The Food Foundation's response to the consultation on "School Food Standards: updating the legislative framework."

The school food standards consultation comes at a pivotal time for school food. In September 2026, universal breakfast clubs will be rolled out and all children in England from families receiving Universal Credit will be eligible for Free School Meals, benefiting over half a million additional pupils. The standards set now will play a pivotal role in shaping children's health and relationship with food for decades to come. Our detailed responses to each question are set out below, informed by that ambition.

You can find the government's initial proposals for updating the School Food Standards here: School Food Standards: updating the legislative framework

About the Food Foundation: The Food Foundation is an independent charity working to address challenges in the food system in the interests of the UK public. Working at the interface between academia and policymakers (parliamentarians, civil servants, local authorities, business leaders) we use a wide range of approaches to make change happen including events, publications, media stories, social media campaigns and multi-stakeholder partnerships. We also receive extensive direct input from the public to ensure their lived experience is reflected in our policy proposals. We collaborate with many partners on a range of different thematic areas, liaising with academics to generate evidence and campaigners who can drive change. We are independent of all political parties and businesses and are not limited by a single issue or special interest.

Section B: questions on the proposed updates to the School Food Standards

Breakfast and whole school day standards

10. To what extent do you agree with the new rules about which foods and drinks can be offered at breakfast clubs before the school day begins?

FF response = Strongly agree

Follow-on question to all answers: please explain why you answered in this way:

The proposed standards represent a strong, evidence-based approach to improving the nutritional quality of breakfast provision in schools. The emphasis on lower sugar options, higher fibre breads, and the inclusion of fruit or vegetables aligns well with UK dietary recommendations. Food Foundation data shows that fewer than 1 in 10 teenagers eat five portions of fruit and vegetables a day, while 95% consume above recommended levels of free sugar [4], highlighting the importance of these improvements, particularly in secondary schools.

The restriction of foods high in free sugars (e.g., chocolate spreads, syrups) and the removal of fried and highly processed items is appropriate given the well-established links between

excess sugar and saturated fat intake and poor health outcomes, including dental decay and obesity.

<u>Recommendation:</u> Create clearer guidance on pancakes, fried potato products, and baked beans.

We would like to see clearer guidance within the standards on pancakes e.g. ensuring that these are made with at least 50% wholewheat flour and toppings are healthier options only such as fruit and yoghurt, as this is a common food served in schools and is not clearly addressed.

Similarly, adding a clarifying statement to this standard 'fried potato products are not permitted' to explain this includes oven baked hashbrowns would be welcome to avoid confusion amongst schools.

<u>Recommendation:</u> Additionally, publish clearer definitions and examples of what constitutes "fruit spreads" and "savoury spreads" to support consistency across settings and reduce ambiguity for providers.

We are pleased to see the inclusion of beans in the allowable foods for breakfast provision. However, when we look at the most popular bean-containing dishes eaten in the UK, half of children's bean intake (50%) comes from baked beans. While baked beans might be considered a British classic, it demonstrates potential for a greater diversity of beans to be consumed [5], particularly as baked beans are generally high in sugar. This means that despite beans' strong nutritional profile, the way children are currently eating them is undermining much of their dietary benefit.

<u>Recommendation:</u> The revised Standards should seek to close this gap by actively encouraging a wider variety of bean and pulse dishes in schools, as well as develop guidance for caterers to source baked beans that are lower in sugar and salt, given that mass-produced baked beans typically contains a high amount of free sugars.

Similarly, the exclusion of processed meats reflects current public health guidance to reduce consumption of these foods. Food Foundation evidence shows that the most commonly eaten processed meat dishes in schools and educational institutions include but are not limited to ham, sausages, and sausage rolls [2].

<u>Recommendation:</u> Provide schools with a clear list of foods that are considered 'processed' to avoid confusion and ensuring this definition aligns with the NHS definition of processed meats [1].

Evidence from existing breakfast intervention programmes supports the practical delivery of the proposed breakfast standards. Prior to intervention, breakfast provision in many schools relied heavily on foods that would not meet the proposed standards, and staff often feared children would resist healthier breakfast options. In practice, these concerns rarely materialised, and schools successfully introduced and sustained healthier breakfast menus [3].

The programme also identified significant knowledge and implementation gaps among staff delivering breakfast provisions. In some cases, staff believed existing breakfast offers already met the standards despite serving pastries, honey, jam, and juice. Nourish found that schools benefited from practical guidance and staff training alongside menu changes [3].

<u>Recommendation:</u> Provide an equal amount of support and guidance for breakfast staff as is required for staff working across the rest of the school day

The inclusion of unsweetened, fortified dairy and plant-based alternatives in the standards is a particular strength, ensuring nutritional adequacy (e.g., calcium, iodine, vitamin D, B12) while supporting dietary diversity and inclusion. The proposed drinks standards, especially prioritising water and removing fruit juice and fruit-juice-based combination drinks from the list of permitted drinks, are also consistent with best practice.

<u>Recommendation:</u> Include fortified unsweetened pea milk to the list of permitted plant-based alternatives. Additionally, remove the proposed phased approach for secondary schools' drink standards and recommend the standards require water, milk and unsweetened plant-based milk alternatives only in secondary schools, to match the standard for primary, within the same timeframe (see response to question 18 and 19).

Overall, the standards are well aligned with current nutrition evidence and public health priorities, but successful implementation will depend on ensuring that meals remain appealing, accessible, and feasible for schools to deliver. Compliance with the breakfast standards should be included within any school food standards compliance package (see further responses to question 13 and 37).

[1] NHS, accessed 28 May 2026, Meat in Your Diet, https://www.nhs.uk/live-well/eat-well/food-types/meat-nutrition/
[2] The Food Foundation. (2025). Meat Facts: What meat is the UK eating and why does it matter? Available at https://foodfoundation.org.uk/sites/default/files/2025-05/TFF_Meat%20Facts.pdf
[3] School Food Matters (2026) Evaluation of the Nourish Programme. London: School Food Matters. Available at: https://www.schoolfoodmatters.org/sites/default/files/2026-01/N-report-DIGITAL.pdf
[4] The Food Foundation. (2026). The Broken Plate 2026. Available at: https://foodfoundation.org.uk/publication/broken-plate-2026
[5] The Food Foundation. (2025) *Bean Facts: Spilling the Beans — Why Beans, Peas and Other Legumes Are a Triple Win for Health, Environment and Affordability*. London: The Food Foundation. Available at: https://foodfoundation.org.uk/sites/default/files/2025-10/TFF_Beans%20Facts_DIGITAL.pdf

11. Do you think processed meat should be permitted to be served at breakfast?

<u>Recommendation:</u> Processed meat should not be permitted to be served at breakfast in school settings.

Breakfast provision in schools presents an important opportunity to establish healthy eating habits early in the day. Prioritising minimally processed, nutrient-dense protein sources (such as eggs, beans, and pulses, which are already included in the proposed standards) supports this aim while contributing fibre and other beneficial nutrients.

This proposal is consistent with current public health guidance, which recommends limiting processed meat consumption due to its association with adverse health outcomes [1] [2] [3] [4]. The World Cancer Research Fund recommends eating 'very little, if any' processed meat given its strong association with bowel cancer, with no safe level of consumption established. WHO IARC classifies processed meat as carcinogenic [10], and Cancer Research UK estimates it causes 13% of new bowel cancer cases in the UK annually [11]. Even small amounts carry risk: each additional 50g per day increases bowel cancer risk by around 18%. Furthermore, each additional 25g increases dementia risk by 44% [6] [2] [5].

Children eat proportionally more processed meat than adults – with over a third (36%) of meat eaten by children coming from processed meat (based on analysis of the NDNS waves 9-11) – making this a particular concern [7]. Additionally, three out of five of the meats most frequently eaten by children are processed (such as sausages, breaded chicken, and ham) [7], further demonstrating the extent to which processed meat is the default form of meat for many children.

Excluding processed meats also aligns with the wider direction of the proposed standards, which emphasise reducing foods high in salt, saturated fat, and additives. Maintaining consistency across food categories is important for clear messaging and implementation.

Restricting processed meat consumption also supports broader sustainability objectives. The independent National Food Strategy for England recommended a 30% reduction in UK meat consumption by 2032 in order to meet both climate and health goals [8], and the Climate Change Committee has recommended the UK reduce meat consumption by 25% by 2040 and 35% by 2050 to remain on track to meet climate targets [9]. Processed meat reduction offers the most health and environmental co-benefits.

Restricting processed meat should be combined with stronger procurement standards to support British farmers. The UK is a net importer of beef, veal, pork and chicken and a net exporter of lamb [7]. Just under a third (32%) of the red meat we import is processed, which – in addition to the health risks – meaning British livestock farmers who are at risk of being undercut by cheap imports of meat produced to lower standards than those maintained in the UK [7]. School food should be included in the Government Buying Standards for Food, which set environmental and welfare standards for public sector food.

Overall, not permitting processed meat is a proportionate and evidence-based approach that supports both short and long-term health outcomes.

[1] Salter, A. M. (2018). 'The effects of meat consumption on global health,' Revue Scientifique et Technique, 37(1), pp. 47–55. Available at: https:// pubmed.ncbi.nlm.nih.gov/30209430/
[2] World Cancer Research Fund. (2024). Meat and cancer. Available at: https:// www.wcrf.org/preventing-cancer/topics/meat-and-cancer/#processed-meat and-cancer

[3] NHS. (2023) Processed Food. Available at: https://www.nhs.uk/live-well/eat-well/how-to-eat-a-balanced-diet/what-are-processed-foods/
[4] Cancer Research UK (2025). Does processed and red meat cause cancer? Available at: https://www.cancerresearchuk.org/about-cancer/causes-of-cancer/diet-and-cancer/does-processed-and-red-meat-cause-cancer?utm_source=chatgpt.com
[5] Bouvard, V., Loomis, D., Guyton, K.Z., Grosse, Y., El Ghissassi, F., Benbrahim-Tallaa, L., Guha, N., Mattock, H. and Straif, K., on behalf of the International Agency for Research on Cancer Monograph Working Group. (2015). 'Carcinogenicity of consumption of red and processed meat', The Lancet Oncology, 16(16), pp. 1599–1600. Available at: https://www.thelancet.com/journals/lanonc/article/PIIS1470-2045(15)00444-1/fulltext
[6] Eating Better (2023). It's time to act on processed meat. Available at: https://eating-better.org/site/assets/files/6465/its_time_to_act_on_processed_meat_final-1.pdf
[7] The Food Foundation (2025), Meat Facts, Available from: https://foodfoundation.org.uk/publication/meat-facts
[8] National Food Strategy: Independent Review, The Plan, available at https://assets.publishing.service.gov.uk/media/61684fe3e90e071979dfec4a/national-food-strategy-the-plan.pdf
[9] Climate Change Committee (2025) The Seventh Carbon Budget: The UK's path to Net Zero 2038–2042. London: Climate Change Committee. Available at: https://www.theccc.org.uk/wp-content/uploads/2025/02/The-Seventh-Carbon-Budget.pdf
[10] World Health Organisation (2015), Cancer: Carcinogenicity of the consumption of red meat and processed meat, available at: https://www.who.int/news-room/questions-and-answers/item/cancer-carcinogenicity-of-the-consumption-of-red-meat-and-processed-meat
[11] Cancer Research UK, Does processed and red meat cause cancer? Available at: https://www.cancerresearchuk.org/about-cancer/causes-of-cancer/diet-and-cancer/does-processed-and-red-meat-cause-cancer

12. To what extent do you agree that honey should not be permitted?

FF response = Strongly agree

Follow-on question to all answers: please explain why you answered in this way:

Honey is classified as a free sugar and, from a nutritional perspective, has similar impacts to other sugars such as syrups and table sugar [1]. High intakes of free sugars are associated with an increased risk of dental cavities and excess energy intake, particularly in children [2] [3]. Therefore, excluding honey is consistent with the overall aim of the proposed standards to reduce free sugar consumption in school food environments.

Maintaining consistency in messaging is also important. Allowing honey while restricting other sources of free sugars could create confusion for both providers and children and young people and may undermine the intent of the standards. This will require clear communication to parents and pupils as there are widespread misconceptions that honey is healthier than other forms of sugar.

In practice, portion control of honey in breakfast club settings can be difficult to implement effectively. Evidence from school breakfast programmes has shown that limiting portions is

not consistently adhered to, which can lead to higher-than-intended sugar intake [4]. This practical challenge strengthens the case for a clear and simple approach that excludes honey altogether.

Overall, the exclusion of honey is aligned with current public health guidance and may be more effective and easier to implement than a portion-controlled approach.

[1] Raatz, S.K., Johnson, L.K. and Picklo, M.J., 2015. Consumption of honey, sucrose, and high-fructose corn syrup produces similar metabolic effects in glucose-tolerant and-intolerant individuals. *The Journal of nutrition*, *145*(10), pp.2265-2272.
[2] Mahboobi, Z., Pakdaman, A., Yazdani, R., Azadbakht, L. and Montazeri, A., 2021. Dietary free sugar and dental caries in children: A systematic review on longitudinal studies. *Health Promotion Perspectives*, *11*(3), p.271.
[3] Gibson, S., Francis, L., Newens, K. and Livingstone, B., 2016. Associations between free sugars and nutrient intakes among children and adolescents in the UK. British Journal of Nutrition, 116(7), pp.1265-1274.
[4] School Food Matters (2026) Evaluation of the Nourish Programme. London: School Food Matters. Available at: https://www.schoolfoodmatters.org/sites/default/files/2026-01/N-report-DIGITAL.pdf

13. To what extent do you agree with the proposed change to the structure of the standards with separate standards for the whole of the school day?

FF response = Agree

Follow-on question to all answers: please explain why you answered in this way:

<u>Recommendation:</u> We agree that breakfast should have standalone standards because it makes implementation and compliance significantly clearer.

Breakfast provision is often delivered by different providers and staff at lunchtime. Having clear, standalone standards that apply consistently helps to simplify monitoring and compliance, as providers do not need to cross-reference with lunch standards (for example, when considering restrictions on foods such as starchy items cooked in oil). This clarity is likely to support more effective implementation in practice.

Having standalone standards for breakfast is compatible with a whole school day approach to food, as schools can have consistent values and culture across the day while having operationally distinct standards for different settings [1]. Maintaining a whole-school-day approach to food standards is strongly supported from a public health and behavioural perspective. Children's dietary patterns are shaped by their overall food environment, and having consistent standards across the entire school day helps to reinforce healthy eating habits and avoid mixed messages. A whole-school-day approach also reflects how children actually eat in practice: food and drinks consumed across the day contribute cumulatively to energy and nutrient intake.

Where different sets of standards are operating, it is important that values are consistent and aligned with standards across all eating occasions. From an implementation perspective, a single, consistent framework is likely to be clearer and easier for schools and caterers to follow, reducing complexity and the risk of non-compliance. It also supports clearer communication with pupils and families. Evidence shows that where food standards and food culture were approached consistently across the whole school day, improvements in one setting often generated positive ripple effects elsewhere. In several schools, changes at breakfast prompted reviews of lunch provision and after-school food [1].

***Recommendation:* We urge the government to close the exemption to food provided at parties or celebrations including fundraising events, as well as school trips or any other events.**

This exemption is being used by food and drink companies (including doughnut and pizza brands) to market their products and brands to children, which is inconsistent with public health policy including the government's restrictions on HFSS promotions and advertising. We also urge the government to include guidance to schools that foods high in fat, salt or sugar should not be used to encourage and reward students in either primary or secondary schools.

Evidence has found that exemptions for rewards, celebrations and parties created genuine practical barriers to developing a consistent whole-school food culture [1]. Sweets and cakes were routinely used as classroom rewards and for birthdays, directly undermining wider food transformation work. Nourish supported schools to move away from these approaches (for example by replacing cake sales with alternatives such as homemade popcorn bags) demonstrating that healthier approaches are both achievable and positively received.

[1] School Food Matters (2026) Evaluation of the Nourish Programme. London: School Food Matters. Available at: https://www.schoolfoodmatters.org/sites/default/files/2026-01/N-report-DIGITAL.pdf

Increasing fibre | Starchy foods

14. To what extent do you agree with the proposed changes to the fibre requirements for starchy foods?

FF response = Agree

Follow-on question to all answers: please explain why you answered in this way:

We support proposals that increase the amount of fibre in school meals. The percentage of age groups not meeting fibre recommendations for 4- to 10-year-olds and 11- to 18-year-olds is 86% and 96%, respectively [3]. Fibre is critical for children, as it supports digestion and lowers the risk of chronic diseases, such as bowel cancer, thus setting children up for a longer, healthier lifespan [7].

<u>Recommendation:</u> Strengthen clarity on how the proposed 50% recommendation should be implemented in practice to remove potential loopholes in compliance.

The proposal that at least 50% of pasta and rice served should be brown, wholegrain, or white varieties with added fibre is ambiguous - it is unclear if it is 50% of menu items, 50% of days or both served mixed in the same meal and should be spelled out. The proposal has the potential to meaningfully increase fibre intake if loopholes are closed to ensure it leads to increased uptake of these foods. Brown rice contains substantially more fibre than white (around 3.2g per cup versus 0.6g [1]), and wholegrain pasta can contain two to three times the fibre of regular pasta (an extra 2–3g per 100g serving).

<u>Recommendation:</u> Mandate a bread fibre minimum of 4.2-4.7g /100g.

We agree that all bread should be a source of fibre. However, the fibre minimum for bread should align with the 50/50 white/whole meal threshold. This would mean mandating a fibre minimum of 4.2-4.7g /100g as opposed to the current 3g/100g suggested in the proposals.

The 3g/100g threshold would include some white breads: for example, currently Tesco's medium sliced white bread contains exactly 3g/100g of fibre [2], and ASDA 'Just Essentials' white is 3.2g/100g [3] so it could be argued the threshold should be higher. Tesco's whole meal equivalent [4] contains 6.3/100g and therefore contributes much more to a child's recommended intake. For a secondary school student, the recommended intake is 25g per day and therefore bread with 3g/100g of fibre would contribute less than 8% of their recommended intake in a two-slice portion.

We agree that starchy foods that are cooked using fat or oil (including during manufacture) should be served on no more than two meal occasions each week and only when they form part of a meal. The percentage of calories from saturated fat exceeds the recommended daily maximum of 10% among children from families of all income levels, with an average intake of 13.1% [5]. Recent Food Foundation data shows that 85% of 4–10-year-olds and 84% of 11–18-year-olds consume saturated fat well above government-recommended levels [8]. High saturated fat intake is linked to heart disease, stroke, and certain cancers in adults [6].

<u>Recommendation:</u> Further clarification is needed for the restrictions proposed on focaccia and ciabatta.

Focaccia is a feasible bread for schools to bake from scratch on site at scale and would be a healthier option than bought processed bread. We therefore recommend that focaccia is permitted as a bread option where it is cooked on site by schools using 50% whole meal flour. Ciabatta should also be permitted when this is not cooked with oil.

The acceptability of this by pupils will be critical to successfully increasing their fibre intake. For children less familiar with higher fibre starches, taste preferences will need to be developed. Therefore, recipe development and menu consultation with pupils will be required.

[1] Khalua, R.K., Tewari, S. and Mondal, R., 2019. P.997. Nutritional comparison between brown rice and white rice. Magnesium, 5, p.20.

[2] Tesco, accessed 28 May 2026, Tesco Medium Sliced White Bread 800g: https://www.tesco.com/shop/en-GB/products/299389116?_gl=1*18jbjh9*_up*MQ..*_ga*MTI4OTI3ODU4LjE3NzY4NjI2NzA.*_ga_H653QXESTP*czE3NzY4NjI2NzAkbzEkZzAkdDE3NzY4NjI2NzAkajYwJGwwJGgxMTE4MTkxODYz*_ga_33B19D36CY*czE3NzY4NjI2NzAkbzEkZzEkdDE3NzY4NjI3MDYkajI0JGwwJGg4NzQxOTM5NjI.
[3] Asda, accessed 28 May 2026, ASDA Just Essentials White Bread 800g: https://www.asda.com/groceries/product/white-bread/just-essentials-by-asda-just-essentials-white-bread-800g/3956734
[4] Tesco, accessed 28 May 2026, Wholemeal Medium Sliced Bread 800g: https://www.tesco.com/shop/en-GB/products/299425783?_gl=1*18jbjh9*_up*MQ..*_ga*MTI4OTI3ODU4LjE3NzY4NjI2NzA.*_ga_H653QXESTP*czE3NzY4NjI2NzAkbzEkZzAkdDE3NzY4NjI2NzAkajYwJGwwJGgxMTE4MTkxODYz*_ga_33B19D36CY*czE3NzY4NjI2NzAkbzEkZzEkdDE3NzY4NjI3MDYkajI0JGwwJGg4NzQxOTM5NjI.
[5] The Food Foundation (2025), Broken Plate, Available from: https://foodfoundation.org.uk/sites/default/files/2025-04/TFF_The%20Broken%20Plate%202025.pdf
[6] NHS (2026) How to get more fibre into your diet. Available at: https://www.nhs.uk/live-well/eat-well/digestive-health/how-to-get-more-fibre-into-your-diet/
[7] The Food Foundation. (2025) *Bean Facts: Spilling the Beans — Why Beans, Peas and Other Legumes Are a Triple Win for Health, Environment and Affordability*. London: The Food Foundation. Available at: https://foodfoundation.org.uk/sites/default/files/2025-10/TFF_Beans%20Facts_DIGITAL.pdf
[8] The Food Foundation (2026), Broken Plate 2026, Available from: https://foodfoundation.org.uk/publication/broken-plate-2026

Fruit and vegetables

15. To what extent do you agree with the requirement to serve a portion of vegetables and/or salad with all grab and go main meals?

FF response = Strongly agree

Follow-on question to all answers: please explain why you answered this way:

We strongly support the proposal to include a portion of vegetables and/or salad with all grab-and-go main meals as a practical step to improve their nutritional quality.

***Recommendation:* However, we recommend the government provide straightforward guidance on what an appropriate 'portion' of vegetables should amount to, with practical advice on how to implement this requirement for caterers, particularly in grab-and-go options, to ensure uptake, minimise food waste and support compliance.**

Data from the National Diet and Nutrition Survey shows that on average, children in the UK aged 11 to 18 years consume 2.8 portions of fruit and vegetables a day, and fewer than 1 in 10

(9%) meet the '5 A Day' recommendation. Mean consumption of 5 A Day portions by income quintile is lowest in the lowest income quintile and highest in the highest income quintile.[1] Parents support including more vegetables in school meals, with 75% saying they support the proposed increase in a recent poll conducted by Survation on behalf of Sustain [9].

***Recommendation:* We further recommend amending this requirement for both main meals and grab-and-go options to at least two servings of vegetables, as an accompaniment or as part of the main meal. The government should also provide clear guidance to schools on ways in which to ensure grab-and-go meal options are meeting the same nutritional standard as other meals.**

Grab-and-go options have become very popular in secondary schools. A 2025 survey of 2,000 secondary school students found that a third (32%) of students surveyed buy grab-and-go at morning break at least 3-4 times a week. It is even more popular at lunch, with 60% of students surveyed purchasing at least once a week and 40% at least 3-4 times per week. The dominance of grab-and-go disproportionately impacts students who receive free school meals (FSM):56% of students on FSM buy grab-and-go at least 3-4 times weekly, compared to 36% of students not on FSM. [2]

Grab-and-go is not inherently problematic and can play a positive role in busy school days. However, current provision often falls short of government recommendations for a balanced diet. Evidence from the Food Foundation's research with secondary school pupils found that FSM allowances and meal deal structures can unintentionally steer pupils towards less healthy options, as fruit, salads and healthier grab-and-go items were often less affordable or excluded from meal deals [11]. Students in the North West described grab-and-go bags containing a sandwich, drink and dessert such as a cookie, or hot options such as baguettes. [6] Menu analyses and interviews with school food stakeholders show that typical options are carbohydrate-based items such as pizza, sausage rolls, and chips. Only 1 in 3 students feel such meals provide sufficient energy to concentrate during lessons. [7]

Nonetheless, improving the grab-and-go offer is important, desired by students, and achievable. To be effective, vegetables should be incorporated in appealing, convenient formats as the preparation and presentation of vegetables plays a strong role in child acceptance. For example, overcooking vegetables and a lack of variety have been noted as barriers to vegetable uptake [10]. Case studies further demonstrate how this can work. For example, a two-day pilot at Launceston College overhauled the breaktime offer with freshly made vegetarian items priced at £1, including cauliflower wings, pea fritters, and noodle boxes; this led to record breaking gross income. [8]

***Recommendation:* School food governors should be encouraged to work collaboratively with school caterers and students to promote healthy innovation within the grab-and-go offer.**

An increase in vegetable provision needs to sit alongside wider considerations, including adequate lunch times, improving the canteen environment, and practical support for caterers around menu development and pupil engagement. Evidence suggests the school canteen environment often influences students to purchase grab-and-go busy, noisy dining halls

discourage students from selecting the main meal, whilst grab-and-go options allow students to maximise their social time outdoors with friends [4]. Canteen layouts mean healthier items are often less prominent, whilst visually appealing; high-calorie snacks are placed in high-traffic areas, for example at the till. [5]

Students cite long lunch queues, short lunchtimes, and the desire to participate in activities such as clubs and sport, as reasons to opt for quick, portable snacks [3]. The restrictive length of lunch breaks is a concern shared by caterers. The preference would be to provide a sit-down meal, as shorter lunch breaks are associated with less healthy options, and we would urge that steps are taken to make it easier for pupils to take up the sit-down meal, including guidance on managing lunch breaks and sharing good practice of schools implementing communal dining options. Guidance on longer lunch breaks would support the recommendation of increasing vegetable portions, by allowing students more time to eat it, even when they opt for grab-and-go.

***Recommendation:* Guidance should be provided to schools to review lunchtime design, including ensuring sufficient time for all year groups, staggered lunch periods where possible, and policies that do not disadvantage students who choose to sit down for a main meal (such as restrictions on taking hot food outside).**

***Recommendation:* The government should provide guidance for schools on meal pricing to ensure that healthy options are never more expensive than less healthy alternatives, and the healthier options are available within the free school meal allowance.**

[1] OHID (2025) National Diet and Nutrition Survey 2019 to 2023: report https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report
[2] Bite Back (2026). Quick, cheap and profitable: Who is benefitting from the rise in grab-and-go canteen culture at the expense of child health?
[3] Food Active (2024) Fuelling the Future: How does secondary school food fare for our young people? https://foodactive.org.uk/fuelling-the-future-how-does-secondary-school-food-fare-for-our-young-people/
[4] Devine, L.D. et al. (2023) 'Factors that influence food choices in secondary school canteens: a qualitative study of pupil and staff perspectives', Frontiers in Public Health, 11. Available at: https://doi.org/10.3389/fpubh.2023.1227075., McHugh, C. et al. (2021) 'Enablers and barriers English secondary schools face in promoting healthy diet and physical activity behaviours', Health Promotion International, 37(2), p. daab148. Available at: https://doi.org/10.1093/heapro/daab148.; Ryan, D., Holmes, M. and Ensaff, H. (2022) 'Adolescents' dietary behaviour: The interplay between home and school food environments', Appetite, 175, p. 106056. Available at: https://doi.org/10.1016/j.appet.2022.106056.; Woodside, J. et al. (no date) 'Opportunities for intervention and innovation in school food within UK schools', Public Health Nutrition, 24(8), pp. 2313–2317. Available at: https://doi.org/10.1017/S1368980020004668.
[5] Hart, C.S. and Page, A. (2020) 'The capability approach and school food education and culture in England: "gingerbread men ain't gonna get me very far"', Cambridge Journal of Education, 50(6), pp. 673–693. Available at: https://doi.org/10.1080/0305764X.2020.1764498.; Murphy, M. et al. (2021) 'Acceptability and

feasibility of strategies to promote healthy dietary choices in UK secondary school canteens: a qualitative study', BMC Research Notes, 14(1), p. 365. Available at: https://doi.org/10.1186/s13104-021-05778-3.
[6] Food Active (2024) Fuelling the Future: How does secondary school food fare for our young people? https://foodactive.org.uk/fuelling-the-future-how-does-secondary-school-food-fare-for-our-young-people
[7] Bite Back (2026). Quick, cheap and profitable: Who is benefitting from the rise in grab-and-go canteen culture at the expense of child health?
[8] Chefs in Schools (2024) Snack takeover success | Chefs in Schools. Available at: https://chefsinschools.org.uk/n-i/news/chefs-in-schools-snack-takeover/ (Accessed: 9 January 2026).; Davies, J. (2024) 'Launceston school joins initiative to transform child health through school food', Cornish and Devon Post, 3 December. Available at: https://www.thepost.uk.com/ (Accessed: 9 January 2026).
[9] Survation poll conducted on behalf of Sustain, online survey of English parents aged 18+ with children in primary and/or secondary education. Fieldwork conducted 5-12th May 2026. Sample size 1020.
[10] Nixon, N. (2025). Exploring models of school food procurement to optimise the quality of school meals for primary school children. University of York. [Online]. Available at: https://etheses.whiterose.ac.uk/id/eprint/38634/1/Nixon_Nicola_Final_Thesis.pdf
[11] The Food Foundation (2023) A Better Deal for Free School Meals. London: The Food Foundation. Available at: https://foodfoundation.org.uk/sites/default/files/2023-11/TFF_FSM%20Allowance_Report_FINAL.pdf

16. To what extent do you agree to the changes so that primary schools should have at least one day a week where fruit is the only dessert option?

FF response = Strongly agree

Follow-on question to all answers: please explain why you answered this way:

This proposal is strongly supported as a practical and proportionate measure to reinforce healthier dietary norms and contribute meaningfully to reducing free sugars intake and increasing fibre consumption among primary-aged pupils. Recent polling, conducted by Survation on behalf of Sustain, also found that two thirds of parents supported replacing sugary desserts with healthier alternatives like fresh fruit and yoghurt in school meals [3]

Recommendation: Provide implementation guidance emphasizing the importance of variety and presentation.

To be effective in practice, we recommend that these standards are supported with implementation guidance that emphasizes the importance of variety and presentation. Offering a rotating selection of seasonal fruits and presenting them appealingly (for example as fresh fruit salads or attractively displayed whole fruit) will be essential to maintaining pupil engagement and ensuring the proposal achieves its intended nutritional benefit rather than resulting in uneaten food. Schools should be encouraged to involve pupils in choosing which fruits are offered, supporting both uptake and the broader goal of developing positive relationships with fruit and vegetables from an early age.

Evidence supports the view that fruit-only dessert initiatives can be well received when introduced gradually and with pupil involvement [1]. Schools that trialled fruit-based dessert approaches found broad and sustained pupil support, and in one school a weekly "Fruity Fridays" initiative led to students increasingly choosing fruit on other days too, suggesting that regular exposure can help shift preferences over time. Pupil involvement in selecting and promoting fruit options, including through student food ambassadors, was identified as an important factor in sustaining uptake. Research conducted by The Food Foundation and FixOurFood has also found that less waste was observed in schools where fruit was served chopped, as opposed to serving it whole, highlighting the importance of presentation and accessibility in encouraging fruit consumption and reducing food waste [2].

***Recommendation:* Provide guidance to schools that they should specify that 50% of fruit should be sourced from local, sustainable British producers in their procurement tenders.**

This is in line with the government's ambitions that 50% of all public sector food be local or produced to high environmental standards. Food Foundation case studies also show that using fresh, locally sourced ingredients help contribute to uptake in school meals [4].

[1] School Food Matters (2026) Evaluation of the Nourish Programme. London: School Food Matters. Available at: https://www.schoolfoodmatters.org/sites/default/files/2026-01/N-report-DIGITAL.pdf
[2] McGinty, K., Nixon, N. and Oxley, R. (2026). The School Food Standards compliance pilot: A Yorkshire based case study. FixOurFood. [Online]. Available at: doi:10.5281/ZENODO.17550757 [Accessed 26 May 2026].
[3] Survation poll conducted on behalf of Sustain, online survey of English parents aged 18+ with children in primary and/or secondary education. Fieldwork conducted 5-12th May 2026. Sample size 1020.
[4] The Food Foundation. (2026) How the quality of school food can be improved to increase uptake. London: The Food Foundation. Available at: https://foodfoundation.org.uk/sites/default/files/2026-04/TFF_School%20food%20quality%20%26%20uptake_FINAL_0.pdf

Reducing sugar | Healthier drinks

17. To what extent do you agree to the proposed list of permitted drinks in primary schools?

FF response = Strongly agree

Follow-on question to all answers: please explain why you answered this way:

Restricting the permitted drinks list in primary schools is one of the most impactful proposals in the updated standards. Fruit juice accounts for a significant proportion of free sugars intake in primary-aged children, as evidenced in the consultation document, and removing them

from the school environment is a straightforward, evidence-based intervention. This approach is also supported by teachers, with a Teacher Tapp survey, commissioned by The Food Foundation, in May 2026 of more than 6,000 teachers finding that 64% of teachers support limiting drinks available to students to water and milk [6].

Establishing these habits during primary years is likely to generate lasting benefits, given the well-evidenced relationship between early dietary patterns and long-term health outcomes. Concerns that removing fruit juice will compromise children's micronutrient intake are not well-founded in the context of these proposals. The proposals to increase fruit and vegetable provision across meals and snacks will more than compensate for any micronutrients previously obtained from juice. Whole fruit and vegetables deliver those micronutrients without the accompanying free sugars and, therefore, consuming whole fruit is nutritionally preferable to juice. The proposals are likely to have wider benefits, including benefits to the environment by reducing the plastic waste generated by bottled drinks.

Concerns that children will become dehydrated if they don't like plain water is not well supported by the evidence. Children's drink preferences are largely shaped by what they are routinely offered, and if sweetened drinks are consistently unavailable at school, most children will drink water. This is borne out by experience in schools that have already moved to water-only policies. Work by the Greater London Authority on restricting sugary drinks in primary schools has already demonstrated that this approach is both practical and effective, and that children adapt readily when healthier options are consistently available. An evaluation of the Mayor of London's Water Only Schools initiative, which surveyed over 2,000 schools, found positive attitudes toward water-only policies amongst staff, parents, and students, with schools reporting a tangible shift in children's behaviours and attitudes toward water [2]. This was further reflected in observational data from 18 primary schools in Yorkshire where water served with meals was highly accepted by staff and children [5]. Recent polling found that 60% of parents support only water and milk (or unsweetened plant-based alternatives) in schools [4].

<u>Recommendation:</u> To aid roll out, there should be clear and proactive communication to parents about the rationale for this change.

Fruit juice is widely perceived as a healthy choice, as 150ml of fruit juice does count towards your 5 a day under NHS guidance. However, fruit juice contains high quantities of free sugars, with some fruit juice drinks currently sold in schools containing more than half the maximum recommended daily free sugar intake [3]. Government and schools will need to provide accessible, evidence-based messaging to explain the reasoning behind this change and manage the pushback that is likely to follow. Resources and template communications to support schools in having these conversations with families should be developed and made available ahead of implementation.

[1] London Assembly Health Committee (2019) *Keeping the Tooth Fairy Away: Child Dental Health Inequalities*. London: Greater London Authority. Available at: https://www.london.gov.uk/media/40390/download
[2] Yusuf, H. et al. (2025) '"I drink tap water as it is convenient and quick" – a mixed methods evaluation of water only school policies in London', *Health Education Research*. Available at: https://doi.org/10.1080/09581596.2025.2507228#

[3] See for example: https://www.radnorhills.co.uk/shop/radnor-fizz/sour-cherry/
[4] Survation poll conducted on behalf of Sustain, online survey of English parents aged 18+ with children in primary and/or secondary education. Fieldwork conducted 5-12th May 2026. Sample size 1020.
[5] McGinty, K., Nixon, N. and Oxley, R. (2026). The School Food Standards compliance pilot: A Yorkshire based case study. FixOurFood. [Online]. Available at: doi:10.5281/ZENODO.17550757 [Accessed 26 May 2026].
[6] Teacher Tapp Survation poll conducted on behalf of Food Foundation, online survey of teachers from primary and secondary education in England. Survey conducted 12th-14th May 2026. Sample size of 6,083 teachers.

18. To what extent do you agree to the proposed list of permitted drinks in secondary schools?

FF response = Disagree

Follow-on question to all answers: please explain why you answered this way:

Recommendation: Secondary school drinks standards should align with the proposals for primary schools, permitting only water, milk or plant-based milk alternatives that are unsweetened and fortified.

Consistency across primary and secondary schools ensures that the positive habits and preferences developed during primary school are maintained. Recent polling conducted on behalf of Sustain found this position supported by parents, with 73% saying the same food standards should apply to both primary and secondary schools [5].

The proposal to allow low-sugar drinks that can contain sweeteners is concerning given evidence of low compliance with current drinks standards [4]. It also contradicts the positive position across the rest of the standards to remove non-sugar sweeteners in all food and drink in primary school and food in secondary school. The WHO's 2023 guidance advises against non-sugar sweeteners as a tool for improving health outcomes in children, noting potential undesirable effects from long-term use [1]. SACN also recommends a long-term goal should be to limit non-sugar sweeteners consumption. This is recognised in the proposals regarding food and therefore, permitting drinks containing non-sugar sweeteners in secondary schools is inconsistent [2].

Government should also ensure that restricting the drinks list is accompanied by funding for water fountain installation and maintenance, and that access to free, fresh drinking water is subject to regular external monitoring by an appropriate inspection body. Despite being a legal requirement, Food Foundation research found that students were unable to access free drinking water easily in their schools due to water fountains being broken or the location of the water fountain not being in locations that were easily accessible. Where jugs of water were available in the lunch hall, students found that they could not trust them to be clean, so they did not use them [3]. Dehydration is a risk if water is not genuinely accessible, convenient, and appealing throughout the school day. This is why investment in well-maintained, clean, easily accessible water fountains and refill stations is essential, not optional. A child who has to

queue, hunt for a working fountain or drink from an unpleasant tap will avoid drinking water regardless of what else is on offer. This is where government resource and external monitoring of water provision becomes critical.

Furthermore, reliance on bottled drinks can have a disproportionate impact on students who receive free school meals, as spending on bottled drinks in the eventuality of an unreliable free water supply directly reduces what they can afford to buy to eat.

The School Food Review engaged with caterers as part of a series of roundtable discussions about school food standards and school meal funding and found that many caterers had concerns about the impact of reduced drink sales in secondary schools, where drinks represent a major source of revenue. However, on balance the impact on child health and the environment overrides this commercial concern.

[1] World Health Organisation. (2023). Use of non-sugar sweeteners: WHO guidelines. Available from: https://www.who.int/publications/i/item/9789240073616
[2] OHID (2025). SACN statement on the WHO guideline on non-sugar sweeteners: summary. Available from: https://www.gov.uk/government/publications/sacn-statement-on-the-who-guideline-on-non-sugar-sweeteners/sacn-statement-on-the-who-guideline-on-non-sugar-sweeteners-summary
[3] The Food Foundation (2023) A Better Deal for Free School Meals. London: The Food Foundation. Available at: https://foodfoundation.org.uk/sites/default/files/2023-11/TFF_FSM%20Allowance_Report_FINAL.pdf
[4] Pallan, M. et al. (2024) 'School food policy in secondary schools in England and its impact on adolescents' diets and dental health: the FUEL multiple-methods study', Public Health Research, 12(12), pp. 1–167. Available at: https://doi.org/10.3310/TTPL8570.
[5] Survation poll conducted on behalf of Sustain, online survey of English parents aged 18+ with children in primary and/or secondary education. Fieldwork conducted 5-12th May 2026. Sample size 1020.

19. To what extent do you agree with the approach to introduce healthier drinks in secondary schools in stages?

FF response = Disagree

Follow-on question to all answers: please explain why you answered this way:

***Recommendation:* The standards introduced for drinks in secondary schools should fully align with the primary school standards.**

Allowing hot chocolate and flavoured milks in secondary schools during a phasing-in period undermines other standards that do not permit use of chocolate or confectionery, removal of honey elsewhere, and alignment in reducing sugar overall. We would therefore strongly advise against this.

Moreover, phased introduction undermines the progress on healthier drink choices and habits for primary school students who will benefit from the new drinks standards in primary schools in 2026, but would then move to the looser, phased standards in secondary schools where such drinks were still allowed in 2027.

The final permitted drinks list for secondary schools should be made consistent with primary school standards, which means removing sweetener-containing drinks. Unless these standards are aligned, phasing simply delays an inadequate outcome rather than delivering a genuinely healthier one. There is a risk that a phased approach becomes a permanent compromise rather than a stepping stone to best practice.

20. Do you have any views on whether drinks standards for secondary schools should be the same as, or different from, those for primary schools?

***Recommendation:* Secondary school drinks standards should ultimately align with primary standards.**

The nutritional rationale for restricting sugary and sweetener-containing drinks does not weaken with age, and maintaining a more permissive secondary list creates an unjustifiable distinction that is hard to defend on public health grounds. Given that primary school pupils will have had no exposure to sweetener-containing drinks throughout their primary education under these new standards, allowing them at secondary level risks undermining habits built during those primary years.

Aligning the standards with primary schools is likely to have wider benefits on the environment by reducing plastic waste generated by bottled drinks.

Dairy and plant-based options

21. To what extent do you agree with the proposed changes to the dairy and plant-based requirements?

FF response = Agree

Follow-on question to all answers: please explain why you answered in this way:

We agree with the proposed changes as they support improved nutritional standards and greater inclusivity through the recognition of plant-based alternatives.

Maintaining a requirement for daily milk provision ensures that pupils continue to have access to a reliable source of essential nutrients, while allowing flexibility through plant-based drinks provides schools with greater inclusivity.

The inclusion of plant-based alternatives alongside dairy is a positive step, as it supports pupils with different dietary needs and preferences, including those who are lactose

intolerant, vegan, or from cultural backgrounds where dairy consumption is lower. We suggest adding fortified unsweetened pea milk alternatives to the list of permitted plant-based alternatives. Requiring these products to be fortified with key micronutrients such as calcium, iodine, vitamin D, riboflavin, and vitamin B12 is particularly important to ensure nutritional equivalence with dairy options.

The proposed reduction in sugar thresholds for yogurt products is also welcome. Setting clear limits for both dairy and plant-based options will also help reduce children's intake of free sugars.

Reducing foods higher in fat, sugar and salt

Foods higher in fat, sugar and salt

22. To what extent do you agree with the new rules restricting foods high in fat, sugar, and salt?

FF response = Agree

Follow-on question to all answers: please explain why you answered in this way:

The proposed restrictions are well-evidenced and long overdue. Current dietary data shows children are consuming far more saturated fat and sugar than recommended, significantly increasing their lifetime risk of cardiovascular disease, type 2 diabetes, and obesity [1]. Limiting deep-fried foods, processed meats, batter-coated items, and pastry-based products aligns directly with SACN guidance and will meaningfully reduce exposure to these nutrients during a critical period of dietary habit formation.

Rebalancing the school food environment away from foods associated with excess sugar, saturated fat and salt intake, is crucial in ensuring every child gets the fuel they need to thrive. Creating a healthier food environment is also important for supporting schools' wider educational objectives, including pupil concentration, behaviour and engagement in learning. A recent survey of 6,000 teachers commissioned by The Food Foundation and carried out by Teacher Tapp found that 80% of teachers polled in both primary and secondary schools agreed that unhealthy food consumed at school, such as sugary drinks and food high in sugar and far, led to disruptive behaviour in the classroom [16]. Additionally, over 85% of the teachers believe reducing highly processed foods in school meals will improve pupil health [13].

The UK government recommends that no more than 5% of energy comes from free sugars. Overall, less than 1 in 10 children (9%) meet the recommendation, with an average intake of 10.5% of energy for children. The recommendation is that the population average contribution of saturated fats to energy intake should be no more than 10%; only 16% of children meet it. [2] Currently, one in three children leave primary school experiencing obesity [3].

Evidence from schools across England indicates that foods high in fat, sugar, and salt are regularly available in canteens. Observations have identified the sale of packaged crisps and confectionery products from well-known brands while menu analysis and testimony from young people indicates that fried products, processed meats, and cheese-based products are served frequently. [4,5,6]

<u>Recommendation:</u> We would like to see guidance for schools to ensure that healthy options are never more expensive than less healthy alternatives: testimony from secondary school students suggests that healthier options, particularly fruit, are often more expensive than cakes, cookies, or sugary drinks.

<u>Recommendation:</u> The standards should make it clear that any restrictions on the number of times a food item is offered apply across the whole school day.

The standards should require that where a restricted item, such as a batter coated or breadcrumb coated product, is sold at both breaktime and lunchtime on the same day, this should count as two of the permitted weekly servings. Without specifying this, there is a risk that restricted items are served and resold at every meal while maintaining compliance, which would undermine the intent of the restrictions.

Strengthening these restrictions is important, but the impact will heavily depend on consistent monitoring and enforcement. Evidence shows secondary schools struggle to implement and monitor compliance with the current school food standards (SFS), with the greatest challenges relating to restrictions on food and drink high in fat, salt, and sugar. A recent assessment of compliance at 36 secondary schools across the school day, found that only 6% of schools met the current standard banning confectionery, chocolate and chocolate-coated products, 17% complied with the restriction on cakes and biscuits outside lunchtime, and just 11% met the limit on deep-fried, batter-coated or breadcrumb-coated foods. [7]

Separate 2025 research found that some schools were serving highly processed foods and sugary desserts based on assumptions about what pupils would accept [11], despite evidence that improving food quality can increase uptake, from 28% to as high as 90% [12].

<u>Recommendation:</u> Highly processed plant-based alternatives that are high in fat, salt and sugar should be added to the list of foods restricted to one serving per week (or no more than two combined across the week).

We strongly support increasing plant-based options on school menus (see response to question 31 below), but standards need to ensure that these prioritise whole, minimally processed plant-based options. The nutritional profile of plant-based meat alternatives varies widely [8,9]. We urge OHID and DfE to consider how to categorise the HFSS plant-based products included in this restriction, considering both their nutritional composition and product category, and what is practical and implementable for caterers.

Children in the UK are consuming too much salt, and the evidence is clear that this raises blood pressure in children and adolescents, establishing risk factors for life-long health problems, such as cardiovascular disease [14]. A preference for salty food is shaped by repeated early exposure [15], meaning that school meals which routinely feature high-salt

foods are actively reinforcing harmful taste preferences. We therefore encourage stronger language around salt reduction in school food standards, including guidance on discretionary salt use during cooking. Catering resources should also promote flavour-building through herbs, spices, garlic, and citrus rather than additional seasoning.

***Recommendation:* Secondary schools should not have phased implementation, and should need to meet the standards in September 2027, the same as primary schools.**

Evidence from the UK Sugar Reduction Programme shows that extended voluntary timelines can have limited impact [10]. We believe a one-year implementation period would better reflect the government's ambition to create the healthiest generation of children ever.

[1] OHID (2025) National Diet and Nutrition Survey 2019 to 2023: report https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report
[2] OHID (2025) National Diet and Nutrition Survey 2019 to 2023: report https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report
[3] NHS Digital. (2025). National Child Measurement Programme, England, 2024/25 School Year
[4] Bite Back (2025). Fuel Us, Don't Fool Us: An investigation into Big Food in schools.
[5] Bite Back (2021) Spill the Beans https://biteback.contentfiles.net/media/documents/Spill_the_Beans_School.pdf
[6] Bite Back (2026). Quick, cheap and profitable: Who is benefitting from the rise in grab-and-go canteen culture at the expense of child health?
[7] Pallan, M. et al. (2024) 'School food policy in secondary schools in England and its impact on adolescents' diets and dental health: the FUEL multiple-methods study', Public Health Research, 12(12), pp. 1–167. Available at: https://doi.org/10.3310/TTPL8570.
[8]] The Food Foundation (2024), Rethinking plant-based meat alternatives, https://foodfoundation.org.uk/sites/default/files/2024-08/Rethinking%20Plant-Based%20Meat%20Alternatives.pdf,
[9] Espinosa S. N. et al. (2026), Plant-based analogues to meat and dairy for sustainable food systems, Proc Nutr Soc, 2026 Feb 16:1-12. doi: 10.1017/S0029665126102237 https://pubmed.ncbi.nlm.nih.gov/41693439/
[10] Office for Health Improvement & disparities (2022), Sugar reduction programme: industry progress 2015 to 2020 https://www.gov.uk/government/publications/sugar-reduction-programmeindustry-progress-2015-to-2020
[11] Nixon, N. (2025). Exploring models of school food procurement to optimise the quality of school meals for primary school children. University of York. [Online]. Available at: https://etheses.whiterose.ac.uk/id/eprint/38634/1/Nixon_Nicola_Final_Thesis.pdf
[12] The Food Foundation. (2026), How the quality of school food can be improved to increase uptake. London: The Food Foundation. Available at: https://foodfoundation.org.uk/sites/default/files/2026-04/TFF_School%20food%20quality%20%26%20uptake_FINAL_0.pdf
[13] Teacher Tapp Survation poll conducted on behalf of Food Foundation, online survey of teachers from primary and secondary education in England. Survey conducted 14th May 2026. Sample size of 6,059 teachers.

[14] Action on Salt. (2026), Salt and Children. Available at: https://www.actiononsalt.org.uk/salthealth/salt-and-children/
[15] National Library of Medicine. (2016), Shifting human salty taste preference: Potential opportunities and challenges in reducing dietary salt intake of Americans. Available at: https://pmc.ncbi.nlm.nih.gov/articles/PMC4593321/
[16] Teacher Tapp Survation poll conducted on behalf of Food Foundation, online survey of teachers from primary and secondary education in England. Survey conducted 12th May 2026. Sample size of 6,670 teachers.

23. To what extent do you agree with the new rules restricting the serving of cheese?

FF response = Agree

Follow-on question to all answers: please explain why you answered in this way:

Cheese is a significant source of saturated fat in children's diets. Limiting it as a main ingredient to no more than two days per week is a proportionate and practical measure. It still allows cheese to feature as a topping or accompaniment, preserving flexibility for caterers while reducing saturated fat load across the week.

24. To what extent do you agree with the plan to restrict the serving of cheese as a main protein option in secondary schools, in stages?

FF response = Agree

Follow-on question to all answers: please explain why you answered in this way:

The phased approach for secondary schools (three portions per week from September 2027, reducing to two from September 2028) gives caterers adequate time to develop appealing alternatives without disrupting service, while still delivering the nutritional benefit of the full restriction within a clear timeframe.

Reducing desserts

25. To what extent do you agree with the plan to reduce desserts in primary schools?

FF response = Strongly agree

Follow-on question to all answers: please explain why you answered in this way:

Limiting sweetened baked goods and desserts to once per week in primary schools is strongly supported by the evidence on free sugars intake in children. Primary-aged children are at a key stage for establishing taste preferences and eating patterns. Replacing sugary desserts with

fruit and lower-sugar dairy options on other days provides a genuine opportunity to shift norms around sweetness and improve overall diet quality.
The latest National Diet and Nutrition Survey shows that only 8% of primary pupils meet the free sugars guidelines. Sweet biscuits, cakes, and puddings make up 19% of free sugars intake in primary school aged children. [1]

***Recommendation:* It should be made clear to schools and caterers that the once-a-week limit on desserts is a maximum, rather than a requirement; moving towards fruit and fruit and yogurt only policies, where supported by children, parents, and staff, should be encouraged.**

[1] OHID (2025) National Diet and Nutrition Survey 2019 to 2023: report
https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report

26. To what extent do you agree with the plan to reduce desserts in secondary schools?

FF response = Strongly agree

Limiting sweetened baked goods and desserts to once per week in secondary schools is strongly supported by the evidence on free sugars intake in children. The latest National Diet and Nutrition Survey shows that only 5% of secondary pupils meet the free sugars guidelines. Sweet biscuits, cakes, and puddings make up 16% of free sugars intake in secondary school aged children. [1]

***Recommendation:* Schools should be actively supported to co-design menu changes with students as dessert reductions are introduced.**

However, it should be noted that secondary schools present distinct challenges in implementing dessert reductions that are not present in primary settings. Research by School Food Matters and the University of Birmingham that looked at barriers and enablers to delivering a whole-school approach to food in secondary schools found that pupils at this age have greater autonomy over food choices and are more strongly influenced by the food environment outside of school, making them more likely to disengage from school meal provision if changes feel imposed. Evidence from secondary schools found that pupils are significantly more likely to accept and sustain new food norms when they have had a genuine role in shaping them, with one student reflecting that changes were something "we helped create." [2] One case study in a London secondary school showed that by getting pupil feedback on menu items, uptake increased and waste decreased, which improved the school's finances despite them using higher quality ingredients [3].

[1] OHID (2025) National Diet and Nutrition Survey 2019 to 2023: report
https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report
[2] School Food Matters and University of Birmingham (2026) Whole School Approaches to Food in Secondary Schools: Available at:

https://www.schoolfoodmatters.org/sites/default/files/2026-04/Nourish-Secondaries-summary-report.pdf
[3] The Food Foundation. (2026) How the quality of school food can be improved to increase uptake. London: The Food Foundation. Available at: https://foodfoundation.org.uk/sites/default/files/2026-04/TFF_School%20food%20quality%20%26%20uptake_FINAL_0.pdf

27. To what extent do you agree with the plan to reduce desserts in secondary schools in stages?

FF response = Neither agree nor disagree

Follow-on question to all answers: please explain why you answered in this way:

While faster change is preferable for public health, the phased implementation (two portions per week from September 2027, reducing to one from September 2028) is a reasonable concession to the operational realities of secondary school catering. It avoids a cliff-edge change while maintaining a clear trajectory toward a healthier standard. From a behaviour change perspective, gradual reformulation also tends to be better tolerated by pupils, reducing the risk of disengagement from school meal provision

Meal deals

28. To what extent do you agree with the plan to set what can and can't be included in a school meal deal?

FF response = Strongly agree

Follow-on question to all answers: please explain why you answered this way:

Requiring meal deals to include at least one portion of vegetables or salad and one portion of fruit, while excluding drinks, is an improvement to current practice. This proposal ensures that the convenience and affordability of a meal deal works in favour of nutritional quality rather than against it.

The exclusion of drinks from the meal deals also means that children will not have to waste money on drinks, but it is critical that free water is available and accessible to children. This is not always the case in schools currently, despite being a legal requirement [2]. This issue will need to be addressed particularly to ensure that children on Free School Meals, who are often reliant on meal deals, are not disadvantaged and left at risk of dehydration.

<u>Recommendation:</u> Schools should be required to provide healthy menu items that are available to pupils with the Free School Meal allowance to ensure that the most vulnerable students are able to afford nutritionally balanced food at school.

Research conducted by The Food Foundation and FixOurFood in seven schools in Yorkshire found that in order to be able to afford a main course, sweet item and a drink, many students on Free School Meals have to get a meal deal [1]. Although individual salads or pots of fruit were sometimes available in the schools researched, they were not included as part of the meal deal, and with the Free School Meals allowance, it wasn't possible to buy them in addition to the meal deal [1]. This is a way in which the Free School Meals allowance may be restricting access to healthy options for students under the current Standards [1].

<u>Recommendation:</u> The government should provide guidance and support to schools and caterers to support them in designing meal deals that are appealing, with meaningful involvement from pupils.

[1] Food Foundation (2023) *A Better Deal for Free School Meals*. London: The Food Foundation. Available at: https://foodfoundation.org.uk/sites/default/files/2023-11/TFF_FSM%20Allowance_Report_FINAL.pdf
[2] Department for Education (2023) *School Food in England.* Available at: https://www.gov.uk/government/publications/standards-for-school-food-in-england/school-food-in-england

Protein changes | Pulses

29. To what extent do you agree with the changes being suggested for pulses being included alongside main menu items at least once every week?

FF response = Strongly agree

Follow-on question to all answers: please explain why you answered this way:

Requiring pulses to be included within or alongside all main menu options at least once a week is a welcome proposal with strong nutritional justification.

<u>Recommendation:</u> Require that a portion of pulses be included within or alongside all main meals at least three times per week.

However, we believe this should be strengthened to require a portion of pulses within or alongside all main meals at least three times per week, whether as a blended ingredient, side dish, dip, or sandwich filling. This aligns with several international food based dietary guidelines that recommend the consumption of at least three portions or servings of pulses and beans [1].

Pulses are nutrient-dense, high in fibre, low in saturated fat, and a good source of plant-based protein and iron. They also support broader public health goals, as diets low in beans and pulses are associated with up to 9,000 premature deaths in the UK every year and are a known contributor to longer, healthier lives [1]. It is therefore important to promote the consumption of beans and pulses from an early age, helping to establish dietary habits that contribute to lifelong health and lower chronic disease risk.

Requiring a portion of pulses to be served at least three times a week gently normalises pulse consumption among children who may have limited exposure to them at home, supporting longer-term healthy eating habits. Evidence from the Food Foundation shows that secondary school aged children (11-18 years) eat the smallest amount of beans across all age groups, the equivalent of just 2/3 of a portion of beans consumed a week. In contrast, primary school aged children eat on average the largest amount of beans a week, at 1.2 portions a week [1].

***Recommendation:* To support the implementation and compliance with this recommendation, the government must define clearly what a minimum portion of pulses is, and what an appropriate ratio is for blended dishes.**

To support the successful implementation of this recommendation, and to enable pulses to be served as frequently as possible, we would suggest that the guidance allows for flexibility in individual portion sizes within blended dishes, provided that pupils receive the equivalent of at least three portions of beans or pulses across the course of a week. This approach would enable schools and caterers to incorporate pulses in a variety of ways, including through blended dishes, without compromising on the overall nutritional targets set out in the recommendation.

Beans in particular are a critical source of key micronutrients. Children eating less than one portion of beans per week are also 47% more likely to be below the LRNI for potassium, 58% more likely for magnesium, 30% more likely for zinc and 20% more likely for iron [2]. Additionally, the percentage of age groups not meeting fibre recommendations for 4- to 10-year-olds and 11- to 18-year-olds is 86% and 96%, respectively. [1] Fibre is critical for children, as it supports digestion and lowers the risk of chronic diseases, such as bowel cancer, thus setting children up for a longer, healthier lifespan [1 and as half a can of beans contains roughly 25% of the daily recommended intake of fibre (and lentils provide almost 33%) [11], eating more beans could close this nutrient gap.

Haricot, lentils, chickpeas, and kidney beans dominate UK bean consumption, contributing to 90% of total bean consumption for children [1]. However, as noted in question in 10, half of children's bean intake (50%) comes from baked beans which are often high in sugar and salt [1].

***Recommendation:* Guidance should be provided to schools and caterers to support with sourcing of beans which are lower in salt and sugar, in addition to guidance on ways to integrate a wide range of beans and pulses into menus.**

Beans and pulses can be successfully introduced onto school menus in a variety of ways, beyond just resorting to the use of baked beans, including in popular dishes by blending into sauces, supported by engagement with the staff and students to ensure acceptability and confidence. [3] For example, FixOurFood recently delivered tasting workshops using menus designed by ProVeg to substitute meat with beans and pulses. Preliminary observations (unpublished) from five Bradford primary schools indicate that the meals were well received by pupils, and a number of dishes have since been adopted as permanent menu items [4].

In interviews conducted by Veg Power, school caterers reported success through blending and 'hiding' beans and pulses in many of their dishes, including cottage pie, chickpea brownies, beef and bean burgers, and spaghetti bolognese – all of which were well received by students [5]. Blending dishes is already widely used by large contract caterers, and the cost and carbon savings have been documented. ISS trialled a 70:30 beef-to-lentil blend across over 250 UK primary schools in 2022, rolling it out in dishes such as cottage pie and spaghetti bolognese, and found it delivered a triple benefit of improved nutrition, reduced environmental impact, and around 30% lower production costs [6].

[1] The Food Foundation. (2025) *Bean Facts: Spilling the Beans — Why Beans, Peas and Other Legumes Are a Triple Win for Health, Environment and Affordability*. London: The Food Foundation. Available at: https://foodfoundation.org.uk/sites/default/files/2025-10/TFF_Beans%20Facts_DIGITAL.pdf
[2] Office for Health Improvement and Disparities (2025) *National Diet and Nutrition Survey 2019 to 2023: Report*. London: Department of Health and Social Care / Food Standards Agency. Available at: https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-2019-to-2023/national-diet-and-nutrition-survey-2019-to-2023-report
[3] Food Foundation. (2026) How the quality of school food can be improved to increase uptake. London: The Food Foundation. Available at: https://foodfoundation.org.uk/sites/default/files/2026-04/TFF_School%20food%20quality%20%26%20uptake_FINAL_0.pdf
[4] Early findings from FixOurFood research, details available on request,
[5] Interviews conducted with caterers by VegPower, 2026, further details available on request.
[6] CoolFood. (2026) Making plant-rich dishes work: Practical solutions from food service operators. Available at: https://coolfood.org/wp-content/uploads/2026/03/Making-Plant-Rich-Dishes-Work.2.pdf#gf_6

30. To what extent do you agree with the plan to increase pluses in secondary schools in stages?

FF response = Agree

The phased implementation for secondary schools (requiring pulse inclusion every two weeks from September 2027, increasing to weekly from September 2028) is a sensible approach.

Secondary school menus, particularly grab-and-go offerings, present greater recipe development challenges than primary school provision, concerns which have been raised by caterers. A transitional period therefore allows catering teams adequate time for training and support to implement these changes, and to formulate, trial and embed dishes that incorporate pulses in ways that are nutritionally effective and acceptable to older pupils.

This reduces the risk of both food waste and disengagement from school meal provision during the changeover. The integrity of the ultimate requirement of weekly pulse inclusion across all menu options is not compromised by this approach, provided the phasing is treated as a firm transitional measure.

This is consistent with evidence from secondary school food transformation work, which found that strong catering team involvement and adequate time for recipe development are essential conditions for embedding new ingredients successfully, particularly within grab-and-go formats where pulse inclusion presents greater practical challenges than in sit-down provision [1].

[1] School Food Matters and University of Birmingham (2026) Whole School Approaches to Food in Secondary Schools: Findings from the Nourish Programme. London: School Food Matters. Available at: https://www.schoolfoodmatters.org/sites/default/files/2026-04/Nourish-Secondaries-summary-report.pdf

Protein

31. To what extent do you agree with the changes being suggested for protein in school menus?

FF response = Strongly agree

Follow-on question to all answers: please explain why you answered this way:

The proposed updates to protein requirements represent a well-evidenced and timely modernisation of the standards. Expanding the qualifying protein sources to include pulses alongside meat and poultry enhances nutritional quality as well as menu flexibility. Pulses are high in fibre and low in saturated fat, which are nutrients where children's intakes are not currently meeting recommendations, making them a nutritionally superior complement or partial substitute for meat-based proteins in the context of children's overall dietary patterns.

The requirement for vegetarian menu options to feature pulses as the primary protein source on at least three days per week is particularly positive. Current vegetarian school meal options frequently rely heavily on cheese, which is high in saturated fat. This proposal directly addresses that imbalance and strengthens the nutritional integrity of the vegetarian offer.

Increasing beans and pulses on menus is also a cost-effective shift. Beans and pulses provide a low-cost, nutrient-rich source of protein. Analysis undertaken in 2024 by the Food Foundation found that beans cost on average 2.6 times less per 100g than meat and 4.5 times less per 100g than other plant-based alternatives [1]. Recent interviews conducted by Veg Power with school caterers revealed an interest among catering providers in increasing the use of beans in school menus, citing their affordability and low cost [10]. Their inclusion in meals can support healthier menus while helping caterers control costs, with the potential to generate savings [11] [12]. Standards should also ensure that plant-based meals are as affordable as the meat option.

The reclassification of fresh tuna as a non-oily fish brings the standards into alignment with current UK dietary guidelines, reflecting the fact that fresh tuna does not contain levels of long-chain omega-3 fatty acids comparable with oily fish such as salmon and mackerel. This is an important correction that improves the accuracy and credibility of the standards.

Recommendation: ***The standards on protein should go further and require that a plant-based protein be served every day, provided that these are minimally processed and not-HFSS (and therefore falling into the restrictions for HFSS foods, see response to question 22).***

This plant-based option could include pulses (already mandated three times a week as a vegetarian option). As well as supporting environmental goals, a daily plant-based option supports cultural and religious inclusivity. Ensuring the nutritional quality of plant-based options would be critical. The nutritional profile of plant-based meat alternatives varies widely [2,3]. Priority should be given to whole foods such as nuts, pulses and beans, and criteria for this category should consider composition and preparation rather than only product category.

Recommendation: ***The restriction on meat alternative products (marketed as such) to no more than two portions per week should be accompanied by clear guidance and a list on what this category includes to ensure that compliance can be adequately assessed, including whether 'homemade' versions are exempt.***

We welcome guidance that encourages the use of minimally processed plant-based proteins such as pulses, tofu, and mycoprotein in preference to highly processed manufactured alternatives.

Recommendation: ***To help boost the culturally appropriateness of menus in schools as well as menu variety, we suggest that the list of exemptions also include tempeh and seitan, which are popular products in non-Western cultures such as in Southeast Asia and provide strong nutritional benefits [2].***

Where whole food ingredients (e.g., beans, pulses, vegetables, grains) are used and these are cooked from scratch on site by caterers e.g., homemade vegetarian burgers or sausages, these should be permitted without restrictions.

Recommendation: ***Set a limit is set on how much red meat can be served per week to no more than twice per week.***

This limit is due to the links between red meat and several negative health outcomes including cancer and cardiovascular disease [4], as well as the environmental impact of red (and other) meat production, including driving greenhouse gas emissions and biodiversity loss [5]. The independent National Food Strategy recommended a 30% reduction in UK meat consumption by 2032 in order to meet both climate and health goals [6], and the Climate Change Committee has recommended the UK reduce meat consumption by 25% by 2040 and 35% by 2050 to remain on track to meet climate targets [7].

The National Diet and Nutrition Survey data shows that whilst adults are slightly reducing their consumption of red and processed meat, children are increasing theirs, with 22% of boys aged 11 to 18 years old eating above the recommended safe levels of red and processed meat (90g) a day [8]. This consumption also exceeds the Eat Lancet Commission's Planetary Health diet recommended maximum of 43g of meat a day (no more than 14g of red meat and 29g of white meat) in order to keep the impact of the food system within sustainable planetary boundaries [9].

[1] The Food Foundation (2025), Bean Facts: Spilling the beans: why beans, peas and other legumes are a triple win for health, environment and affordability. Available: https://foodfoundation.org.uk/sites/default/files/2025-10/TFF_Beans%20Facts_DIGITAL.pdf
[2] The Food Foundation (2024), Rethinking plant-based meat alternatives, https://foodfoundation.org.uk/sites/default/files/2024-08/Rethinking%20Plant-Based%20Meat%20Alternatives.pdf,
[3] Espinosa S. N. et al. (2026), Plant-based analogues to meat and dairy for sustainable food systems, Proc Nutr Soc, 2026 Feb 16:1-12. doi: 10.1017/S0029665126102237 https://pubmed.ncbi.nlm.nih.gov/41693439/
[4] World Health Organization (WHO) (2015) Cancer: Carcinogenicity of the consumption of red meat and processed meat. Available at: https://www. who.int/news-room/questions-and-answers/item/cancer-carcinogenicity-of-theconsumption-of-red-meat-and-processed-meat
[5] World Wildlife Fund (2024) LivingPlanetReport2024.Availableat:https:// livingplanet.panda.org/en-GB/
[6] National Food Strategy,(2021),The Plan ,Available: https://www.nationalfoodstrategy.org/
[7] Climate Change Committee (2025) The Seventh Carbon Budget: The UK's path to Net Zero 2038–2042.London:ClimateChangeCommittee. Available at: https:// www.theccc.org.uk/wp-content/uploads/2025/02/The-Seventh-Carbon-Budget.pdf
[8] The Food Foundation, 2025, UK still failing to meet basic dietary guidelines, available: https://foodfoundation.org.uk/news/uk-still-failing-meet-basic-dietary-guidelines
[9] EAT-Lancet Commission.(2019). Summary report of the EAT-Lancet Commission on Food, Planet, Health. Available at: https://eatforum.org/content/uploads/2019/07/EAT Lancet_Commission_Summary_Report.pdf
[10] Interviews conducted with caterers by VegPower, 2026, further details available on request.
[11] CoolFood. (2026) Making plant-rich dishes work: Practical solutions from food service operators. Available at: https://coolfood.org/wp-content/uploads/2026/03/Making-Plant-Rich-Dishes-Work.2.pdf#gf_6

Schedule 5 - nurseries

32. To what extent do you agree with maintained nursery schools and nursery units within primary schools having to comply with the EYFS nutrition guidance only?

FF response = Agree

Overall question

33. To what extent do you think the proposed changes will improve the nutritional quality of school meals?

FF response = To a great extent

The proposed changes have strong potential to meaningfully improve the nutritional quality of school meals. However, the extent to which improvement is realised will depend significantly on what accompanies the standards.

Evidence shows that standards alone are insufficient to drive lasting change. School staff frequently lack awareness of how existing standards should be applied in practice, and the gap between what was required and what was served was significant [1]. We recommend updated standards be accompanied by practical tools (including menu audits, simple templates, and clear guidance) and that compliance be externally monitored rather than left to self-assessment alone.

[1] School Food Matters (2026) Evaluation of the Nourish Programme. London: School Food Matters. Available at: https://www.schoolfoodmatters.org/sites/default/files/2026-01/N-report-DIGITAL.pdf

Section C: practical considerations

Implementing new standards

34. What practical challenges, if any, do you think schools might encounter when implementing the new School Food Standards?

Lunchtime logistics present a significant structural barrier. Many schools, particularly secondary schools, have insufficient time allocated to lunch and inadequate capacity to manage queuing efficiently. If pupils cannot access a meal within the time available, the nutritional quality of what is on offer becomes irrelevant. The length of lunch breaks is a concern shared by caterers and parents. Implementation of the new standards must be accompanied by broader consideration of how lunchtime is organised, including queue management, service point design and the length of the lunch break itself.

Maintaining school meal uptake must be treated as a priority throughout implementation, as a drop in uptake is a concern shared across the school food sector, including by caterers. The nutritional benefits of the new standards will only be realised if pupils are actually eating school meals. Poorly managed transitions risk alienating pupils and driving them toward less regulated food options outside school. Implementation support should therefore include guidance on how to introduce changes gradually and palatably, and how to monitor and respond to changes in uptake, as demonstrated by The Food Foundation's case studies of schools, which consistently found that careful and deliberate introduction of new ingredients and dishes, alongside active pupil involvement, maintained or increased meal uptake rather than reducing it [2].

To support schools with implementation, we recommend a number of considerations alongside publication of the new standards:

1. Practical guidance will be critical. Schools and caterers will need detailed, accessible support on how to meet the new requirements in practice including recipe ideas, menu

planning tools, procurement advice, and guidance on interpreting the standards in ambiguous situations. Without this, there is a significant risk of inconsistent implementation across settings.

2. Communication with parents and pupils will require careful management. Government should provide schools with clear, evidence-based communication resources to explain the rationale for the changes in accessible language, taking into account common misconceptions, particularly around fruit juice and sweeteners.

3. Pupil involvement in menu design is essential to maintaining and growing school meal uptake. Young people are more likely to accept and enjoy new menu items if they have had a meaningful role in shaping them. Case studies show this has worked well for a number of schools and has contributed to meal uptake [2]. Schools should be actively encouraged and supported to co-design menus with pupils, particularly when introducing less familiar ingredients such as pulses and wholegrains. Activities such as hosting tasting sessions when introducing new menu items should be deployed.

4. Special dietary requirements will need careful handling. Clear guidance is needed on how schools should apply the standards for pupils with allergies, intolerances, medical conditions, SEND needs, and those from cultural or religious backgrounds with specific dietary requirements. The standards must be implemented in a way that is genuinely inclusive and does not inadvertently disadvantage or exclude any group of pupils.

5. Securing better procurement. Recent evidence suggests that many primary and secondary school leaders perceive the current school food procurement system, particularly for smaller schools, as prioritising cost over quality. Stakeholders reported that a fragmented procurement landscape, combined with limited oversight and transparency, can make it more difficult for schools to meet school food standards and deliver higher-quality meals consistently [1]. Procurement also presents a clear opportunity for salt reduction. Foods high in salt that are regularly served in schools should be required to meet the government's 2024 salt reduction targets, bringing the School Food Standards into alignment with standards already set through the Government Buying Standard for Food and Catering.

In addition, funding for school food needs to be periodically reviewed, particularly for small schools and caterers who do not benefit from economies of scale in the same way that larger schools and caterers do. Recent analysis estimates 10,000 schools are likely to face a shortfall between funding and delivery costs to make school meals work [3]. Funding must be sufficient to support head teachers, business managers and their catering partners.

We recommend targeted financial support for smaller schools in the short term, specifically an annual fixed grant of £7,000 for the 10,000 schools with 225 pupils or fewer, alongside consideration of a funding model that combines a fixed school-level allocation with a per-pupil payment [3]. This would help ensure that all schools can deliver nutritious meals and comply with the updated standards regardless of size [1].

[1] Nixon, N. (2025). Exploring models of school food procurement to optimise the quality of school meals for primary school children. University of York. [Online]. Available at: https://etheses.whiterose.ac.uk/id/eprint/38634/1/Nixon_Nicola_Final_Thesis.pdf
[2] Food Foundation. (2026) How the quality of school food can be improved to increase uptake. London: The Food Foundation. Available at: https://foodfoundation.org.uk/sites/default/files/2026-04/TFF_School%20food%20quality%20%26%20uptake_FINAL_0.pdf
[3] The Food Foundation, 2026, Getting school food funding right: Why September 2026 matters, available: https://foodfoundation.org.uk/news/getting-school-food-funding-right-why-september-2026-matters

Compliance

35. To what extent do you agree that schools having a governor with responsibility for school food would help ensure schools follow the School Food Standards?

FF response = Strongly agree

36. To what extent do you agree that schools publishing their school food policy on their website would help ensure they meet the School Food Standards?

FF response = Strongly agree

37. What practical methods do you think schools could take to help ensure they meet the School Food Standards?

Effective compliance requires a coherent system of governance, accountability, and support working together at school level.

The following recommendations form an integrated framework to achieve this:

1. First, governance is a crucial foundation. We support every school appointing a lead governor or trustee with designated responsibility for school food, publishing a school food policy, and reporting annually on school food activities. These structures create formal ownership and establish clear lines of accountability at school level. Schools should also appoint a student School Food Ambassador, responsible for ensuring that pupil feedback on school quality is fed back to school leaders, governors, and caterers.

Evidence shows that governor involvement is a significant factor in sustaining food improvements: in one school, a lead governor helped secure capital investment in the dining environment that would not otherwise have been possible [1]. A named governor or trustee helps embed school food within formal school accountability structures and creates clear ownership of school food at governance level, rather than treating it solely as an operational issue. However, the evaluation also found that many governors were unaware of their existing

statutory duties in relation to school food. A Teacher Tapp survey commissioned by The Food Foundation, conducted in May 2026, found that out of 1,640 senior leaders, only 3% noted they have a governor responsible for food or nutrition at their school [2]. A named governor is only meaningful if they are trained and supported. The proposal should therefore be accompanied by clear guidance and practical training resources for governors, with food governance and school food policy publication included within Ofsted's routine checks.

2. As part of their routine inspections and checking of school governance and policy transparency, Ofsted should be required to specifically check that school food governance structures are in place as part of this

3. Annual reporting of school food policies and governance structures should be made a condition of school food grant funding.

4. External verification is essential to ensure governance structures are taken seriously rather than treated as a paperwork exercise. Evidence supports the importance of combining self-assessment with external support. When schools were expected to lead their own audits without additional support, progress was slower and staff reported feeling overwhelmed. The most effective approach combined practical tools (including menu audits, templates, and clear guidance) with external support and shared ownership across staff teams, helping schools sustain improvements over time rather than treating compliance as a one-off exercise [1].

5. Introduce a national school food audit scheme delivered through Environmental Health Officers, providing independent verification across all settings.

6. Schools should be required to use a standardised self-reporting compliance tool to verify their menus against the standards. Compliance checking addresses the separate, but important, question of whether the standards are actually being met in what children are served day to day. For example, there have been instances where the published menus included healthier options and were compliant, but in practice what was offered included additional fried foods or pastry products [3]. These findings highlight the importance of robust monitoring to ensure that school food policies are implemented consistently and that the food served to children, not just the published menus, are compliant with the standards. The combination of self-assessment and independent audit ensures broad coverage without placing a disproportionate burden on any single school.

7. Schools should be required to use a recognised quality assurance scheme.

8. School Food Improvement Officers should be introduced in every local authority to provide hands-on support.

9. Introduce mandatory training across the whole school food workforce.

10. Accreditation and support are also essential to ensure that when gaps are identified, schools have the resources and knowledge to address them, and without these

support mechanisms, accountability and compliance risk becoming punitive rather than genuinely effective.

[1] School Food Matters (2026) Evaluation of the Nourish Programme. London: School Food Matters. Available at: https://www.schoolfoodmatters.org/sites/default/files/2026-01/N-report-DIGITAL.pdf
[2] Teacher Tapp Survation poll conducted on behalf of Food Foundation, online survey of teachers from primary and secondary education in England. Survey conducted 12th May 2026. Sample size of 1,640 teachers.
[3] Nixon, N. (2025). Exploring models of school food procurement to optimise the quality of school meals for primary school children. University of York. [Online]. Available at: https://etheses.whiterose.ac.uk/id/eprint/38634/1/Nixon_Nicola_Final_Thesis.pdf

38. What practical methods do you think government could take to help ensure schools meet the School Food Standards?

We set out below our key recommendations for practical measures the government could take to support schools in meeting the School Food Standards:

Guidance and resources: Government should develop clear, practical implementation guidance in collaboration with caterers, nutritionists, and school food professionals, rather than producing top-down documentation that does not reflect operational realities. This should include definitions where necessary (such as processed meat), recipe banks and menu planning tools specifically aligned to the new standards, making it as straightforward as possible for catering teams to build compliant menus without requiring specialist nutritional expertise. Recent interviews with school caterers highlighted a gap in awareness about beans and underscored the need for educational initiatives aimed at parents, children, and schools to understand their benefits [4]. Template communications for parents and pupils should be provided to support schools in explaining the changes accessibly and consistently, with guidance for schools on how to communicate changes e.g., including photos of new meals and listing ingredients clearly. Dedicated guidance on managing special dietary requirements, allergies, cultural and religious needs, and SEND-related exceptions is essential to ensure inclusive implementation. All materials should be available in plain English and accessible formats for non-specialist staff.

Funding: Adequate and sustained funding is a prerequisite for successful implementation. Research into the true cost of school meal provision found a gap of 63p per meal between the true cost of delivering a nutritious, sustainable school lunch (£3.16) and the funding available at the time of the study (£2.53) [1]. It is important to note that better food does not always mean higher costs: improvements in procurement, skills and menu design can deliver quality within existing budgets, and many caterers are already demonstrating this. However, funding must be sufficient to make implementation realistic.

Government should consider funding for kitchen upgrades and equipment including maintenance of drinking water infrastructure. Particularly, targeted support should be made available for small schools, which disproportionately lack the economies of scale and in-

house capacity available to larger settings and multi-academy trusts [3]. Regardless of the update to the Standards, the current school meals funding model should be streamlined to ensure the money in the system is most effectively distributed, and per-meal funding must be linked to inflation to ensure it remains realistic over time. Analysis from the Energy and Climate Intelligence Unit warns that UK food prices could be 50% higher by November 2026 than they were at the start of the cost-of-living crisis in 2021, meaning food inflation will have risen almost four times faster than in the previous two decades [3]. This trajectory shows that linking funding to inflation is necessary and urgent. Without it, the value of school food budgets will continue to shrink just as the new standards demand more of them.

Training and workforce: Training should be made available for both catering staff and lead governors for school food. Governors in particular will need practical support to understand the standards and fulfil their accountability role meaningfully. Chefs and caterers should have access to continuing professional development that builds skills around the new requirements, including wholegrain cookery, pulse-based dishes, and lower-sugar menu design.

Engagement: Young people should be meaningfully involved in the national rollout of the new standards, including in the development of guidance materials and communications. Schools that are already delivering high quality, nutritious food should be identified and supported to share their approaches, with government facilitating networks and platforms for peer learning and best practice exchange. Government also needs to ensure effective communication with parents and provide guidance to schools on how to communicate the new proposals and their benefits to parents. Recent polling found that 45% of parents were not aware of the School Food Standards at all and until the polling 50% did were not aware of the consultation on the new proposals [2]. This suggests that currently communications around School Food Standards are failing to reach parents and need to be improved.

Structural: Government should review lunchtime length and organisation in schools, recognising that the nutritional quality of school food cannot be realised if pupils do not have sufficient time to access and eat a meal. This is supported by school caterers, who noted the benefits of a longer lunchtime on the uptake of school meals [4]. The expansion of free school meals to children from households in receipt of Universal Credit is strongly welcomed but must be accompanied by a clear commitment to quality as well as quantity, ensuring that the increase in uptake does not place unsustainable pressure on catering teams or dilute the standards being introduced.

[1] School Food Matters and Impact on Urban Health (2024) Calculating the Cost of a Nutritious, Sustainable School Lunch. London: School Food Matters. Available at: https://www.schoolfoodmatters.org/sites/default/files/2024-10/CoaSM-report.pdf
[2] Survation poll conducted on behalf of Sustain, online survey of English parents aged 18+ with children in primary and/or secondary education. Fieldwork conducted 5-12th May 2026. Sample size 1020.
[3] The Food Foundation, 2026, Getting school food funding right: Why September 2026 matters, available: https://foodfoundation.org.uk/news/getting-school-food-funding-right-why-september-2026-matters
[4] Interviews conducted with caterers by VegPower, 2026, further details available on request.

Culture, equality and diversity

39. What concerns, if any, do you have about the potential impact of these proposals on all individuals with protected characteristics?

Socio-economic background: Overall, the proposed changes could have e a positive impact on children from disadvantaged backgrounds, who are most reliant on school food as a primary source of daily nutrition and who have the highest rate of diet-related ill health, making them the group with the most to gain from well-implemented reforms. Recent evidence shows that healthy life expectancy is at its lowest level since 2013-2015, with a nearly 20-year gap between the least and most deprived areas [5]. This is reflected in the views of teachers, with a recent Teacher Tapp survey commissioned by The Food Foundation highlighting that nearly 90% of teachers in schools serving the most deprived areas believe that school plays an important role in ensuring students from disadvantaged backgrounds have access to healthy food while at school [4]. The extension of free school meals and the improvement of nutritional standards together have the potential to be a significant opportunity for an equity intervention. However, this potential will only be realised if implementation is adequately resourced. Currently, the most deprived fifth of households with children would need to spend 85% of their disposable income to afford a government-recommended diet [5], underscoring that school food cannot be an afterthought for this group.

Recommendation: Equity impact should be placed at the center of implementation planning, with particular attention to ensuring that free school meal provision keeps pace with the cost of meeting the new standards.

The needs and experiences of children from lower-income backgrounds should be at the center of any changes to the school food system. It must be ensured that food across the school day, including lunchtimes, is equitable and changes do not have unintended consequences for young people who have the most to gain from school meals. Increased fruit and vegetable provision and reduced sugar and saturated fat would ensure those children are meeting nutritional thresholds for two of their meals a day and will benefit all pupils regardless of background but could particularly help address the inequalities in consumption of healthier foods.

Changes across the school day must prioritise those in receipt of free school meals, particularly as meal deal pricing is often set to match the free school meal allowance, and when done well can offer good value for those from lower income households. Changes to meal deals including what is available/included and pricing must not lead to increase inequalities between children on paid for meals and those with free school meal allowances. Free school meal students must have the same range of choice, options, and autonomy as their peers when it comes to food options across the school day.

Cultural inclusivity:

<u>Recommendation:</u> Provide schools with clear guidance on how to ensure compliant menus remain culturally inclusive.

The increased emphasis on pulse-based dishes may be welcomed by many communities where pulses are a dietary staple. All communication materials relating to the changes should be made available in accessible formats and multiple languages to ensure families from all backgrounds can engage with them. Evidence also highlights significant gaps in catering to cultural and faith-based dietary needs, with over half of parents noting their children would be more likely to eat the meals if they better reflected what was eaten at home [6]. This shortfall disproportionately affects Black and minoritised ethnic communities, who are also more likely to be living in poverty and facing intersecting disadvantages. Children following faith-based diets further reported limited choice and repetitive meal options [6]. As a result, some families were not fully benefiting from the free meals policy, as they needed to supplement school lunches with additional food from home [6].

Disability and SEND: Children with sensory processing difficulties, autism, or highly restricted diets may find transitions to wholegrain foods, alternative proteins, and reduced-sugar options particularly challenging. The texture, appearance, and taste of wholegrain alternatives, and attempts to 'hide' food in dishes, can be significant barriers for this group.

<u>Recommendation:</u> Provide clear guidance on reasonable adjustments and exceptions to the standards is essential and must ensure children's entitlements to food that meets their needs are met, and schools should be supported to work with children, families and nutritionists to ensure no child is left without an acceptable meal.

Evidence from the Adapt-Ed study found that access to preferred or "safe" foods can be crucial for children's sense of security and mental health, and that poorly managed experiences with school food can negatively affect eating both at school and at home [2]. A blanket approach to implementing the standards without appropriate flexibility risks excludes some of the most vulnerable children from school food altogether and could lead to dangerous consequences for their overall health and wellbeing. The Adapt-Ed study also found low uptake of free school meals in special schools, despite children with SEND being significantly more likely to be FSM-eligible, underscoring the importance of inclusive implementation. Practical approaches that have supported children with SEND include gradual food transitions, maintaining familiar foods during menu changes, sensory activities outside of mealtimes, ensuring pupils know what to expect, and providing a range of ways for them to make informed choices and provide feedback.

Recent guidance on reasonable adjustments in accessing free school meals [1] needs further clarification on which pupils these apply to, ensuring that schools are able to meet dietary needs and restrictions, whilst providing them with the support they need to enable all students able to take up a school meal to do so. The government should develop dedicated evidence-based guidance on implementing the standards in SEND settings, recognising the need for flexibility around sensory needs, safe foods, and eating environments, and publish this as part of DfE's implementation resources.

<u>Recommendation:</u> Address a critical data gap on uptake of free school meals to monitor the impacts of these changes on sub-groups including those with SEND.

There are currently no published data showing how many children with SEND in mainstream schools are receiving their entitlement: uptake in these settings could be even lower than in special schools, and the standards could have uneven impacts.[3]

Age: Secondary pupils have greater autonomy and stronger established food preferences than younger children and are more likely to disengage from school meal provision if changes feel imposed or unappealing.

***Recommendation:* Require meaningful involvement of young people in menu design and in the communication of changes is essential to maintain uptake among this age group, particularly among older pupils who may have easier access to food outside school.**

[1] Department for Education, (2026), Free school meals: guidance for local authorities, local - authority-maintained schools, academies and free schools. Available: https://www.gov.uk/government/publications/free-school-meals-guidance-for-schools-and-local-authorities/free-school-meals-guidance-for-local-authorities-local-authority-maintained-schools-academies-and-free-schools
[2] O'Connell, R., Denyer, L., Holford, A., Hamilton, L. and O'Brien, C. (2025) *Improving School Food for Children with SEND: Policy Brief*. University of Hertfordshire. Available at: https://openresearch.nihr.ac.uk/articles/5-50
[3] O'Connell R, Ludlow A, Holford A et al. Adapt-Ed: co-designing adaptations to a whole school intervention to improve the uptake and impact of food provision in special schools – scoping research for a future trial [version 1; peer review: 2 approved with reservations]. NIHR Open Res 2025, **5**:50 (https://doi.org/10.3310/nihropenres.13897.1)
[4] Teacher Tapp Survation poll conducted on behalf of Food Foundation, online survey of teachers from primary and secondary education in England. Survey conducted 12th May 2026. Sample size of 6,642 teachers.
[5] The Food Foundation. (2026). The Broken Plate 2026. Available at: https://foodfoundation.org.uk/publication/broken-plate-2026
[6] Impact on Urban Health. (2024). More than a meal: An independent evaluation of universal primary free school meals for children in London. Available at: https://urbanhealth.org.uk/wp-content/uploads/2024/11/IoUH-Free-School-Meals-Report.pdf

Environmental principles

40. Do you think the new School Food Standards could have any positive and/or negative effects on the environment?

FF response = Positive

Follow-on question to all answers: please explain why you answered this way

The proposed changes to the School Food Standards are likely to have a net positive environmental impact, though this will depend significantly on how implementation is managed in practice.

The shift toward greater consumption of pulses, wholegrains, fruit and vegetables, and the reduction in processed meat, represents a meaningful move toward more plant-forward menus. Plant-based foods generally have a substantially lower carbon footprint than meat and dairy products, and beans especially have a vastly smaller carbon footprint relative to animal products. 1.8 kilograms of GHGEs are emitted on average globally when producing a kilogram of beans, in comparison to 99 kilograms of GHGEs emitted on average globally when producing a kilogram of herd beef [1].

The proposed flexibility for schools to substitute pulses for some meat and poultry provision may also create opportunities to source higher-welfare, seasonal and locally produced ingredients, supporting shorter supply chains and reducing food miles. This aligns well with the broader food strategy being developed by DEFRA and could contribute to government environmental commitments if procurement guidance actively encourages sustainable sourcing.

***Recommendation:* Make it mandatory for school food to comply with Government Buying Standards.**

Realising environmental benefits will require active intent. The current School Food Standards do not require compliance with Government Buying Standards, representing a significant missed opportunity. The government has committed to ensuring that at least 50% of public sector food is sourced locally or to high sustainability and environmental standards, and the school food system is critical to achieving this ambition. Enforcing Government Buying Standards within school food procurement would ensure that the environmental potential of the new standards is translated into practice, benefiting schools, society and the wider economy while minimising environmental harm.

The reduction in heavily processed foods, including deep-fried items, processed meats, drinks and confectionery, may also reduce packaging waste associated with individually wrapped and manufactured products. Food Foundation research found that the individual drinks provided as part of the meal deal in 2023 resulted in excessive amounts of plastic that typically weren't recycled after use [2]. The promotion of tap water as the default drink option could therefore provide further environmental benefits by reducing reliance on single-use plastic bottles, provided schools have access to clean, reliable, and well-maintained drinking water infrastructure.

One potential short-term negative effect worth acknowledging is an increase in food waste during the transition period, as pupils adapt to less familiar ingredients and menu changes. However, this is likely to diminish as familiarity increases and as schools invest in pupil engagement and menu co-design. Government guidance on managing the transition should explicitly address food waste minimisation strategies to mitigate this risk.

[1] The Food Foundation. (2025) *Bean Facts: Spilling the Beans — Why Beans, Peas and Other Legumes Are a Triple Win for Health, Environment and Affordability*. London: The Food Foundation. Available at: https://foodfoundation.org.uk/sites/default/files/2025-10/TFF_Beans%20Facts_DIGITAL.pdf

[2] The Food Foundation (2023) A Better Deal for Free School Meals. London: The Food Foundation. Available at: https://foodfoundation.org.uk/sites/default/files/2023-11/TFF_FSM%20Allowance_Report_FINAL.pdf

Closing question

41. Do you have any further comments you would like to share with us?

N/A