

Healthy eating in schools

For Contacts: Wales

For Information: Contacts England, Northern Ireland, and Scotland

1 Overview

On the 20 May 2025 the Welsh Government published a consultation seeking views on proposals related to food and drink in maintained primary schools in Wales. In addition, they are also calling for evidence on the food provided in secondary school. The deadline for responses is 29 July 2025.

This briefing provides an overview of the consultation, and the full consultation document can be accessed by clicking [here](#).

2 Why the government are making changes

The government are looking to update the food and nutritional regulations and guidance based on the latest dietary recommendations to ensure every Welsh child has healthier food at school.

It is advised that the updated approach aims to: -

Help all children access the food they need for a healthy diet, including those with special or medical dietary needs

- Provide age-appropriate portion sizes
- Support schools, caterers, and partners to put these new regulations into practice
- Balance healthier food with maintaining school favourites
- Make it clear who is responsible for promoting healthy eating in schools and support them to fulfil this duty

The document states that Wales leads the UK in providing free school meals to all primary

school children and believes that this is an important step to help tackle child poverty and hunger, supports learners to achieve, and contribute toward improved health, making a real difference in schools and communities across Wales.

3 What the consultation covers

Views are being sought on three areas of school food provision, primary schools: new proposals for food and drink, healthy eating promotion: clearer guidance on responsibilities and secondary schools: a call for evidence about current food and drink.

4 The government's approach

In this section of the consultation document the government set out their approach which includes providing an overview of current school food provision, the policies supporting health through school food, why it matters for education, health and the wider benefits of school food.

An overview of the progress that has been made since the current regulations were introduced in 2013, an overview of the wider context and details regarding how the proposal has been developed and why strengthening the standards is seen as a vital step forward.

5 Part 1: the regulations and guidance for catering providers

5.1 Current Regulations

The government states that the current regulations set out what school breakfast and lunch should consist of for nursery, primary and secondary learners in Wales. They include food and drink requirements which describe:

- Food and drink that must be provided within schools
- Food and drink that must be limited within schools
- Food and drink that are not permitted in schools

They also include nutritional standards that set out how much energy and nutrients an average school lunch must contain.

5.2 Current Guidance

Alongside the regulations, there is statutory guidance divided into two chapters:

Chapter 1 - Explains the duties that local authorities and governing bodies of maintained

schools must fulfil under the Healthy Eating in Schools Measure, including their responsibility to promote healthy eating and drinking.

Chapter 2 - Provides practical guidance to school caterers on implementing the food and nutritional standards.

Together, it is reported that these documents help ensure learners can access appetising, nutritionally balanced meals while learning about the benefits of healthy eating and drinking.

5.3 Why the government are updating primary school food regulations

Since the current regulations were introduced, the government advise that several developments have occurred:

- UK dietary guidelines have been updated based on recommendations from the Scientific Advisory Committee on Nutrition (SACN)
 - The universal provision of free school meals in primary schools has created a renewed opportunity to continue improving school food and healthy eating.
 - Demand for special diets has increased with the universal offer in primary schools.

The government recognises that the current guidance doesn't adequately address:

- When to provide food for 'medically prescribed dietary requirements'.
 - Other important dietary considerations.

These areas have been reviewed as part of our work to update the regulations and guidance.

5.4 Proposed changes for Nursery and Primary School Lunch

An overview of the following proposed changes are set out in 'Annex A: on the main consultation page.

It is proposed that these regulations will apply to nursery children provided with school lunch as well as primary aged children in full time-maintained education.

5.5 Fruit and Vegetables

Currently regulations require one portion of fruit and one portion of vegetables daily.

It is reported that fruit and vegetables should make up over a third of a healthy diet as they provide essential vitamins, minerals and fibre. Most Welsh children don't eat the recommended five portions a day, with children from poorer households eating the least, which shows vegetable consumption is lower than fruit consumption among primary pupils.

The proposed changes

- At least two portions of vegetables must be provided daily.
- At least six different varieties of vegetables must be provided weekly.
- Daily fruit portion requirement continues, with at least four different varieties provided weekly.

5.6 Starchy carbohydrates

Currently, there are no standards for starchy carbohydrates. It is stated that according to the Eatwell Guide, the UK's official healthy eating model, meals should be based on starchy foods, preferably higher fibre or wholegrain varieties. These provide energy and important nutrients, including fibre. The UK dietary recommendation for ages 5 to 11 is 20 grams of fibre daily but few children meet this target.

The proposed changes

- A portion of starchy carbohydrates must be provided at least three times each week.
- At least one portion of pasta, noodles or rice must be provided each week and must contain at least 50% wholegrain. Bread must be at least 50% wholegrain.

Beans, Pulses, Fish, Eggs, Meat and Other Protein

Current regulations require meat cuts at least twice weekly (this does not stipulate whether it is red or white meat), limit processed meat to no more than twice weekly and require fish once weekly with oily fish every two weeks. There are no requirements for other protein sources.

Protein is essential and provides important vitamins and minerals. We need a balanced approach offering various protein sources throughout the week, including fish, lean white and red meat, pulses and beans.

UK dietary recommendations advise limiting red and processed meat consumption as eating too much is linked to an increased risk of cancer. However, red meat, in moderation, is a good source of beneficial nutrients like iron, zinc and B vitamins.

The government proposes reclassifying ham, gammon and bacon from meat cuts to processed meats, as they're classified as processed in UK dietary advice.

While oily fish (high in beneficial omega-3 fatty acids) is currently required every two weeks, evidence shows high food waste when it's served and lower meal uptake on these days. Reducing the frequency while still offering exposure to oily fish helps address waste issues.

There is also evidence that non-meat alternatives provided daily are often cheese-based. Also, there have been increases in the availability and variety of processed alternatives to meat or fish. These can be high in salt and/or fat and low in fibre and aren't required as part of a healthy balanced diet. Non-meat protein alternatives that are high in fibre and low in fat such as beans, pulses, and eggs, as recommended in the Eatwell Guide, are healthier choices. The Welsh Government states that it wants to ensure school food supports healthy balanced meals for vegetarians and those that choose non-meat options.

The proposed changes

- At least one portion of red meat (but no more than two) must be provided each week.
- Processed meat or products containing meat limited to once a week.
- No limits on white meat cuts.
- Oily fish must be provided once every four weeks.
- Processed alternatives to meat and fish limited to twice weekly.
- Lunch where cheese is the main protein source limited to twice weekly.

5.7 Potatoes cooked in oil and fried foods

Currently, potatoes or potato products cooked in oil and deep-fried or flash-fried products are limited to twice weekly each.

These foods contribute significantly to calories, fat and trans fats. UK guidelines advise reducing all fats. Children should get most calories from fruit, vegetables and wholegrain starchy foods.

The proposed changes

- Potato or potato products cooked in fat or oil limited to twice weekly, with no more than one of those portions being deep-fried.
- Deep-fried or flash-fried food limited to once weekly (including manufactured products or those prepared on school premises with coating or breadcrumbs containing oil).

5.8 Pastry and pastry products

Currently, there are no requirements for pastry products.

Pastry is generally high in saturated fat and may contribute to salt and sugar consumption. Too much saturated fat is bad for children's health.

The proposed change

Pastry or products containing pastry (sweet or savoury) limited to once weekly.

5.9 Desserts

Currently, there's no limit on sweetened baked goods and desserts, though fruitbased desserts must be provided twice weekly.

Traditional primary school meals include a main dish and dessert. While desserts can provide nutrients and are often children's favourite part of the meal, they can be high in sugar, fat and saturated fat. They can also establish the habit of expecting sweet treats with every meal. Evidence shows that children in Wales exceed the recommended intakes for free sugars and saturated fat.

The Eatwell Guide shows that high-fat, high-sugar foods should be occasional treats in smaller portions, not regular parts of the diet.

The proposed changes

- Sweetened baked products and desserts limited to three times weekly (excluding milk-based desserts like yoghurt, custard and rice pudding).
- All desserts must contain or be served with a dessert portion of fruit or vegetables.
- Other dessert options like fruit, yoghurt, and cheese and crackers can continue to be offered as healthier alternatives.

5.10 Drinks

An overview of the proposed changes are set out in Annex A on the main consultation page.

Currently, a range of drinks, including water, milk, fruit or vegetable juice, plant-based drinks, and combination or blended drinks are permitted.

The most appropriate drinks for children are water and milk. Children should avoid sugary drinks completely. A quarter of children's daily sugar comes from sugary drinks, which are linked to obesity and tooth decay.

The proposed changes

- Only plain water, plain milk and plain plant-based drinks will be permitted.
- Fruit juice will no longer be permitted due to its sugar content.

Portion sizes (Nutritional standards)

An overview of the following proposed changes are set out in 'Annex A: on the main consultation page.

Currently, a universal portion size is provided for all learners. The nutrient standards are based on lunch providing 30% of daily macronutrient requirements and an increased percentage for micronutrients, reflecting the importance of school lunch for children's nutrition.

Current standards were calculated based on 60% of pupils being ages 4 to 6 and 40% ages 7 to 10.

The government states that they do not intend to change the nutritional contribution of school lunches, but we want to better reflect children's different dietary needs by age. Young children often get too much food, leading to overeating or waste, while some older pupils report feeling hungry after meals.

The proposed changes

- Two different portion sizes: one for infants (Nursery to Year 2) and one for juniors (Year 3 to Year 6).
- Maximum portion sizes for foods that should be limited, minimum portion sizes for foods to be promoted.
- Supplementary bread (50% wholemeal) must be available to all learners (not included in nutritional analysis).
- Average school lunch calculation based on 1-to-4-week menu cycle rather than weekly.
- Daily 15% tolerance for energy provision.

To further support learners with larger appetites, the Guidance will propose minimum or maximum quantities for portions rather than including suggested portion size ranges. This will encourage meals that are based on starchy carbohydrates with plenty of fruit and vegetables, as suggested by the Eatwell Guide.

5.11 Proposed changes for Primary School Breakfast

An overview of the following proposed changes are set out in 'Annex A: on the main consultation page.

Currently, four food categories must be provided at breakfast:

- Milk-based drinks and yoghurts.
- Cereals (not coated with sugar/chocolate/cocoa powder).
- Fruit and vegetables.
- Breads and toppings.

UK dietary recommendations state free sugars should not exceed 5% of energy intake, and fruit juice contributes significantly to free sugar intake. Additionally, few children meet the 20g daily fibre recommendation for ages 5 to 11.

The proposed changes

- Fruit juice is no longer included in the fruit definition due to its free sugar content.
- All bread must be 50% wholemeal.
- Separate portion sizes for juniors and infants provided in statutory guidance.

5.12 Understanding the Regulations Guidance

Clear information for caterers

The government states that they have made the guidance simpler with clear definitions and straightforward terminology. For each requirement, it is advised that they provide:

- Specific portion sizes for infants and juniors.
- One portion size for both age groups where pre-prepared products can't be divided. Recommendations for exceeding the standards.
- Encouragement to be aspirational and continuously improve.

The guidance also includes:

- information about medically prescribed dietary requirements
- clarity about other dietary needs
- which foods served during the school day must follow the regulations in the details about exemptions for medical diets and school trips

Special diets

In the consultation document it is stated that two key issues are addressed:

1. Inconsistent practices for Medically Prescribed Dietary Requirements (MPDR).
2. Confusion about supporting children with non-prescribed dietary needs.

The revised guidance clarifies that:

- without a medically prescribed diet, any adjusted food must still comply with the Healthy Eating Regulations
- school caterers should assess any risks when adjusting meals
- professional advice should be sought when appropriate

For medically prescribed diets:

- the Healthy Eating Regulations don't apply to food and drink provided as part of MPDR
- medical practitioners or dieticians may prescribe specific foods or advise avoiding certain foods
- school meal providers should still encourage healthier options that align with the regulations and guidance where possible

- meal providers can still apply reasonable restrictions at their discretion.

6 Part 2: promoting healthy eating and drinking in schools

6.1 New guidance for schools and local authorities

The current guidance (Chapter 1) outlines responsibilities for local authorities and school governing bodies under the Healthy Eating in Schools Measure.

These duties include:

- Taking action to promote healthy eating and drinking in schools.
- Including information about healthy eating and drinking promotion in annual governing body reports.
- Ensuring free drinking water is available on school premises.
- Encouraging pupils to take up school meals and milk.
- Making sure eligible pupils receive their free school meals and milk.
- Protecting the identity of pupils eligible for free school meals and milk.

Estyn also has a duty to keep Welsh Ministers informed about actions taken in maintained schools to promote healthy eating and drinking.

The government states that they are making changes due the discussions that have been held with their partners and they have learned that the current guidance does not:

- provide clear enough advice on how to fulfil these duties
- clearly explain who is responsible for specific duties in different situations

The new approach

The government has created a new, standalone guidance document that:

- clearly sets out the duties of local authorities, governing bodies and Estyn
- applies to all maintained schools in Wales
- explains what actions must be taken to meet these requirements
- provides practical examples of how to demonstrate compliance

It is stated that this clearer guidance will help ensure that healthy eating and drinking is promoted effectively in all Welsh schools.

7 Part 3: secondary school food – a call for evidence

7.1 Understanding today's secondary school environment

The government recognises that since the current Regulations and Guidance were introduced in 2013, secondary school eating patterns have changed dramatically. Therefore, there is more information needed to fully understand this complex landscape. Today's secondary schools feature:

- a "grab and go" food culture
- time and space constraints
- staggered and shorter lunch periods (resulting from COVID-19 measures and behaviour management strategies)
- canteens designed for quick service
- cashless payment systems allowing flexible use of free school meal allowances
- wider food choices
- greater student autonomy over what and when they eat, (e.g. morning break vs lunchtime)

It is stated that this is very different from primary schools, where most children sit down together for a traditional two-course plated lunch.

Gathering the evidence needed

To create meaningful updates to the regulations for secondary schools, the government advise that they need more information about what's actually happening in these settings and how young people are choosing to eat in schools.

It is commented that the government has already begun collecting data on food consumption patterns to understand where new regulations could have the most impact.

Your views matter

As part of this consultation, the government are asking for evidence and opinions about secondary school food. Particularly they want to understand:

How can we achieve a nutritionally balanced, appealing food offer in secondary schools?

All evidence and insights are welcome on this topic. Formal research evidence is not required, as relevant knowledge and opinions are valuable too. The government also want to hear directly from young people, as they state that they recognise the importance of their autonomy, choice and food preferences.

APSE Comment

APSE welcomes the consultation into healthy eating in schools as the current standards have been in place for over a decade and a review is long overdue. In that time the eating habits of the population have changed considerably, the population has become more sedentary, home cooking has effectively been outsourced to supermarket convenience meals and take-away delivery services.

With the recent increase in eligibility for free school meals in Wales a review of food standards is imperative as there is an opportunity to positively impact the health, and attainment of a larger portion of Welsh children and young people.

School food will not solve all the issues, but it is one of the measures that can enable children to develop good eating habits that will promote future physical, and dental, health and provide children and young people with the nutrition they require to learn. This in turn can support academic attainment, enhancing future achievements.

A large amount of academic research into the causes of obesity and the impacts of highly processed or ultra processed foods is now available and it is welcome that the Welsh Government refer to this evidence base and are taking it into consideration as part of the review.

Local Authorities from not only Wales but across the UK have highlighted at APSE Roundtable discussions and the APSE Education Network that there has been a rapid acceleration in the number and complexity of special diets which is placing severe pressures on the catering service. In addition, the APSE State of the Market Survey 2025 – Local Authority Catering Service, 96.43% of respondents report that allergens and special diets were a challenge. Therefore, APSE welcomes the acknowledgement of special diets in the consultation and that guidance will be provided. With the caveat that the guidance is practical and achievable for councils, as this will assist in ensuring there is a consistent approach and that there is not a postcode lottery for children with allergens and special dietary needs.

Whilst APSE recognises that the consultation is focused on healthy eating in schools and welcomes the review, it needs to be recognised that providing quality nutritious school meals comes at a cost. The inflationary food, energy, and wage costs since the pandemic have significantly increased the gap between the funding provided per meal and the cost of providing the food on the plate making local authority catering services financial unviable and challenging the future viability of the service.

Therefore, APSE calls on the Welsh Government to review the funding to ensure that the cost of providing a nutritious school meal is comparable to the funding received. The funding

should be seen as an investment, the government have acknowledge the health and attainment benefits of a school meal in the consultation document but there are also wider benefits in terms of procuring produce from the local producers supporting the local economy and providing employment with pay and conditions that are more favourable than of those in the private sector to a largely part-time female workforce, resulting in the reduction on the reliance on benefits, and keeping the spend local.

Vickie Hacking
Principal Advisor

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