



Food & Nutrition Policy

Vision: *Grow - Flourish - Achieve*

Mission: *Growing Flourishing Achievers through an innovative and sustainable learning environment that fosters academic excellence with holistic development.*

Approved By : Albertha Huyser
Effective Date : 7 April 2026
Next Review : 7 April 2027
Policy Owner : Senior Leadership Team

INTRODUCTION

GEMS Founders School-Masdar City is committed to providing a safe, healthy, inclusive, and supportive environment that promotes the well-being of all students. Good nutrition is fundamental to students' physical health, emotional well-being, behaviour, concentration, and academic performance.

This Food & Nutrition Policy establishes clear expectations and standards governing all food and beverages consumed within the School's care and control. The policy applies to food brought from home, food supplied by external vendors, and food associated with school activities and events. It ensures that all food is safe, hygienic, halal-compliant, and nutritionally appropriate while meeting ADEK, ADPHC, ADG-2, and ADAFSA requirements.

POLICY OBJECTIVES

The objectives of this policy are to:

- Promote healthy eating habits and lifelong nutrition awareness
- Ensure all food consumed on campus is safe, hygienic, halal-compliant, and nutritionally balanced
- Protect students by reducing exposure to high-risk and unhealthy foods
- Safeguard students with food allergies and special dietary requirements
- Support students' physical growth, cognitive development, and academic achievement
- Provide clear and consistent expectations for students, staff, parents, and service providers



- Ensure full compliance with ADEK, ADPHC, ADG-2, and ADAFSA standards

SCOPE OF APPLICATION

This Food & Nutrition Policy applies comprehensively to all members of the School community and to all food and beverages consumed within the School's care and control.

Persons Covered by This Policy

This policy applies to:

- All students across all year groups, including Early Years, Primary, Secondary, and future Sixth Form
- All teaching staff, including full-time, part-time, supply, and substitute teachers
- All non-teaching staff, including administrative, operations, security, and subcontractors
- External contractors and service providers, including catering vendors, activity providers, and event suppliers
- Parents, guardians, and visitors are present on school premises or participating in school-related activities

All individuals are expected to comply with the School's food and nutrition standards and support their consistent implementation.

Activities and Contexts Covered by This Policy

This policy governs all food and beverages, regardless of source, that are:

- Consumed during the school day, including arrival, instructional hours, and dismissal
- Consumed during break and lunch periods across classrooms, communal areas, and outdoor spaces
- Consumed during celebrations, including birthdays, cultural events, and school activities
- Consumed during school-led activities such as trips, excursions, sporting events, and competitions
- Consumed on or off campus under the School's duty of care



Food Sources Covered

This policy applies equally to food and beverages that are:

- Brought from home as packed lunches or snacks
- Purchased from the school canteen or approved vendors
- Provided during approved events, celebrations, or school activities

FOOD CLASSIFICATION AND NUTRITIONAL STANDARDS

The School adopts the ADPHC food classification model as the foundation of all nutrition standards.

Green category foods are encouraged and should form the majority of daily consumption. These include fresh fruits and vegetables, whole grains, lean proteins, unsweetened dairy products, and water.

Amber category foods are permitted only within defined nutritional limits and must be controlled in portion size and frequency to prevent overconsumption.

Red category foods are strictly prohibited on school premises under all circumstances. These include fried foods, sugary items, sweets, soft drinks, energy drinks, processed meats, artificial additives, non-halal food, and high-risk allergenic foods.

The School follows the Healthy Plate Model, promoting balanced meals consisting of fruits and vegetables, whole grains, and lean protein.

Detailed examples of food groups and Green, Amber, and Red category classifications in line with ADPHC requirements are provided in **Appendix A (A.1)**.

HALAL FOOD REQUIREMENT

The School maintains a strict halal food environment.

All food and beverages consumed on school premises must be halal-compliant. Non-halal food items, including pork, pork derivatives, alcohol, and alcohol-based ingredients, are strictly prohibited.



This requirement applies equally to food brought from home, food supplied by the canteen, and food associated with school events. Non-compliance is addressed immediately in line with School procedures.

SCHOOL FOOD OPERATING MODEL

The School operates a controlled food provision model through an approved external vendor.

Food is prepared off-site and delivered daily. No cooking or reheating takes place on school premises. The School ensures that all food provision complies with ADAFSA food safety standards, halal certification requirements, and approved nutritional guidelines.

Vendor operations are monitored to ensure compliance with hygiene standards, allergen labelling requirements, and safe food handling practices.

PACKED LUNCHES AND FOOD BROUGHT FROM HOME

Students are permitted to bring food from home, provided it complies with the School's nutrition standards and halal requirements.

Packed lunches should be balanced and nutritious, including fruits, vegetables, whole grains, and appropriate protein sources. Sugary drinks, processed snacks, and prohibited items are not permitted.

Food sharing or swapping is discouraged to minimise allergy risks and ensure food safety.

Temperature Control and Food Safety for Packed Lunches

Parents and guardians are responsible for ensuring that packed lunches are prepared and stored safely before consumption.

Perishable food items should be kept at safe temperatures using insulated lunchboxes and appropriate cooling elements where required. Foods that require refrigeration or reheating are discouraged unless suitable temperature control can be maintained.

The School does not accept responsibility for food spoilage resulting from inadequate temperature control in packed lunches. Staff may advise students to avoid consuming food that appears spoiled or unsafe in order to protect student health and wellbeing.

Additional guidance on food safety, temperature control, and acceptable food groups for packed lunches is provided in **Appendix A (A.4)**.



STUDENT WELFARE – ACCESS TO FOOD

The School is committed to ensuring that no student remains without access to food during the school day.

Where a student lacks food, is unable to purchase food, or has food that does not comply with policy requirements, the School will provide appropriate support promptly and discreetly.

All cases are managed sensitively, recorded appropriately, and followed up with parents to ensure that student wellbeing is protected.

FOOD ALLERGIES AND SPECIAL DIETARY NEEDS

The School maintains an up-to-date allergy and dietary register and ensures that Individual Health Plans are implemented where required.

Relevant information is shared appropriately with staff and the canteen provider. Food sharing is discouraged, and staff are trained to recognise and respond to allergic reactions.

Emergency procedures are in place to ensure a timely and effective response to any incidents.

Food Service Provider (Slices)

The Food Service Provider shall ensure full compliance with the healthy food and nutrition guidelines established by Abu Dhabi Agriculture and Food Safety Authority and Abu Dhabi Department of Education and Knowledge, as outlined in their respective regulatory frameworks.

The provider is responsible for ensuring that all food items offered within the School premises meet approved nutritional standards, adhere to permitted food categories, and comply with all food safety, hygiene, and handling requirements. Regular monitoring and internal checks shall be conducted to maintain ongoing compliance.

Further details regarding the School's food service provider compliance, including SEHHI registration and oversight arrangements, are outlined in **Appendix A (A.3)**.

ADPHC SEHHI Platform Compliance

The School's appointed food service provider, Slices, is registered on and compliant with the Abu Dhabi Public Health Centre (ADPHC) School Environment Health and Hygiene Index (SEHHI) platform.



Slices maintains a valid SEHHI registration and fulfils all applicable food safety, hygiene, and inspection requirements in line with ADPHC and ADAFSA regulations.

The School verifies SEHHI compliance as part of its ongoing monitoring arrangements. Any observations, corrective actions, or regulatory updates communicated through the SEHHI platform are reviewed and addressed in coordination with the Health and Safety Officer and relevant school leadership.

CELEBRATIONS AND FOOD EVENTS

Celebrations are conducted in a controlled and inclusive manner, ensuring that student health and safety are not compromised.

Food sharing during birthdays is not permitted on school premises. Any items brought must be individually wrapped, halal, and nut-free, and are sent home unopened.

All food associated with school events must comply with halal requirements and nutritional standards. Red category foods are strictly prohibited.

Celebrations must be supervised, conducted in designated areas, and managed in a way that does not disrupt learning.

HYGIENE AND WASTE MANAGEMENT

The School maintains high standards of hygiene across all food-related areas.

Eating areas are kept clean and well-maintained, and waste is disposed of appropriately using designated facilities. Leftover food is not stored or redistributed.

Students are encouraged to follow appropriate hygiene practices, including handwashing before and after eating.

COMMUNICATION WITH PARENTS

The School maintains clear, consistent, and supportive communication with parents regarding food and nutrition expectations.

Parents are informed annually of policy requirements and are regularly reminded of key expectations, including halal compliance, allergy awareness, and healthy eating practices.



All communication is conducted respectfully and collaboratively, promoting partnership and shared responsibility.

Roles and Responsibilities

The effective implementation of this policy requires a collaborative and coordinated approach across the entire School community, with clearly defined roles and accountability at each level.

The Senior Leadership Team holds overall responsibility for ensuring compliance with ADEK and relevant authority requirements, including alignment with the Abu Dhabi Department of Education and Knowledge guidelines. Leadership is accountable for policy approval, resource allocation, periodic review, and ensuring that a healthy and safe school environment is consistently maintained.

Academic and Operational Teams are responsible for the day-to-day implementation of this policy. This includes monitoring student food consumption, supporting awareness initiatives, ensuring that school activities align with nutrition standards, and coordinating with relevant stakeholders to maintain compliance.

The Clinic Team supports the implementation of the policy by monitoring student health in relation to nutrition, including allergies and dietary needs. They provide guidance on healthy eating and contribute to awareness initiatives. Where necessary, they coordinate with parents and School staff to support students with specific nutritional concerns, while ensuring confidentiality at all times.

Health and Safety Officer is responsible for ensuring compliance with food safety, hygiene, and regulatory requirements. This includes conducting routine inspections of food areas, monitoring hygiene practices, ensuring proper waste management, and coordinating with external authorities when required.

Teaching and Support Staff are responsible for supervising students during meal and break times, reinforcing healthy eating habits, discouraging the consumption of restricted or “amber/red category” foods, and reporting any concerns related to food safety or student wellbeing.

Parent Relations Executive plays a key role in engaging with parents by communicating policy expectations, providing guidance on healthy lunchboxes, addressing concerns, and following up in cases of repeated non-compliance.



The Compliance Officer is responsible for monitoring adherence to the policy, maintaining records, supporting audits, and ensuring that all practices remain aligned with ADEK requirements and internal school standards.

Parents/Guardians are responsible for ensuring that food provided from home complies with the School's nutrition guidelines, including halal requirements and restrictions on unhealthy food items. Parents are expected to cooperate with the School and respond to guidance or communication when required.

Students are expected to follow School rules regarding food, make responsible and healthy choices, avoid bringing restricted items, and maintain cleanliness in eating areas. Students should also actively participate in promoting a healthy school environment.

Canteen and Food Service Providers (if applicable) must comply with approved menus, nutritional standards, and hygiene regulations. They are responsible for ensuring that only permitted food items are available, maintaining food quality, and supporting the School's healthy eating initiatives.

Monitoring and Compliance

The School ensures ongoing monitoring of food-related practices through regular supervision and basic review processes to maintain alignment with Abu Dhabi Department of Education and Knowledge guidelines.

Daily monitoring is primarily carried out by **teaching and assistant staff** during break and meal times. Staff observe student lunchboxes and eating behavior to ensure that restricted "amber/red category" food items are not brought or consumed. Any concerns are addressed immediately through simple guidance and reminders to students.

The **Health and Safety Officer** conducts periodic checks of the canteen, food handling practices, and general hygiene standards to ensure that minimum food safety requirements are maintained.

The **Compliance Officer** supports the process by maintaining basic records where required and ensuring that the policy is being followed in practice. Monitoring remains practical and focused on awareness rather than excessive reporting.

Non-compliance is managed through a simple and supportive approach:

- Students are guided and reminded of the School's expectations
- Parents are informed in case of repeated concerns



- Further follow-up is carried out only when necessary

POLICY REVIEW AND APPROVAL

This policy is reviewed annually or as required in response to regulatory updates.

The School remains committed to maintaining the highest standards of food safety, nutrition, and student well-being through continuous improvement and adherence to best practices.

Related Policies and Documents

This Food & Nutrition Policy should be read in conjunction with the following School/ GEMS policies and documents:

- Health and Safety Policy
- GEMS Food & Allergy Management Policy
- GEMS Food & Nutrition Policy
- GEMS Health Lunchbox Guidance
- Emergency Response Plan
- Student Welfare and Safeguarding Policy

Signed

Principal/CEO: Albertha Huyser

Date: 7 April 2026

Next policy review date: 7 April 2027



APPENDIX A – FOOD CLASSIFICATION, SEHHI COMPLIANCE & IMPLEMENTATION GUIDANCE

Appendix A – Overview

Item	Details
Appendix Title	Appendix A – Food Classification, SEHHI Compliance & Implementation Guidance
Linked Policy	GEMS Food & Nutrition Policy – GEMS Corporate
Purpose	To provide practical guidance, clarification, and regulatory confirmation supporting the effective implementation of the Food & Nutrition Policy
Applicability	Students, Staff, Parents, Food Service Providers, Contractors
Regulatory Alignment	ADEK, ADPHC, ADG-2, ADAFSA

A.1 Food Classification Framework by Food Group (ADPHC Model)

Food Group	Classification	Description	Examples (Indicative)
Fruits & Vegetables	Green – Encouraged	Nutrient-dense foods supporting growth, immunity, and digestion	Fresh fruits, raw or cooked vegetables, salads without high-fat dressings
Grains & Cereals	Green – Encouraged	High-fibre, complex carbohydrates supporting sustained energy	Brown bread, whole-grain pasta, oats, brown rice
Protein Foods	Green – Encouraged	Lean protein sources supporting growth and muscle development	Grilled or baked chicken, fish, eggs, legumes
Dairy & Alternatives	Green – Encouraged	Calcium-rich foods supporting bone health	Plain milk, unsweetened yogurt, natural cheese
Dairy & Alternatives	Amber – Limited	Permitted only in controlled portions due to added sugar or fat	Low-sugar flavoured milk, portion-controlled dairy desserts
Baked Snack Foods	Amber – Limited	Allowed only if meeting ADPHC / ADG-2 criteria	Portion-controlled baked snacks with reduced sugar and fat
Fats, Oils & Fried Foods	Red – Prohibited	High in saturated/trans fats and calories	Fried chicken, fries, samosas, deep-fried snacks
Sugary Foods & Desserts	Red – Prohibited	Low nutritional value, high sugar and fat	Cakes, donuts, chocolates (<50% cocoa), candy, ice cream



Beverages (Sugared / Caffeinated)	Red Prohibited	–	High sugar, caffeine, or artificial additives	Soft drinks, energy drinks, sweetened juices
Processed & Preserved Meats	Red Prohibited	–	High sodium and preservatives	Sausages, hot dogs, mortadella, salami
Foods with Artificial Additives	Red Prohibited	–	Contain artificial colours, flavours, sweeteners	Foods containing prohibited E-numbers or non-approved sweeteners
Non-Halal Foods	Red Prohibited	–	Not compliant with School halal requirements	Pork and pork derivatives, alcohol-based ingredients

A.2 Halal Compliance Requirements

Requirement Area	Expectation
Food brought from home	Must be halal-compliant
School canteen / vendors	Must be halal-certified and compliant
Events and celebrations	All food must be halal; non-halal items strictly prohibited
Enforcement	Non-compliant items are addressed immediately in line with School procedures

A.3 Food Service Provider – SEHHI Compliance

Area	Details
Appointed Provider	Slices
SEHHI Registration Status	Slices is registered on and compliant with the Abu Dhabi Public Health Centre (ADPHC) School Environment Health and Hygiene Index (SEHHI) platform
Compliance Scope	Food safety inspections, hygiene monitoring, corrective actions, regulatory documentation
Oversight	Monitored by the Health and Safety Officer and Compliance Officer
Regulatory Alignment	ADPHC, ADAFSA, ADEK



A.4 Packed Lunch Safety and Temperature Control

Aspect	Guidance
Food preparation	Packed lunches should be prepared hygienically and in line with food safety best practices
Temperature control	Insulated lunchboxes and appropriate cooling packs are recommended for perishable foods
High-risk foods	Foods requiring reheating or refrigeration are discouraged
School responsibility	The School may advise students not to consume food that appears spoiled or unsafe
Parent responsibility	Parents and guardians are responsible for ensuring food safety prior to school attendance

School Lunchbox Guidance

For our students, and the parents or guardians preparing their lunchboxes

This guidance promotes healthy eating habits among students by providing clear expectations for lunchbox contents. This information is aligned with the *ADEK Food and Nutrition Policy* and *GEMS Allergy Management Policy*, and supports the overall physical safety, health, growth, and concentration of students.

Guiding principles

1. Provide nutritious, balanced meals and snacks daily.
2. Encourage fresh, minimally processed foods.
3. Limit sugar, salt, and unhealthy fats in line with ADEK regulations.
4. Support lifelong healthy eating habits.

School responsibilities

- ✓ Teachers & staff will conduct lunchbox checks. Any prohibited items may be returned home.
- ✓ Compliance will also be reviewed during ADEK inspections.

Parent responsibilities

- ✓ Prepare age-appropriate, balanced lunchboxes daily.
- ✓ Engage children in healthy food choices.
- ✗ Never send prohibited food.
- ✗ Avoid sending money for outside food unless approved by school.

Prohibited 'Red List' Foods

The following are **strictly prohibited** from our school:

- ✗ Sodas, energy/sports drinks & other sugary drinks
- ✗ Processed and high-fat meats (eg. sausages, salami, hot dogs)
- ✗ Deep-fried foods (eg. fried chicken, fries, fast food items)
- ✗ High-sugar confectionery (eg. cakes, croissants, sweet pastries, candy)
- ✗ Any food containing artificial colorings, flavors, or sweeteners
- ✗ Any food containing nuts

Lunchbox composition

The following guidance aims to help parents and guardians prepare nutritious and balanced lunchboxes every day:

Fruits & vegetables	<ul style="list-style-type: none">✓ Minimum of 1–2 portions per day✓ Fresh fruit (eg. apple, banana, orange)✓ Cut vegetables (eg. cucumber, carrot sticks)✗ Avoid sugary juices
Whole grains	<ul style="list-style-type: none">✓ Whole wheat bread, chapati, brown rice, whole grain pasta, oats✗ Avoid refined flour products and white bread when possible
Protein sources	<ul style="list-style-type: none">✓ Boiled eggs, grilled chicken, tuna, beans/lentils, cheese (low-fat)✗ Avoid nut butters (eg. peanut butter, nutella)
Dairy	<ul style="list-style-type: none">✓ Low-fat milk, laban, yogurt (plain or low-sugar)✗ Avoid flavoured milks high in sugar
Healthy snacks	<ul style="list-style-type: none">✓ Unsalted pumpkin and sunflower seeds, homemade popcorn/baked items (low sugar)✗ Avoid chips, fried snacks, pastries, cakes, candies, nut-containing products
Beverages	<ul style="list-style-type: none">✓ Only water is allowed during school hours✓ Refillable water bottles encouraged✗ Avoid soft drinks, energy drinks, artificial juices

Here is a sample lunchbox:

Apple slices Carrot sticks Cucumber
Whole wheat sandwich Brown rice Oats
Grilled chicken Boiled egg Beans
Plain yoghurt Low-fat milk Water