working. This is especially important when carbohydrate counting is required.

Consideration should also be given to the availability of snacks. Sugar and gluten-free alternatives should always be made available. As some conditions require high calorific intake, there should always be access to glucose-rich food and drinks.

Food provided for trips must reflect the dietary and treatment needs of the learners taking part. Food provided for snacks in classroom settings should also take the dietary and treatment needs of these learners into account. While healthy school and 'no sweets' policies are recognised as important, learners with healthcare needs may need to be exempted from these policies. Learners needing to eat or drink as part of their condition should not be excluded from the classroom or put in isolation.

➤ **Emergency medication**

Emergency medication must be readily available to learners who require it at all times during the day or at off-site activities. Medicines and devices such as asthma inhalers, blood glucose testing meters and adrenaline auto-injectors (pens) should be readily available to learners and not locked away. This is particularly important to consider when outside of the education setting's premises, for example, on trips. If the emergency medication is a controlled drug it should be kept as securely as possible so as to minimise the risk of unauthorised access while also allowing quick access if this might be necessary in an emergency. For example, keys should not be held personally by a member of staff. A learner who has been prescribed a controlled drug may legally have it in their possession, if they are competent to do so, and they must not pass it to another learner or other unauthorised person.

➤ **Emergency procedures**

Governing bodies should ensure that a policy is in place for handling emergency situations. Staff should know who is responsible for the policy, nominated first aiders and how to deal with common healthcare needs. In situations requiring emergency assistance, 999 should be called immediately. The location of learners' healthcare records and emergency contact details should be known to staff. Where a learner has an Individual Health Plan, this should clearly define what constitutes an emergency and explain what to do. Staff should be made aware of emergency symptoms and procedures.

Other learners in the education setting should also know what to do in general terms in an emergency, such as to inform a member of staff immediately. If a learner needs to be taken to hospital, a staff member should stay with the learner until a parent

arrives. This includes accompanying them in an ambulance to hospital. The member of staff should have details of any known healthcare needs and medication.

➤ **Reviewing policies, arrangements and procedures**

Governing bodies should ensure that all policies, arrangements and procedures are reviewed regularly by the education setting. Individual Health Plans may require frequent reviews depending on the healthcare need – this should involve all key stakeholders including, where appropriate, the learner, parents, education and health professionals and other relevant bodies.

2. Guidance on the use of emergency adrenaline auto-injectors (AAIs) in schools in Wales

<https://gov.wales/sites/default/files/publications/2018-12/guidance-on-the-use-of-emergency-adrenaline-auto-injectors-in-schools-in-wales.pdf>

This guidance document is primarily to provide advice to schools and LAs on changes to UK regulations which allow schools to obtain, without prescription, adrenaline auto-injectors for emergency use

As stated in the guidance, schools are not required to hold spare AAIs for emergency use - this is a discretionary power enabling schools to do so if they so wish. If a school decides to hold a spare AAI, they should produce a policy on its use. The policy needs to be developed in line with the guidance and the Supporting Learners with Healthcare Needs statutory guidance.

The role of assisting or supervising the administration of medicines is voluntary. Where staff volunteer or are contracted to carry out this role, the LA and governing body must ensure they receive appropriate and effective training, support and feel confident in their duties.

➤ **Training**

Staff will require effective training in order to administer the spare AAI in an emergency. Roles around staff training are set out fully in the Supporting Learners with Healthcare Needs statutory guidance.

Training resources can be found online, including at <http://www.sparepensinschools.uk> although this is not a substitute for face-to-face training. The school nurse or local health board may be able to provide advice on arranging training. Parents/pupils may also have the contact details of allergy healthcare professionals.

Also relevant to the detail of this petition is the Welsh Network of Healthy Schools Scheme and the new Curriculum for Wales:

3. The Welsh Network of Healthy Schools Scheme

The Welsh Network of Healthy School Scheme (WNHSS) takes a whole school approach to promoting health and wellbeing in line with the World Health Organization model and works across 22 Local Authority areas in Wales. The whole school promotes the health of all who learn, work and play within the school with an approach that addresses the ethos, policies and practices of each school, while also focusing on what happens in the classroom and taking account of the community beyond the school. The Scheme supports schools to enable pupils and staff to take control over aspects of the school environment which influence their health in addition to formally teaching pupils about how to lead healthy lives. Each area employs Healthy School Practitioners who support cohorts of schools in their area to stimulate whole school approaches to health and wellbeing.

A health promoting school actively promotes, protects and embeds the physical, mental and social health and well-being of its community through positive action. This can be achieved by policy, strategic planning and staff development about its curriculum, ethos, physical environment and community relations. The WNHSS incorporates 7 health topics to be completed over 6 phases. Of these, the most relevant to food allergies and the use of EPI pens are: **Food and Fitness, Hygiene and Safety**. Each topic has 4 assessment areas to embed the topic into the day to day functioning of the school:

- Leadership and communication
- Curriculum
- Ethos and Environment
- Family and Community Involvement

For schools to progress through the scheme, they must ensure that they meet all of the criteria outlined in the framework. The framework does not specify lesson content, however, we promote that all food and drink offered throughout the school day is consistent with the Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations 2013 ('Healthy Eating in Schools Regulations'). Monitoring and recording procedures need to be in place including risk assessments and every school should have a Healthcare Needs Policy in place that includes the use of epi pens. Other policies include first aid, administration of medication and safety in other environments relevant to school location, educational visits, food safety and playground safety. The schools must also have a commitment to whole staff training on safety related issues and that teachers receive appropriate training.

4. New School Curriculum for Wales 2022

You will be aware that in 2022, a new Welsh curriculum for young people aged 3-16 will be rolled out in all schools across Wales. This new curriculum has more emphasis on equipping young people for life and offers six areas of learning and experience, one of which is Health and Well-being.

The Health and Well-being Area of Learning and Experience (AoLE) provides a holistic structure for understanding health and well-being. It is concerned with developing the capacity of learners to navigate life's opportunities and challenges. The fundamental components of the Health and Well-being AoLE are physical health and development, mental health, and emotional and social well-being. It will support learners to understand and appreciate how the different components of health and well-being are interconnected, and it recognises that good health and well-being are important to enable successful learning. Engagement with this AoLE will help to foster a whole-school approach that enables health and well-being to permeate all aspects of school life.

This new area of learning experience will help learners to understand the factors that affect physical health and well-being. This includes health-promoting behaviours such as physical activity, including but not limited to sport; as well as the importance of a balanced diet; personal care and hygiene; sleep; and protection from infection. Learning about behaviours, situations and conditions that affect physical health and well-being could include learning about substance misuse, the development of first aid skills and an understanding of health conditions – including different food allergies.

From this understanding, learners can develop positive, informed behaviours that encourage them both to care for and respect themselves and others. These behaviours support learners' sense of self-worth, their overall mood and energy levels. Learners will also be encouraged to develop the confidence, motivation, physical competence, knowledge and understanding that can help them lead healthy and active lifestyles which promote good physical health and well-being. By learning how to communicate their feelings, learners will be better placed to create a culture where talking about mental health and emotional well-being is normalised.

The Health and Well-being area of learning experience can also help learners to understand how decisions and actions impact on themselves, on others and on wider society, both now and in the future. It can also help learners understand the factors that influence decision-making, thus placing them in a better position to make more informed and considered decisions. Learning and experience in this AoLE can enable learners to develop the critical-thinking skills necessary to consider their decision-making in terms of possible implications, including risks, for themselves and others. This can offer learners opportunities to engage in collective decision-making and to understand the importance of their contributions to this process e.g. developing an understanding that I need a balanced diet and I can make informed choices about the food I eat and prepare to support my physical health and well-being.

The new curriculum will offer Learners with appropriate opportunities to assess and manage risk so they can keep themselves and others safe. Schools will need to consider what strategies their learners may need to be able to safely intervene to support others who may be at risk. This may include lifesaving skills and first aid.

A fundamental aspect of the new school curriculum will be the schools' responsibility to decide their own content to deliver the curriculum, based on their own Learners needs and school context.

I do hope this assists the Committee in its deliberations and please do not hesitate to let me know if you have any further queries.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tracey Cooper', written in a cursive style.

Dr Tracey Cooper

Chief Executive, Public Health Wales

Rydym yn croesawu gohebiaeth yn y Gymraeg neu'r Saesneg
We welcome correspondence in Welsh or English