Guide to this document

This document contains School Food Matters' response to the government's consultation on proposed changes to the school food standards.

Key

Highlighted text = School Food Matters' key recommendations and policy positions.

How to use this document

We encourage schools, school staff, parents and organisations working with children to respond to the consultation before it closes on 12 June 2026.

You do not need to answer every question in the consultation. Respondents can answer as many or as few questions as they wish.

If you agree with our position, you are welcome to:

- Submit our response in full.
- Use selected sections to support your own response.
- Adapt the text to reflect your own experiences and views.

Where possible, we encourage respondents to add examples from their own school or organisation, as this can help demonstrate the real-world impact of the proposals.

About our response

Our response has been informed by the lived experience, feedback and learning gathered through our Nourish and Food Education programmes, alongside evidence from our evaluations and wider work with schools.

Throughout the document we have highlighted key themes that we believe are essential to the successful implementation of the new standards, including:

- Stronger monitoring and compliance.
- A whole-school approach to food.
- Food education.
- Pupil voice and co-design.
- Inclusive implementation for children with SEND.

Link to submit: https://consult.education.gov.uk/school-food-policy-team/school-food-standards-updating-the-leg-framework/

Recommended Responses:

Q1. Do you consent to the data and information you provide being held in accordance with UK GDPR as covered in the Department for Education's personal information charter?(Required)

Yes No More information

2. Would you like us to keep your responses confidential? (Required)

Yes No

3. In processing your data and meeting legal duties, the government may be expected to share information about your consultation response. In line with the privacy notice, would you like your response to be kept confidential? (Required)

Yes No

4. As the government analyses the consultation findings, we may identify direct quotes to include in the published government response, in an anonymised way – may we use your feedback in this way? (Required)

Yes No

5. What area in England are you based in? (Required)

Select as appropriate

6. Are you responding as an individual or on behalf of an organisation? (Required)

Select as appropriate

7. Please select one description of your current role: (Required)

Select as appropriate

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?

School Food Matters 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 and supports improved satiety, concentration, and overall diet quality in children.

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. We would like to see clearer guidance on pancakes within the standards as this is a common food served in schools and is not clearly addressed.

Similarly, the exclusion of processed meats reflects current public health guidance to reduce consumption of these foods. We would suggest providing 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]. 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. 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].

There are some areas where further clarity would support implementation. For example, it would be helpful to clarify whether foods such as baked beans are intended to be limited in frequency, or whether they can be offered daily at breakfast. Additionally, clearer definitions and examples of what constitutes "fruit spreads" and "savoury spreads" would support consistency across settings and reduce ambiguity for providers.

Explicit clarification is also needed on whether pancakes are permitted and under what conditions. Without greater specificity, there is a risk of variable interpretation across schools and providers, leading to inconsistency in implementation and outcomes.
Evidence from School Food Matters' Nourish programme 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 provision. 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].

Food education and tasting opportunities can also play an important role in supporting the introduction of healthier breakfast options. Evidence from the Nourish programme shows that children are significantly more willing to try unfamiliar foods when they have engaged with them through tasting activities and food education beforehand [3]. This suggests that behavioural and educational support is important to ensure that changes in standards translate into actual uptake and acceptance of new foods such as higher-fibre breads, wholegrains and other unfamiliar breakfast items.

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. We suggest adding fortified unsweetened pea milk to the list of permitted plant-based alternatives. 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.

However, we oppose the 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.

[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

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

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, and Cancer Research UK estimates it causes 13% of new bowel cancer cases in the UK annually. 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] [7].

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 [5].

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.

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

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

School Food Matters 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 children 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. School Food Matters' Nourish programme has observed 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?

School Food Matters response = Agree

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

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 to food at lunchtime. Having clear, standalone standards that apply consistently helps 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. The School Food Matters Nourish programme found that 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.

Food provision and food education should reinforce one another across the school day. A whole-school approach is most effective when the curriculum, school food provision and wider school food culture communicate consistent messages about healthy eating. Aligning what children learn about food with what they experience in dining spaces helps strengthen behaviour change and supports healthier eating habits over time. The importance of aligning food education, food culture and food provision is discussed further in our responses on implementation and school support (Questions 34 and 38).

Where different standards operate across settings, it is important that underlying principles remain aligned to support consistency and reduce complexity for schools and caterers. 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 children and families. Evidence from School Food Matters' Nourish programme found 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].

We would 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 from the School Food Matters Nourish programme 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?

School Food Matters 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].

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. 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).

We agree that all bread should be a source of fibre. However, the fibre minimum for bread should align with the 50/50 white/wholemeal 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 wholemeal equivalent [4] contains 6.3/100g and therefore would contribute 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) may 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]. High saturated fat intake is linked to heart disease, stroke and certain cancers in adults [6].

We recommend that the restrictions proposed on focaccia and ciabatta are given greater nuance. 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 recommended that focaccia is permitted as a bread option where it is cooked on site by schools using 50% wholemeal flour. Ciabatta should also be permitted when this is not cooked with oil.

The acceptability of this by children and young people 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 children and young people will be required.

Food education also has an important role to play in supporting children and young people to transition toward higher fibre diets, including increased consumption of wholegrains, pulses and higher fibre alternatives. Introducing these foods through tasting activities, sensory exploration and practical food education can help children become more familiar with, and accepting of, unfamiliar ingredients before they encounter them regularly on menus.

Evidence from School Food Matters' Nourish programme found that children and young people were significantly more willing to try unfamiliar foods when they had engaged with them through tasting and food education activities beforehand [7].

Without this behavioural support, there is a risk that standards lead to structural menu changes without sufficient impact on uptake, acceptance or consumption.

[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_H6

53QXESTP*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] 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

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?

School Food Matters 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. However, we 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. A review is needed of 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 and minimise food waste. An increase to a minimum of one portion of vegetables in grab-and-go should be introduced from 2026. However, increasing to two portions could be phased.

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].

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's 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. 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 of 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; case studies 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] Further evidence from School Food Matters' Nourish programme shows that environmental design and pupil ownership can be more effective than menu specification alone in increasing vegetable uptake [10]. In one school, student ambassadors redesigned and actively promoted a salad bar, resulting in almost all children taking vegetables with lunch.

This demonstrates that changes to the food environment, combined with meaningful pupil engagement, can significantly increase vegetable consumption beyond what is achieved through menu requirements alone.

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 young people 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.

The government should encourage school food governors to work collaboratively with school caterers and students to promote healthy innovation within the grab-and-go offer. We would like to see guidance for schools to ensure that healthy options are never more expensive than less healthy alternatives. The government should also encourage 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).

[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] 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

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?

School Food Matters 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 children.

To be effective in practice, implementation guidance should emphasise 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 children 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 from School Food Matters' Nourish programme 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. 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 [2].

Food education can increase familiarity and acceptance of fruit through tasting and repeated exposure.

We urge the government to incorporate into guidance for 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.

[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] 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.

Reducing sugar | Healthier drinks

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

School Food Matters 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.

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 as a whole. 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, the vast majority of 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]. Recent polling carried out on behalf of Sustain found that 60% of parents support only water and milk (or unsweetened plant-based alternatives) in schools [4].

Clear and proactive communication to parents will be essential. 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.

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

School Food Matters response = Disagree

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

We recommend that the secondary school drinks standards aligns 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 the 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 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.

Having engaged with caterers as part of a series of roundtable discussions about school food standards and school meal funding, we understand that many caterers have concerns about the impact of reduced drink sales in secondary schools, where drinks represent a major source of revenue. However, we think on balance that the impact on child health and the environment overrides the commercial concern.

[1] World Health Organisation. (2023). Use of non-sugar sweeteners: WHO guideline. 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?

School Food Matters response = Disagree

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

We oppose phasing of the healthier drinks standards in secondary schools, and recommended that the standards introduced for drinks in secondary schools 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?

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 aged children 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?

School Food Matters 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 children and young people 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 children and young people 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?

School Food Matters 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. 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 average intake at 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] Because these types of items are often sold both at breaktime and lunchtime on the same day, the standards should additionally specify that when, for example, a batter coated or breadcrumb coated item is sold at breaktime and resold at lunchtime on the same day, this should count as being sold twice in one week.

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] 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.

However, restricting foods alone is unlikely to be sufficient to shift children's food preferences and behaviours in the long term. Evidence from School Food Matters' Nourish programme suggests that healthier food choices are more readily accepted when accompanied by food education, tasting opportunities and meaningful pupil engagement. The programme found that children and young people were more willing to try unfamiliar foods when they had opportunities to engage with them positively, highlighting the importance of pairing any restrictions with activities that build familiarity and understanding. A whole-school approach that aligns what children are taught about food with what they are served is therefore likely to maximise the impact of these proposed restrictions. [8]

We further recommend that the list of foods restricted to one serving per week (or no more than two combined across the week) also include highly processed plant-based alternatives that are high in fat, salt and sugar. 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 [9,10]. We urge OHID and DfE to consider how to categorise the HFSS plant-based products included

in this restriction, taking into account both their nutritional composition and product category , and what is practical and implementable for caterers.

Finally, we disagree with the phased proposals for secondary schools. Evidence from the UK Sugar Reduction Programme shows that extended voluntary timelines can have limited impact [11]. 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] 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
[9] The Food Foundation (2024), Rethinking plant-based meat alternatives, https://foodfoundation.org.uk/sites/default/files/2024-08/Rethinking%20Plant-Based%20Meat%20Alternatives.pdf,
[10] 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/
[11] 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-202

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

School Food Matters 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?

School Food Matters 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?

School Food Matters 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 children meet the free sugars guidelines. Sweet biscuits, cakes and puddings make up 19% of free sugars intake in primary school aged children. [1]

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.

Evidence from School Food Matters' Nourish programme suggests that reducing dessert provision can be successfully implemented in primary schools when introduced gradually and alongside pupil engagement. Schools reported that acceptance improved over time where changes were phased and supported by opportunities for children to understand and participate in them. The programme also found that acceptance was stronger and more sustained where changes were framed positively as part of wider food culture improvements rather than as a restriction. This highlights the importance of accompanying standards with engagement and familiarity-building activities rather than relying on menu change alone. [2]

[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 (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

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

School Food Matters 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 students meet the free sugars guidelines. Sweet biscuits, cakes and puddings make up 16% of free sugars intake in secondary school aged children. [1]

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 young people 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 young people 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]

Importantly, this highlights a key behavioural requirement for successful implementation in secondary schools: young people should be actively involved in co-designing menu changes, including dessert reductions. Acceptance and uptake are more likely to improve when students feel ownership over changes rather than experiencing them as externally imposed restrictions.

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

[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

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

School Food Matters response = Neither agree nor disagree

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

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 the healthier standard. From a behaviour change perspective, gradual reformulation also tends to be better tolerated by young people, reducing the risk of disengagement from school meal provision. However, from a public health perspective making this change faster would be advisable.

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?

School Food Matters 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 on 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. 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.

Evidence shows 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. 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. [2].

Successful implementation will depend on ensuring that meal deals are appealing, with meaningful involvement from young people.

[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] ibid.
[3] ibid.

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?

School Food Matters 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 an excellent proposal with strong nutritional justification. Pulses are nutrient-dense, high in fibre, low in saturated fat, and a good source of plant-based protein and iron. This requirement also gently normalises pulse consumption among children who may have limited exposure to them at home, supporting longer-term healthy eating habits. 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].

Haricot, lentils, chickpeas and kidney beans dominate UK bean consumption, contributing to 90% of total bean consumption for children. 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 [2].

Dinner is the most likely meal to contain beans for children. Lunch and breakfast are further opportunities throughout the day for beans and bean-containing foods to be eaten.

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] Children eating less than one portion of beans per week are 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 [4]. Eating more beans could therefore close this nutrient gap.

Beans and pulses can be successfully introduced onto school menus in a variety of ways, including in popular dishes by blending into sauces, supported by engagement with the staff and students to ensure acceptability and confidence. [5]

Food education also plays an important role in normalising pulse consumption. Schools with strong food education programmes report healthier eating behaviours, and food education activities help children become more familiar with and confident in using pulses and other unfamiliar ingredients before they appear on menus.

Tasting activities and pupil co-design can further support acceptability, helping ensure that pulse-based dishes are more positively received and sustained when introduced into school menus.

[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] ibid.
[3] ibid.
[4] 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
[5] 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

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

School Food Matters 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 students.

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?

School Food Matters 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. 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]. Standards should 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.
The restriction on meat alternative products (marketed as such) to no more than two portions per week should be accompanied by clear guidance on what this category includes. 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. However, we suggest that the list of exemptions also include tempeh and seitan [2].

We recommend that the standards on protein 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.

Clarification is needed on the restriction to maximum two servings a week of plant-based alternatives marketed as meat alternatives that are ‘homemade’. 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.

We also recommend that 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. Availableat: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-LancetCommission.(2019).Summaryreportof theEAT-LancetCommissionon Food,Planet,Health.Availableathttps://eatforum.org/content/uploads/2019/07/EAT Lancet_Commission_Summary_Report.pdf

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?

School Food Matters response = Agree

Overall question

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

School Food Matters response = To a great extent

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 children and young people 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.

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.

Communication with parents and children 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.

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. Schools should be actively encouraged and supported to co-design menus with children and young people, 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.

Special dietary requirements will need careful handling. Clear guidance is needed on how schools should apply the standards for children and young people 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 children or young people.

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 children and young people are actually eating school meals. Poorly managed transitions risk alienating children and young people 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. Without familiarity-building and pupil engagement, there is a risk that menu changes alone will reduce acceptance and uptake, particularly in secondary schools. Supporting children and young people to understand, experience and engage with new foods is therefore a practical implementation challenge, not simply an educational consideration. Food education is not a parallel or optional activity: it is a core implementation mechanism through which the school food standards become effective.

Funding for school food needs to be kept under review, particularly for small schools and caterers who do not benefit from economies of scale in the same way that larger schools and caterers do. Funding must be sufficient to support head teachers, business managers and their catering partners. Research commissioned by School Food Matters identified 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 in 2024 (£2.53) [1]. Evidence from the Nourish programme also found that 62% of school staff identified budget pressures as the greatest risk to sustaining food improvements once external support ended [2].

Research with secondary schools also highlights that successful implementation depends on gradual change, meaningful student engagement and strong catering team involvement. These are practical implementation challenges that require time, capacity and support, rather than a compliance-only approach.[3]

Evidence from School Food Matters' Nourish programme found that food education activities (including tasting sessions, cooking workshops and sensory food exploration) were a key factor in children and young people accepting menu changes, and that children were more willing to try new and unfamiliar foods when they had engaged with them through food education before encountering them on the menu. The programme also found that schools which embedded food education as part of a whole school approach saw broader and more sustained improvements in food culture than those which focused on catering provision alone. [2] In 144 schools surveyed about the impact of a food education programme on school lunches, 74% of children were more likely to finish their vegetables, 58% of caterers served more vegetables with school lunches and in 52% of schools children were encouraged to try school meals.[4]

Making food education integral to the implementation of the standards could also help convince sceptical parents and young people to accept them. Recent reporting shows that parents and young people aged 11–16 value and recognise the importance of food education, with under 50% of young people with a school canteen reporting that the food they could buy or eat at school matched what they were taught about eating well and staying healthy, and an even smaller proportion reporting the same about available snacks.[5]

The fuller case for food education as an implementation mechanism is set out in our responses to Questions 37 and 38.

[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] 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
[3] 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
[4] Veg Power (2025) Eat Them to Defeat Them 2025: National Report. Available at: https://vegpower.org.uk/wp-content/uploads/2025/08/Eat-The-to-Defeat-Them-2025-National-Report-1.pdf?type=original
[5] Best Food Forward (2025) Best Food Forward Evaluation Report. Available at: https://www.bestfoodforward.co.uk/_files/ugd/6cff52_5c5d49aae7054a6397bb3cc48953bf2f.pdf

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?

School Food Matters 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?

School Food Matters 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.
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 from School Food Matters' Nourish programme found that governor involvement was 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 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, alongside inclusion within Ofsted's consideration of school food governance structures.

External verification is essential to ensure governance structures are taken seriously rather than treated as a paperwork exercise. Ofsted should be required to check that school food governance structures are in place as part of routine inspection, and annual reporting should be made a condition of school food grant funding.
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].

Compliance checking addresses the separate, but important, question of whether the standards are actually being met in what children are served day to day. Schools should be required to use a standardised self-reporting compliance tool to verify their menus against the standards. In addition, this should be complemented by a national school food audit scheme delivered through Environmental Health Officers, providing independent verification across all settings. The combination of self-assessment and independent audit ensures broad coverage without placing disproportionate burden on any single school.
Accreditation and support are also essential to ensure that when gaps are identified, schools have the resources and knowledge to address them. Schools should be required to use a recognised quality assurance scheme, and School Food Improvement Officers should be introduced in every local authority to provide hands-on support, and mandatory training should be introduced across the whole school food workforce. Without these support mechanisms, accountability and compliance risk becoming punitive rather than genuinely effective.

To support compliance, senior leadership teams should prioritise food education in the timetable and align school food policies and provision with the food education curriculum. This creates consistent messaging about food across the school day and helps build the positive food culture that makes standards stick in practice. Involving children and young people through food education lessons in co-designing menus helps explain and reinforce changes — particularly when introducing less familiar foods such as pulses. Schools should also engage parents and carers in food education activities where appropriate, helping to reinforce healthy eating messages beyond the school environment. Evidence from School Food Matters' Nourish programme supports this: schools that involved students in menu design through food ambassador roles and structured consultations with catering teams not only saw greater acceptance of new menu items, but sustained improvements more effectively once external support ended. [1] In one school, student ambassadors running a

redesigned salad bar resulted in nearly every pupil taking vegetables with their lunch. Food education and pupil engagement are among the most effective practical tools available for achieving compliance. The broader case for government investment in food education as a system-level enabler is set out in our response to Question 38.

[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

38. What practical methods do you think government could take to help ensure schools meet 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 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. Template communications for parents and children 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.

Standards are not self-executing: schools often require practical interpretation of support to translate policy into menus, timetables and procurement decisions, particularly where existing provision is constrained by contracts or capacity.

Funding: Adequate and sustained funding is a prerequisite for successful implementation. Research commissioned by School Food Matters found a gap between the true cost of delivering a nutritious, sustainable school lunch and the funding available at the time of the study [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. 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.

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.

Training should also recognise the role of food education as part of implementation infrastructure, supporting schools to build familiarity and acceptance of new foods through tasting, sensory exposure and practical learning alongside menu change. Food education is not a parallel or optional activity - it is a core implementation mechanism through which the School Food Standards become effective. Government support for implementation should therefore explicitly integrate food education alongside catering and compliance guidance, rather than treating it as a separate policy area.

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 need 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 conducted on behalf of Sustain 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 children and young people do not have sufficient time to access and eat a meal. 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.

The redrafting of the national curriculum provides an ideal opportunity for government to strengthen the role of food education in supporting implementation of the school food standards by categorising it as a "breadth" subject for GCSE selection, giving it foundation subject status up to KS4, and providing curriculum guidance and resources aligned with the standards. In addition, appointing school food leads in MATs and local authorities to align curriculum, enrichment and food provision would help ensure consistent delivery. The appointment of a D&T lead at Ofsted would strengthen accountability for food education and help schools join up food policies.

The government needs to invest in food education teaching, training more food education teachers, and ensuring adequate training for primary school teachers and Continuing Professional Development (CPD) for all teachers. Food education needs to be funded to ensure there are adequate teaching facilities including equipment, and ingredients available to all children. Food education teachers can play a vital role in embedding the school food standards within schools working in conjunction with catering staff, senior leadership and parents/carers to help create a whole school approach to food through the alignment of curriculum, policies and provision.

Evidence from School Food Matters' Nourish programme also demonstrates that food education is most effective when linked directly to school food provision and wider school culture. Schools that aligned curriculum, catering and pupil engagement activities were better able to embed healthy eating messages consistently across the school environment. This reinforces the need for government support that connects food education, school food provision and whole school food policies, rather than treating them as separate areas of work.[3]

[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] 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

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 are likely to have 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. The extension of free school meals and the improvement of nutritional standards together represent a significant equity intervention. Increased fruit and vegetable provision and reduced sugar and saturated fat will benefit all children and young people regardless of background but could particularly help address the inequalities in consumption of healthier foods.

Cultural inclusivity: Schools will need 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.

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.

Evidence from the Adapt-Ed study, led by the University of Hertfordshire with School Food Matters as a research partner, 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 children and young people know what to expect, and providing a range of ways for them to make informed choices and provide feedback.

Clear guidance on reasonable adjustments and exceptions 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. Recent guidance on reasonable adjustments in accessing free school meals [1] needs further clarification on which children and young people 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. The Department for Education should also 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]

Practical implementation support should also include SEND-informed communication approaches, including the use of photographs of meals and clear ingredient listings to support children's understanding of what is being served. This has been highlighted by children and young people with SEND as an important factor in helping them engage with and accept school food changes.

Age: Secondary students 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. 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 young people 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)

Environmental principles

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

School Food Matters 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.

However, realising these 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. Government should take this opportunity to make compliance with Government Buying Standards a requirement alongside the updated School Food Standards.

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.

One potential short-term negative effect worth acknowledging is an increase in food waste during the transition period, as children and young people 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

Closing question

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

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 from School Food Matters' five-year Nourish programme evaluation shows that standards alone are insufficient to drive lasting change. [1] Prior to intervention, school staff frequently lacked awareness of how existing standards applied in practice, and the gap between what was required and what was served was significant. The evaluation recommends 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.

School Food Matters strongly supports a whole-system approach to implementation. Evidence from the Nourish programme and wider School Food Matters research consistently shows that implementation success depends on aligning policy, practice and school culture. Across Nourish settings, lasting improvements were achieved where schools adopted a whole school approach to food, with coordinated action across catering provision, curriculum, leadership and the wider school environment. The five conditions identified in secondary settings — including a "slow and steady" approach, sustained student engagement, strong catering team involvement, collaboration with external partners, and celebrating progress — provide a practical framework for government implementation support.[2]

Funding is a critical enabler of success. The critical need for reform in school food funding, alongside evidence that 62% of schools identify budget pressures as a key barrier to sustaining improvements, demonstrates the need for indexed funding and long-term financial planning to support delivery.[1]

In addition, SEND considerations require dedicated attention. Evidence shows that children in special schools are significantly less likely to access their entitlement, and schools require specific guidance and funding to ensure inclusive implementation that meets a wide range of dietary, sensory and accessibility needs.[3]

Implementing the School Food Standards may be particularly challenging for children with SEND but food education is often the most accessible, high engagement subject for students with complex needs. This underlines the need to ensure food education is taught as a foundation subject up to KS4 to ensure equity and inclusion and the overall successful implementation of SFS for all children. School Food Matters' experience through the Nourish programme, alongside research from the University of Hertfordshire Adapt-Ed study, supports this point. Food education activities including

sensory exploration, cooking sessions, and tasting activities outside mealtimes were found to help children with SEND engage with new foods in a low-pressure, confidence-building way. Staff in special schools reported that structured food education activities could successfully support children and young people with sensory sensitivities and fine motor difficulties to try foods they had previously refused. This reinforces the importance of protecting and resourcing food education as part of an inclusive whole school approach to implementing the standards.[1,3]

A key implementation challenge is ensuring consistency across schools, as evidence suggests that outcomes vary significantly depending on the extent to which schools are able to embed coordinated approaches across catering, leadership and the wider school environment. Without this alignment, there is a risk of uneven implementation and unequal access to the benefits of the standards.

A further challenge is maintaining sustained behaviour change over time. Evidence from School Food Matters' Nourish programme indicates that improvements are strongest where schools are supported to embed changes gradually, with ongoing engagement from children and young people, staff, and catering teams, rather than relying on one-off menu changes. This highlights the importance of long-term support structures rather than short-term compliance measures.[1,2]

The current curriculum review provides a time-limited opportunity that the government must not waste. Giving food education foundation subject status up to KS4, aligning curriculum guidance explicitly with the School Food Standards, and appointing school food leads in MATs and local authorities to connect curriculum, enrichment and provision would together create the structural conditions for these standards to succeed. If that opportunity is missed, these standards risk delivering compliant menus without delivering healthier children. School Food Matters urges the government to seize this opportunity.

[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] 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] 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)