

British Nutrition Foundation consultation response. School Food

Standards: updating the legislative framework

12th June 2026

10. Breakfast club foods and drinks:

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?

Position (Strongly agree / **Agree** / Neutral / Disagree / Strongly disagree):

- The government expansion of the free school breakfast club programme highlights the role the food served at breakfast in schools can play in providing a nutritious start to the day. Our recent evidence (Gibson-Moore et al. [2023](#)) emphasises the impact that breakfast can have on fibre and micronutrient intakes in children. School staff have suggested breakfast clubs can encourage pupils to eat more healthily and that some children are more likely to consume breakfast and try new foods at breakfast clubs than they are at home (Graham et al., 2015, 2017). The government's expanded breakfast club programme should mean that more children can start the day without hunger and better prepared to learn.
- The Foundation therefore welcomes focus within the Standards on improving nutritional quality of breakfast provision – reducing sugar while increasing fibre, wholegrains, fruit and vegetables and dairy/dairy alternatives to support a healthy start to the day. This is particularly important against the backdrop of the cost-of-living crisis, with reports of children arriving at school hungry, which can negatively affect concentration and learning. (Gibson Moore et al [2023](#)) Improving access to healthier breakfasts in schools could improve nutritional intakes of the most vulnerable children and young people and may contribute to reducing inequalities in educational outcomes, at least in the short term. To maximise impact, it will be essential that the standards are effectively implemented and monitored. Consideration should be given to potential unintended consequences (e.g. increased food waste, poor uptake of breakfast club provision in both primary and secondary schools and the accessibility and suitability of providing for neurodivergent) children.
- The Foundation would add the following comments with regards the proposed regulation:
 - The Eatwell Guide includes 150ml portions of unsweetened fruit/vegetable juices and smoothies. Although most schools will only serve water at lunchtime, allowing limited portions (150ml) of unsweetened fruit juice may be particularly useful at breakfast where it can contribute valuable nutrients like folate and vitamin C (for example NDNS data indicates fruit and vegetable juices and smoothies contribute 20% of vitamin C intake in children aged 4-10 years and 5% folate intake in 11-18 year olds) and can also help absorption of non-haem iron from commonly eaten breakfast foods like bread and cereals. Whole fruits remain the preferred option,

however, permitting a 150ml serving of fruit juice at breakfast may provide a practical and nutritionally useful addition although this should not count towards the recommended portions of fruit and vegetables within the standards. Where less stringent regulations on free sugars are applied to products such as breakfast cereal, yogurts and sweet spreads, the exclusion of fruit juice/smoothies at breakfast clubs may reasonably be questioned. For example, smoothie recipes (e.g. blends of frozen berries, bananas and semi-skimmed milk) are included in the NHS Better Health Healthier Families recipes, demonstrating their role within balanced dietary patterns. Education around portion size rather than omission at breakfast may be a better option.

- The inclusion of plant-based alternatives that are fortified with a wide range of minerals and vitamins is important to support nutritional adequacy, particularly where these products are used as substitutes for dairy foods. However, there may be challenges in consistently sourcing such fortified options within the current market, particularly at scale and affordable for school settings. This highlights a potential area for further product development and innovation to ensure that suitable options are widely available and accessible.
- It is notable that the Standards appear to favour sugar over non sugar sweeteners (NSS) in breakfast food provision (e.g. yogurt). This contrasts with the conclusions of the SACN review on NSS, which indicate that, for older children, replacing sugars with NSS may help reduce overall sugar and energy intakes, at least in the short term - the long-term goal is to limit both sugar and NSS intakes. In this context, greater clarity on the rationale for the current approach within the Standards would be helpful. A more nuanced position in secondary schools recognizing the potential short-term role of NSS in reducing sugar intake while maintaining the longer-term goal of reducing reliance on both, may better align with existing evidence and support a more coherent dietary message.
- Clarification could also be provided with regards to:
 - portion sizes of fruit and vegetables (including a link or reference to older guide if using that)
 - use of fat spreads; (no mention of this)
 - specification for higher fibre breakfast cereals (currently only sugar and not fibre content indicated)
- Eggs – add specification for no salt added in cooking
- With reference to supporting attendance:
 - For 'grab and go' provision, which is often preferred in secondary schools, it may be helpful to have examples/recipes illustrating how nutritionally balanced options can be delivered in this format (e.g. portable items that meet the Standards while remaining appealing and convenient).
 - It would be useful to engage with key stakeholders, including pupils and parents, to better understand the factors that encourage or discourage attendance at breakfast clubs. Incorporating these insights could support the design of provision that is both nutritionally appropriate and accessible, thereby helping to maximise uptake.

- Consideration should be given to the sustainability implications of the recommendation to provide sachet portions. While such formats may support portion control and convenience, they can increase packaging waste which is a sustainability concern and an additional expense for schools.

11. Processed meat at breakfast

Do you think processed meat should be permitted to be served at breakfast? Free text

We do not think processed meat should be served at breakfast.

A reduction in processed meat, as well as being of benefit to environmental sustainability, could support lower salt and saturated fat intakes, as discussed in our recent paper *Meat and the future of sustainable diets – Challenges and Opportunities*. Our paper also noted the popular consumption of processed meat in children, for example as a popular choice for packed lunches for children – which may reflect both cost and convenience - and the relatively high contribution it can make to children’s salt intakes.

Restricting processed meat at breakfast will help reduce processed meat intakes and encourage healthier protein options within school breakfast settings. To support implementation, a list of processed meats could be provided, and the inclusion of processed white meat (chicken slices/pieces) could be clarified as all current examples are processed red meat. In addition, listing examples of healthier swaps for breakfast protein sources may be helpful e.g. egg and tomato wholemeal wraps instead of bacon rolls/sausage sandwiches.

12. Honey should not be permitted

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

Position (Strongly agree / Agree / Neutral / **Disagree** / Strongly disagree):

Honey is recognised as a free sugar and limiting free sugars is an important part of the Standards. However, it may seem somewhat contradictory that fruit spreads (jams) are permitted in small portions. Allowing limited and small portions of honey, for example to otherwise low-sugar options such as plain porridge with fruit or plain yogurt, could support the provision of more nutritious breakfast choices. Used occasionally (e.g. maximum twice a week) might encourage acceptance and consumption of healthier breakfast options, in a way that is broadly comparable to the inclusion of low-sugar breakfast cereals within the Standards.

The School Food Project provides a range of high-quality resources to support implementation of the school food standards, and its breakfast recipes and guidance include the use of honey, with the recommendation to limit provision to no more than twice a week (<https://schoolfoodproject.org.uk/resources/breakfast-clubs-guide/>).

13. Separate standards for the whole school day

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?

Position (Strongly agree / **Agree** / Neutral / Disagree / Strongly disagree):

In light of the government's initiative to increase breakfast clubs, school breakfast provision will likely make a greater contribution to the nutritional intake of many children. Although there are fundamental similarities in the types of foods and nutrients encouraged across the school day, having separate standards for breakfast allows for a more targeted focus on nutrient dense foods typically eaten in the morning e.g. breakfast cereals, porridge, toast and other bread products, eggs, yogurt and other dairy products (and fortified alternatives). Additionally, school breakfast provision offers an important opportunity to increase children's intake of fruit and veg, which can be actively encouraged during this time. Having specific standards for breakfast also supports improved monitoring of nutritional quality and data collection, with learnings for schools on effective strategies to encourage pupil participation in breakfast clubs.

14. Fibre requirements for starchy foods

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

Position (Strongly agree / **Agree** / Neutral / Disagree / Strongly disagree):

86% of children aged 4 to 10 years and 96% children aged 11 to 18 years do not meet the fibre recommendation for their age group. Healthy eating guidelines recommend that a variety of less refined and higher fibre starchy carbohydrates should form the basis of meals. This includes wholegrain products as well as **potatoes with skins** to increase fibre intakes. In addition to guidance that 50% of bread products should be wholegrain, more specific and ambitious standards could be applied to popular flour-based dishes. For example, pizzas could be required to contain $\geq 50\%$ wholemeal flour as this will help children to become more familiar with higher fibre options in commonly selected items. Progress towards increasing fibre intake should also be supported through a whole school approach e.g. cooking classes using higher fibre starchy staples in recipes, helping pupils to build familiarity and confidence skills in preparing and in consuming these foods.

15. Vegetables/salad with grab-and-go meals

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?

Position (**Strongly agree** / Agree / Neutral / Disagree / Strongly disagree):

The Foundation recognises that average intake of fruit and vegetables falls short of recommendations. On average, dietary surveys suggest children aged 11 to 18 years consume 2.8 portions per day and only 9% meet the 5 A Day recommendation. Standards that increase fruit and vegetable intake at schools are important.

Bite Back 2026 research reports grab-and-go food and soft drinks make up a substantial and routine part of the food on offer at secondary schools in England. Many school children spend lunchtimes engaged in extra-curricular activities, or are keen to get outside the building. However the amount of time available for lunch is typically squeezed, leading to children skipping lunch or grabbing ready-to-go items with. The research reports 60% of students buy grab-and-go at least once a week and 40% buy it 3 - 4 times per week at lunch. Moreover 56% of students who receive free school meals buy grab and go lunches 3 or more times a week vs 36% of students not on free school meals. Grab and go food items have become embedded, reflecting a complex interplay of school food system despite these items frequently falling short of the current School Food Standards. Yet grab and go does not have to be inherently unhealthy and including a portion of vegetables/salad would be helpful. It may be important to reiterate the portion size of veg/salad to be included as portion sizes e.g. salad in sandwich/veg in pasta pots can be minimal. Current food standards outline portion sizes as 40-60g for primary and 80g for secondary.

We would also suggest a requirement to have at least two portions of vegetables in the standard school lunch to encourage higher use of veg – this will align with Scottish and Welsh standards

16. Fruit-only dessert day in primary schools

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?

Position (Strongly agree / **Agree** / Neutral / Disagree / Strongly disagree):

Introducing at least one day a week where fruit is the only dessert option is a practical step toward improving children's dietary intakes (helping to lower free sugar and increase fruit intakes) without being overly restrictive. It helps normalise fruit as a good option after a meal. Rather than removing desserts entirely—which could lead to resistance—it preserves familiarity while nudging choices in a healthier direction. If feasible, this could be linked with local/UK-based public procurement, encouraging use of local/UK grown fruits and reinforcing connections between food, agriculture and sustainability. Additionally, this policy could serve as a stepping stone to further improvements such as gradually shifting towards offering fruit and yoghurt-only desserts on the majority of days. Overall, the proposal strikes a sensible balance between health promotion and practical implementation, making it a realistic and constructive change within the standards, but one that could be strengthened as the school food standards are reviewed going forwards.

17. Permitted drinks in primary schools

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

Position (**Strongly agree** / Agree / Neutral / Disagree / Strongly disagree):

We strongly agree that free fresh drinking water should be available at all times, from properly maintained water fountains and taps – and children should be encouraged to

drink water. Water should be freely available rather than sold as bottled water which increases plastic use and waste.

We support the recognition of plain milk and fortified plant-based drinks as suitable hydration options. The emphasis of fortification beyond calcium (such as vitamin D, iodine and vitamin B12) is important given the role of these nutrients in growth and development. However, sourcing of the specified fortified drinks at an affordable price point may prove challenging and we urge the government to ensure supplies of these options at reasonable cost.

There is justified concern about allowing sugar sweetened beverages in schools as these have historically been a major contributor to free sugar intake and are associated with adverse health outcomes, including dental decay and increased risk of excess weight. Schools play a critical role in shaping dietary norms and permitting sugar-sweetened drinks would undermine efforts to promote healthier, long-term habits. There is also widespread agreement that portion sizes of unsweetened fruit juices and smoothies should be limited as they contribute free sugars. Daily consumption of 150mls of unsweetened fruit/vegetable juices and smoothies is included within Eatwell Guide, and might be useful part of the breakfast provision to support iron absorption from wholegrains breads and cereals. However, lunch recommendations could concentrate on encouraging fruit and veg intake from whole fruits and veg rather than juices and a space to encourage water intake.

18. Permitted drinks in secondary schools

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

Position (Strongly agree / **Agree** / Neutral / Disagree / Strongly disagree):

The proposed list of permitted drinks appears to be a pragmatic and realistic approach that balances health priorities with the behavioural realities of older children. While the ideal remains to promote water and minimize exposure to sweetened drinks, older children are more independent and often lack access less healthy beverages outside of school. A policy that is too restrictive risks disengagement and poor compliance.

Allowing sugar-free beverages may help support hydration while also reducing free sugar intake, particularly as a transition step. Evidence, including SACN guidance, acknowledges that replacing sugars with non-sugar sweeteners may help reduce overall sugar and energy intake in the short term. However, it is equally important to emphasise that the long-term goal should be to reduce both sugar and non-sugar sweetened drinks, reinforcing water and milk as the norm. A phased and co-created approach, involving pupils in shaping drink offerings and policies, could improve acceptance and adherence. The removal of fruit juice and combination drinks from school meals services whilst permitting sugar free flavoured still water, fruit-flavoured, no added sugar still drinks in secondary schools may be a realistic compromise that supports sugar reduction while working towards children drinking water as the main choice, although previous regulations allowed max of 150mls unsweetened fruit juice in line with Eatwell Guide.

Tools such as those available to progress schools to water only schools could be encouraged

https://www.london.gov.uk/sites/default/files/water_only_secondary_school_toolkit_1feb_2022.pdf. Whilst schools are getting ready to comply, it's imperative that free clean school water is genuinely readily available, including in all areas where food is being served or sold.

19. Phased introduction of healthier drinks in secondary schools

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

Position (Strongly agree / **Agree** / Neutral / Disagree / Strongly disagree):

See response to Q18:

In addition, although there has been some criticism of the idea of a slower introduction to healthier school standard drinks in secondary schools. allowing time for co-created approaches to healthier hydration may increase compliance and prevent increased intake outside of school/bringing sugar-containing beverages in from home, although individual school food policies could help address this.

20. Views on differences between primary and secondary drinks standards

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

Position (Strongly agree / **Agree** / Neutral / Disagree / Strongly disagree):

It is widely recognized that, while compliance with standards in school food standards is essential, these alone may not be sufficient to influence adolescents, who have more autonomy and agency over their choices. For this age group, the consumption of sugar-sweetened beverages is often embedded within social culture, influenced by targeted marketing, peers and wider environmental factors. Adolescents may consume sugary beverages to cope with fatigue, relieve stress or enhance social interactions, There is no doubt that initiatives to reduce the frequency and number of sugary drinks consumed by children and adolescents should remain a key priority in school food and drink provision. However, older children/adolescents are likely to require a different approach in order to successfully reduce sugar-containing beverages.

21. Dairy and plant-based requirements

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

Position (Strongly agree / **Agree** / Neutral / Disagree / Strongly disagree):

The proposed changes to dairy and plant-based requirements which provide important nutrients to children are broadly welcomed. There is alignment with Scotland's threshold for maximum total sugars in yogurt at 10g/100g and this reflects a more ambitious standard than the WHO European Nutrient Profile Model for yogurts (which permits up to 12.5g/100g). However, it would be useful to understand if the dairy and plant-based options now recommended would be classified as 'healthier' in the NPM 2018 model as

there should be alignment of regulatory thresholds between this policy and the foods served in schools. Although we recognize that policies are for different uses, consistent approaches to definitions of healthier foods supports long term education and understanding. We note for example that the strawberry fromage frais in the government guidance for the NPM2018 with <10g sugars could be served in schools but would be classified as less healthy under the NPM2018 model.

There should also be assurance that dairy alternatives are appropriately fortified with calcium, iodine, vitamin D, riboflavin (B2) and vitamin B12 are available for schools e.g. through wholesalers, and are affordable.

22. Restrictions on foods high in fat, sugar and salt

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

Position (**Strongly agree** / Agree / Neutral / Disagree / Strongly disagree):

The Foundation welcomes the continued focus on reducing HFSS foods – this represents an important and consistent thread across policy and is underpinned by a strong evidence base demonstrating the association between foods high in saturated fat, salt and sugars and adverse health outcomes. NDNS data indicates that children’s intakes of these nutrients of concern exceed recommended maximum levels, reinforcing the need for continued action in this area.

Suggested amendments could include adding oatcakes to savoury crackers and clarification of plain savoury crackers and breadsticks ‘with no added salt, sugar or fat’ to ‘low in salt, sugar and fat,’ as oil and salt will be part of the standard ingredient list of these products.

23. Restrictions on serving cheese

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

Position (Strongly agree / **Agree** / Neutral / Disagree / Strongly disagree):

Cheese is a valuable source of calcium and other nutrients, but and is high in saturated fat and salt. Whilst it falls within the dairy food group rather than the protein food group. It is commonly used in vegetarian options as a main protein source. In order to encourage healthier and more varied choices and increase the nutritional value of non-meat options, it would be beneficial to complement restrictions with positive guidance. Specifically, clear recommendations on incorporating non-dairy protein sources, such as pulses (environmentally friendly, high in protein, high in fibre) are helpful to support a shift away from over-reliance on cheese in non-meat options to more balanced options. Looking at what should be offered, rather than only what should be limited is a positive approach, and ensuring vegetarian / vegan meals are varied is important.

Additionally, clarification would be helpful regarding the differing treatment of cheese across food formats; for example, its restriction in paninis but not in sandwiches or baguettes. Providing a clear rationale for this distinction would support caterers in consistent implementation of the standards.

24. Phased restrictions on cheese as a main protein option

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?

Position (Strongly agree / **Agree** / Neutral / Disagree / Strongly disagree):

Implementing the transition through a phased approach would provide secondary schools with the opportunity to engage pupils and parents, refine and test new recipes and help embed sustainable changes while minimizing operational disruption. A gradual transition may also help prevent unintended consequences, such as reduced uptake of school meals or an increase in packed lunches. It is important for schools to work collaboratively with caterers, local suppliers, pupils and parents throughout the implementation process.

As restrictions are introduced on some of the popular cheese-based dishes, the desirability of the food on offer should be carefully considered. Adolescents have increasing autonomy over their food choices, and these factors may lead them to purchase food from out of school or bring food from home, especially if preferred options are no longer available within the school setting. This risk should be closely monitored to ensure that the intended nutritional benefits of the policy are not undermined.

25. Reducing desserts in primary schools

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

Position (**Strongly agree** / Agree / Neutral / Disagree / Strongly disagree):

Reducing the routine availability of desserts in primary schools may contribute to lower free sugar intake, help normalise healthier meal patterns and support the development of healthier food preferences. Approaches that focus solely on restriction may be less effective than those that combine healthier provision with nutrition education and pupil engagement. A balanced approach that supports sugar reduction without demonising foods can be achieved through reducing, rather than completely restricting, desserts. Schools should be encouraged to move towards offering only fruit and yoghurt-based desserts on the majority of days, rather than routinely serving standard sweet desserts accompanied by fruit, and this could be considered in future school food standard updates which we would recommend would take place at regular intervals. As with regular reviews of dietary guidelines (e.g Dietary Guidelines for Americans), there may be consideration of review of school food standards every 5 years.

The overall impact on dietary behaviour is likely to depend on the wider school food environment, including the provision of food education, opportunities to develop cooking skills, and whether pupils substitute with foods purchased from outside the school setting.

26. Reducing desserts in secondary schools

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

Position (**Strongly agree** / Agree / Neutral / Disagree / Strongly disagree):

Rationale (**as for primary schools above**):

Reducing the routine availability of desserts in secondary schools may contribute to lower free sugar intake, help normalise healthier meal patterns and support the development of healthier food preferences. Approaches that focus solely on restriction may be less effective than those that combine healthier provision with nutrition education and pupil engagement. A balanced approach that supports sugar reduction without demonising foods can be achieved through reducing, rather than completely restricting, desserts. Schools should be encouraged to move towards offering only fruit and yoghurt-based desserts on the majority of days rather than routinely serving standard sweet desserts accompanied by fruit, and this could be considered in future school food standard updates. We would recommend would take place at regular set intervals, e.g. as with US dietary guidelines, there may be consideration of review of school food standards every 5 years. The overall impact on dietary behaviour is likely to depend on the wider school food environment, including the provision of food education, opportunities to develop cooking skills. Cost and wastage should be monitored, as should any potential substitution effects e.g. purchasing sugary snacks and drinks before or after school which may be looked at through NDNS data.

27. Phased reduction of desserts in secondary schools

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

Position (**Strongly agree** / Agree / Neutral / Disagree / Strongly disagree):

Implementing the transition through a phased approach would provide secondary schools with the opportunity to engage pupils and parents and help embed sustainable changes while preventing the potential unintended consequence of reducing uptake of school meals and increasing packed lunches.

It is notable that school food standards with particularly low levels of compliance tend to be those relating to the restriction of less healthy foods. This highlights the importance of balancing compliance with pupil preferences, maintaining school meal uptake and ensuring financial viability.

28. School meal deal contents

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

Position (**Strongly agree** / Agree / Neutral / Disagree / Strongly disagree):

Healthier Food items bundled together as a meal deal could potentially provide a convenient and cheaper route for healthier options, making it easier to make healthier choices. It could be a way of encouraging more fruit and vegetables and higher fibre items (e.g. including wholemeal/wholegrain options) by offering these at a favourable price point. This approach may help address findings from FixOurFood/The Food Foundation research, which highlighted that pupils eligible for free school meals were sometimes limited to specific "meal deal" options. In some cases these included a dessert, and a

bottled drink, even where healthier alternatives were available. Co-creating these meal deals with pupils to increase awareness and acceptability could be a supportive strategy.

29. Increasing pulses in menus

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

Position (**Strongly agree** / Agree / Neutral / Disagree / Strongly disagree):

Pulses are a low cost, nutrient-dense food, high in protein and fibre, low in saturated fat and a valuable source of vitamins and minerals like iron and folate. Pulses typically have a lower environmental footprint than other crops because their production does not require nitrogen fertilisers. Pulses also improve the quality of the soil which can benefit the growth of subsequent crops. There's a growing recognition of the benefits of increasing pulse intake within the educational sector. The Foundation has, for example, worked with University of Reading through the *Raising the Pulse* project to increase the use of UK grown pulses in university catering. Learnings from BeansMeals, a UKRI Transforming the UK Food System project, that worked with Leicestershire schools to increase pulses in school lunches, included the need to:

- add any beans, dried, frozen or tinned to the existing menu. This can be done without too much disruption.
- ask staff, pupils and the wider community for ideas on improving food in school.
- work closely with caterers and cooks to have an open and informed discussion about lunchtime menus on a regular basis, including the catering staff and midday supervisors in the school food team.
- offer tasters of new foods to children and parents and invite parents in for a school meal

Although there is increased popularity of foods like hummus and falafel, pulses are still eaten in low quantities in UK. Increasing pulses on menus should improve familiarity, and this can be coordinated with food education and cooking skills as part of a wider school approach and in sustainability education. Additionally, gradually blended meat/pulse dishes using familiar popular dishes such as Bolognese, chilli and burgers, can help increase fibre and reduce saturated fat intakes. Gradual substitution tends to perform better than complete replacement.

30. Phased increase of pulses in secondary schools

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

Position (**Strongly agree** / Agree / Neutral / Disagree / Strongly disagree):

It is important to ensure the changes are implemented and accepted, and to use the time allowed for phased increases to develop strategies for this to happen – including developing recipes, taste testing and involving actors across the school – parents, pupils, senior leadership, food/DT teachers, sports teachers and practitioners and, of course, the catering staff. This would allow a whole school approach to encourage shared ownership and help build a deeper understanding of nutrition and sustainability. By co-creating solutions with those directly involved, the focus shifts from a top-down directive to one that

prioritises appealing, tasty and nutritious food choices that are more likely to be accepted by pupils.

For catering teams and school leadership, there is an opportunity to model and evaluate the financial implications of menu changes. For example, incorporating blended meat/pulse dishes could offer significant cost saving while also supporting environmental and health objectives.

31. Protein changes in school menus

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

Position (Strongly agree / **Agree** / Neutral / Disagree / Strongly disagree):

Part of the proposed changes in protein provision in school meals should align with the broader transition towards healthier and more sustainable diets.

Nutritional adequacy in any dietary pattern, whether including or limiting animal-based proteins, is important. Plant foods can provide important nutrients including fibre, vitamins and minerals, and unsaturated fats. Consuming a more plant-rich diet that contains a wide variety of different foods from the main food groups can provide the range of nutrients the body needs to stay healthy, as well as be more environmentally friendly. However, it is important to note that animal food sources also make an important contribution to many nutrients in the UK diet (e.g. protein, iron, zinc, omega 3 fatty acids), and in some cases these may be more bioavailable. Bioavailability is sometimes omitted from discussions on plant and animal food sources yet may be an important consideration particularly where intakes of micronutrients such as zinc and iron are low in young people. Guidance for schools around eating a healthy, more sustainable diet should encourage diversifying protein sources and including more plant-based versions, but not excluding animal derived foods completely. The focus should be on providing choice, encouraging a healthy diet and achieving a balanced approach to protein intake. This includes promoting plant-based foods that are high in key nutrients typically associated with animal-based foods contain e.g. pulses for iron, while still maintaining a varied and acceptable menu to suit all pupils.

However, in relation to meat, consideration could be given to expanding the proposed changes to include some restrictions on red meat. Red meat is a good source of a range of important nutrients including iron and zinc. Inclusion of red meat in school menus can help meet the nutrient requirements for school aged children but for health and sustainability, high intake of red meat should not be encouraged, and maximum recommendations should be included. This will align with the Scottish and Welsh standards.

The guideline stating *'No more than two portions a week of vegetarian or plant-based products which are marketed as meat alternatives (manufactured or homemade). Excludes plain mycoprotein, tofu and soya mince, chunks or pieces'* is intended to limit reliance on processed substitutes that can be high in salt. However, clarity needs to be provided that 'homemade' 'meat alternative' products such as veggie burgers made with pulses and vegetables would be acceptable. In addition, the exclusions could be widened to other low salt/low saturated fat plant alternatives, for example tempeh. This would support innovation and allow caterers to offer wider selection of plant-based main options.

Fish is an important protein source to encourage in schools, but this should be sustainably sourced – this should be added in the current text.

With regards to protein food provision, we would also suggest that the following could be considered in the standards:

- local supply chains/animal welfare criteria
- standards around saturated fat e.g. using lower fat mince, leaner cuts of meat
- recommendations for substituting some meat with beans / how to encourage some substitution or hybrid options with high fibre plant base protein main ingredients like beans and pulses,

32. EYFS nutrition guidance for maintained nurseries

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

Position (**Strongly agree** / Agree / Neutral / Disagree / Strongly disagree):

Early years (pre-school) children have specific nutrition/dietary and portion size requirements which are addressed in the Early Years Foundation Stage (EYFS) nutrition guidance. Maintaining separate requirements for this age group (vs primary schools) allows for a more tailored and developmentally appropriate approach. EYFS guidance reflects the specific needs of younger children and together controls on nutrient such as salt and sugar. For example, expectations around limiting sweetened items (e.g yogurts) and meal patterns (e.g. the provision and frequency of desserts) are more stringent, to support balanced intakes. as well as recommendations on salt and sugar, for example more stringent restrictions on sweetened yogurt.

33. Overall impact on nutritional quality of school meals

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

(Agree)

We support the proposed emphasis on increasing fruit, vegetable and fibre intake, while reducing free sugars, saturated fat and salt within school meals. However, it is important to recognise that nutritional standards alone can only achieve part of the desired improvement in children's diets and food choices.

There are a number of important considerations in the translation of the improved standards to the improvement of nutritional quality – compliance to the school food standards, cost of implementation/increased waste, and any unintended consequences most notably a reduction in uptake – food can only be nutritious if it is eaten. Enforcement, monitoring and data driven learning will be important in ensuring standards are translated to better nutritional intakes in schools.

Although schools are best placed to determine the nature of reasonable adjustments to food provision, taking into account the individual circumstances of pupils and their families, as well as their obligations under the School Food Standards, we believe that additional guidance and support would be beneficial. Schools are increasingly supporting pupils with a wide range of dietary, medical, cultural and educational needs, making decisions around

food provision increasingly complex. Clearer guidance would help schools deliver consistent and appropriate support while ensuring that no child experiences reduced attendance or participation as a result of unsuitable food provision.

The guidance would be strengthened by the inclusion of practical case studies that illustrate effective approaches to meeting diverse dietary needs in school settings. There is also an opportunity to improve recognition of cultural and religious diversity within the guidance.

Consideration should be given to a broad range of dietary requirements and preferences, including halal, kosher, vegetarian and vegan diets, alongside the needs of pupils with special educational needs and disabilities (SEND). For example, guidance on food presentation and dining environments may support pupils with autism and sensory sensitivities to participate more fully in school meals.

While this consultation focuses on nutrient and food and drink standards, it is important to recognise that wider aspects of the school food environment also play a significant role in shaping children's dietary behaviours, food preferences and long-term food culture.

Consideration should therefore be given to:

- The physical environment of school dining halls, including factors that influence comfort, accessibility and the overall dining experience. Queues and being rushed at lunchtime can prompt pupils to purchase less nutritionally balanced food options (that are portable and more easily consumed without sitting down).
- The social environment of school dining halls, including opportunities to encourage positive social norms around healthy eating.
- Interventions that are responsive to local levels of deprivation and the social and cultural context of individual communities.
- Meaningful engagement of children and young people in the design, implementation and evaluation of improvements to school food provision.
- Measures to improve the food environment beyond the school gate, including appropriate controls on the density and operation of food outlets in the vicinity of schools.

Lack of clear responsibility/ leadership/oversight, monitoring and evaluation has been highlighted as contributing to low compliance with the SFS. In schools located in areas of high deprivation, the focus on food provision may have been prioritised within the context of food insecurity, with a primary concern being that school pupils do not go hungry. This remains an important concern. Addressing these wider determinants alongside nutritional standards would help maximise school meal uptake, support healthier food choices, and contribute to lasting improvements in children's health and wellbeing.

Section 3 response

Implementing the new standards

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

The British Nutrition Foundation consulted with its English Education Working Group, which includes practising primary and secondary teachers, to identify practical challenges that schools might encounter. The Foundation also had discussions with the School Food People to get the views of school caterers to inform this response.

Schools may encounter several practical challenges when implementing the new School Food Standards. A key issue is time and space. In many secondary schools, lunch breaks are short and dining areas cannot accommodate all pupils at once, which encourages a “grab and go” culture rather than sit-down meals. Schools may also face staffing and resource pressures, with catering teams already stretched and, in some cases, external caterers withdrawing because of financial pressures. In addition, there may be resistance or slow adoption from staff and caterers if the scale of the changes is underestimated and adequate time is not allowed for changes to be made and staff trained appropriately.

There are also important inclusion and affordability considerations. Schools will need to ensure that changes do not disadvantage pupils receiving free school meals, particularly where funding does not reflect the true cost of a meal and avoid creating stigma through limited or separate options. Pupils with SEND or neurodivergence may find menu changes and busy dining environments difficult, so consistency, flexibility, and inclusive planning will be important. More broadly, successful implementation is likely to depend on clear communication with parents/carers, pupils, staff, and governors, alongside training, monitoring, and practical support to help schools make the changes effectively.

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?

Position (**Strongly agree** / Agree / Neutral / Disagree / Strongly disagree):

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?

Position (**Strongly agree** / Agree / Neutral / Disagree / Strongly disagree):

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

Through consultation with practising primary and secondary teachers and the Foundation’s extensive experience of working with a large number of schools and teachers, the British Nutrition Foundation recommends that schools could take a number of practical steps to help ensure they meet the School Food Standards. First, they could make healthier choices easier within the time and space constraints they face, for example by improving the layout of service counters, grouping popular ‘pick and mix’ items together for quicker service, and providing water fountains in canteens to promote healthier drinks. Schools could also involve pupils directly in menu development through tasting sessions, student councils, and voting on new dishes, which may increase acceptance and give pupils a greater sense of ownership over changes.

Clear communication and a whole-school approach would also be important. Publishing menus for parents, holding tasting events, and promoting school food through assemblies or wider school communications could help build support and manage expectations. Schools could strengthen inclusion by ensuring menus and dining arrangements work for pupils receiving free school meals and for those with SEND or neurodivergence, including

by maintaining consistency and reducing stigma. Finally, schools are more likely to meet the standards if there is strong accountability and support in place, such as a named governor with responsibility for food, access to training for catering staff and governors, clear food policies, and regular monitoring or inspection to keep implementation on track. In addition, food and nutrition education could help schools meet the School Food Standards by building a stronger whole-school culture around healthy eating. When food is treated as part of school life, not just something served in the canteen, pupils may be more likely to understand and accept healthier choices. Linking classroom learning, cooking activities, and wider discussions about food with what is offered in the canteen could reinforce the standards and make changes feel more meaningful rather than imposed.

Food and nutrition education could also support better engagement from pupils, parents, and staff. Helping pupils understand why menus are changing and involving them in discussions or activities related to food, could increase acceptance and strengthen their sense of ownership. The British Nutrition Foundation's ***Food – a fact of life*** (FFL) programme equips children and young people with the food knowledge, skills and confidence to make healthy food choices for life, through expert education resources and training for every stage.

The content is developed by qualified teachers, with support from nutrition scientists, providing up-to-date, evidence-based information about food and nutrition and so may be a useful tool.

It may also support communication with families and encourage a more joined-up approach across education, catering, and school leadership. Building on steps already being taken through the review of the national curriculum and Ofsted's focus on schools' approaches to promoting healthy eating, giving food and nutrition education greater priority could help raise the profile of school food and support more consistent implementation of the standards.

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

Through consultation with practising primary and secondary teachers and the Foundation's extensive experience of working with a large number of schools and teachers, the British Nutrition Foundation believes that government could help schools meet the School Food Standards through a combination of funding, guidance, training, and accountability. Increased funding would be an important starting point, particularly where schools and caterers are facing staffing and resource pressures or where free school meal funding does not reflect the true cost of providing a healthy meal. Government could also support schools by either providing (or commissioning other organisations to develop and produce) clearer guidance, practical implementation resources, and standardised templates for food policies, helping to reduce workload and make expectations more consistent.

Training and monitoring could also play a significant role. Government-provided, or government commissioned, training for catering staff, governors, and school leaders could improve understanding of the standards and support more effective implementation, including around inclusion and diversity. Regular monitoring or inspection, including through existing accountability mechanisms such as Ofsted or Environmental Health, could help ensure that food standards are treated as a priority. In addition, government could strengthen implementation by giving greater priority to food and nutrition education and by promoting whole-school approaches that link catering, food and nutrition education, communication with students and parents/carers, and leadership.