

School food standards: Government consultation response

To: England

For information: Northern Ireland, Scotland and Wales

1 Executive summary

The Government has confirmed that it will proceed with most proposed reforms to the School Food Standards in England, with regulations intended for October 2026 and the main requirements applying from September 2027, subject to Parliamentary approval. Selected secondary-school requirements covering healthier drinks, cheese and pulses will follow in September 2028. The response follows 5,216 consultation submissions; 72% of respondents believed the proposals would improve nutritional quality.

- Dedicated breakfast standards will set a permitted, lower-sugar and higher-fibre offer, including a required starchy carbohydrate and fruit or vegetables.
- Fruit, vegetables and fibre requirements will be strengthened; all main items must include or be served with vegetables or salad, and pasta dishes on at least one day each week must contain at least 50% wholewheat pasta.
- Free fresh drinking water remains mandatory. Fruit juice will not be permitted in school meal services, and tighter drink rules will be phased for secondary schools.
- Deep-fried foods will be prohibited, while weekly limits will apply to processed meat, pastry, breadcrumb-coated foods, cheese-based items and sweetened desserts.
- Every main item must contain a protein source, with a stronger role for pulses and nutritionally suitable plant-based provision.
- Schools will be expected to appoint a lead governor for school food and publish their food policy and menus online, supported by a new national compliance framework.

2 Government decisions

The revised framework moves beyond lunch to regulate breakfast, snacks, vending, tuck shops,

grab-and-go and other food provided across the school day. Breakfast provision will have a defined list of permitted foods and drinks. Honey, syrups, chocolate spreads and most sweet additions will remain restricted; breakfast cereals may contain no more than 5.5g sugar per 100g, while manufactured bread must contain at least 4g fibre and no more than 5g fat per 100g. Processed meat will not be permitted in primary-school breakfasts; secondary schools may serve one specified processed-meat portion per week either at breakfast or elsewhere in the school day.

Primary schools will be limited to one sweetened baked product or dessert each week; secondary schools may serve two. All such items must include a full fruit or vegetable portion, either within the item or supplemented alongside it. Foods containing cheese will be limited to two portions weekly, with a three-portion transition for secondary schools in 2027/28. Pulses must feature alongside all main menu choices at least weekly, with a one-year secondary transition of once every two weeks. Guidance is promised on reasonable adjustments for pupils with SEND, neurodivergence, sensory needs, allergies, medical diets and faith or cultural requirements.

3.1 Monitoring, compliance and provider accountability

From September 2027, the revised standards will be supported by a national compliance framework. The Government is developing a national monitoring system with input from the Food Standards Agency, drawing on its expertise in food regulation and assurance. Detailed arrangements have not yet been published, but the stated approach combines statutory requirements with clearer school-level governance, greater transparency, practical guidance, training and proportionate monitoring.

Schools will be expected to appoint a lead governor for school food and publish their school food policy and menus online. These measures are intended to make responsibility visible to governing bodies, parents and pupils, and to provide an accessible record against which provision can be assessed. Relevant information from the national monitoring system may also be shared with Ofsted. Inspectors will not grade schools on school food or compliance with the standards, but the information may inform wider discussions about leadership and governance.

The legal duty will continue to rest with schools and their governing bodies or trusts, rather than being transferred to catering contractors. Caterers should therefore be held accountable through procurement specifications, contract terms and routine client monitoring. Where breakfast, lunch, vending or after-school food is delivered by different providers, the school or commissioning authority will need clear overall responsibility for checking compliance across the whole school day.

- **Contract specifications:** translate each statutory requirement into measurable menu, product, frequency, drinks, allergen and reporting obligations, including responsibilities where more than one provider operates on a site.
- **Evidence:** require current menu cycles, ingredient and product specifications, nutritional analysis where appropriate, records of substitutions, and evidence that free fresh drinking water is continuously available.
- **Routine checks:** combine desktop menu reviews with proportionate site visits, meal observations and spot checks covering breakfast, lunch, vending, tuck shops and other in-scope provision.
- **Performance reporting:** review compliance alongside meal uptake, food waste, customer feedback, complaints, reasonable adjustments and service resilience, so nutritional compliance is not achieved at the expense of participation or inclusion.
- **Escalation:** use corrective action plans, agreed timescales, follow-up checks and contractual remedies for repeated or material non-compliance, with serious concerns reported through the school's governance structure.
- **Transparency:** ensure published menus accurately reflect what is served and explain material substitutions or temporary departures from normal provision.

3 Implications for local government

Councils should treat September 2027 as an operational deadline rather than a distant policy date. Menu cycles, ingredient specifications, allergen controls, kitchen capacity, workforce skills, vending arrangements and contract terms will need review well before regulations take effect. Where different providers operate breakfast, lunch and after-school provision, authorities and schools will need a single line of oversight so weekly limits and whole-day requirements are applied consistently.

- **Finance:** model the effect of ingredient, labour, energy, training and equipment costs, alongside possible changes in paid-meal take-up and food waste.
- **Procurement and contracts:** map renewal dates, amend specifications, test supplier capacity for compliant bread, cereals, drinks and plant-based products, and clarify responsibility where services are split.
- **Workforce and kitchens:** identify recipe-development, production and training needs, including equipment constraints and the capacity to prepare appealing higher-fibre and pulse-based dishes.
- **Pupil engagement:** use tasting, phased menu trials and feedback—particularly in secondary schools—to protect uptake and minimise waste.
- **Governance:** align contract monitoring, school self-assessment, published menus and the lead-governor role with the emerging national compliance framework.
- **Inclusion:** document reasonable-adjustment routes and maintain safe, culturally

appropriate and familiar options where pupils have clinical, sensory or religious needs.

4 APSE's evidence and wider work

The consultation response closely reflects issues identified in APSE's research. [Local authority education catering service: More than just a service](#) found that more than half of respondents considered free school meal funding inadequate, 83.16% supported ringfencing that funding and only 41.30% of surveyed councils subsidised their catering service. Its five recommendations call for recognition of the wider social and economic value of school catering, funding that reflects that value, ringfenced school-meal funding, reconsideration of market-based models and acceptance that subsidy can be necessary to sustain a public service.

This briefing should also be read alongside [APSE Briefing 26/19, School Food Standards: Updating the legislative framework \(April 2026\)](#), which summarised the original consultation proposals and APSE's initial position. That earlier briefing welcomed the direction of travel on fibre, sugar reduction, breakfast provision and governance, while warning that wholegrain products, fresh produce and pulses could add pressure to food budgets, supply chains and kitchen capacity.

The final response addresses some of those concerns through greater flexibility and phased secondary-school implementation, but it does not remove the underlying need for adequate funding, realistic lead-in time and clear national guidance.

4.1 Operational and market evidence

APSE's [State of the Market 2026: Local authority catering services](#) examines workload, staffing, school-meal prices, cost pressures, mitigation measures and sustainability. Read alongside [The future of local authority education catering services](#), it underlines that new statutory expectations arrive while many services are already reviewing delivery models and managing financial, workforce and policy pressures. APSE's work on the [impact of food costs on school meals](#) also records concerns about quality, menus, prices, debt and service resilience. The policy objective is therefore credible, but delivery will depend on whether funding and implementation support match the scale of change.

4.2 Performance and assurance

[APSE Performance Networks](#) already benchmarks catering costs, productivity, staffing, customer satisfaction, free and paid meal uptake, nutrient standards, subsidy and meals served per staff hour. Authorities can use this evidence base to establish a pre-implementation baseline and monitor whether healthier menus improve quality without unintentionally reducing take-up, productivity or financial resilience.

5 APSE Comment

APSE supports the ambition to improve children's nutrition and welcomes the Government's willingness to adjust several proposals where consultation evidence identified practical risks. The decisive test, however, will be whether implementation is funded as a service transformation rather than treated as a compliance exercise. Higher-fibre products, recipe reformulation, training, equipment, contract variation, monitoring and sustained pupil engagement all carry costs. If these pressures are absorbed within already stretched meal prices, councils may face an avoidable trade-off between compliance, quality and take-up.

The new framework should therefore be accompanied by transparent cost modelling, sufficient and preferably ringfenced funding, practical national guidance and a proportionate assurance system.

APSE welcomes the intention to introduce a national compliance framework, but monitoring must be consistent, properly resourced and focused on improvement rather than creating an additional administrative burden. Government should set clear evidence requirements and lines of accountability, while allowing councils and schools to use proportionate contract management, menu checks, site visits and corrective action plans to hold catering providers to account. Published menus and policies will improve transparency, but they must be supported by checks that what is advertised is routinely served. Monitoring should also assess meal uptake, food waste, affordability, inclusion and pupil feedback, so that technical compliance does not mask poorer participation or unintended consequences. Local authority catering services are well placed to coordinate procurement, menu development, workforce training, public health priorities and inclusive provision at scale.

Government should use the implementation period to work directly with councils and caterers, test guidance against real operating conditions and establish a fair route for addressing non-compliance. Success should be judged by whether children choose and eat nutritious meals, and whether services remain affordable, resilient and accessible.

On a final point, whilst many local authorities adopt policies which support prevention, sadly, in the case of school meals, decisions have consistently been made which have forced local caterers to work on the basis of full cost recovery or minimisation of any necessary subsidy. This is inconsistent with the often stated aims of utilising school meals as a means to address child health and nutrition, child poverty initiatives, and ill-health prevention. In the case of the new standards if the impact is to add further costs to local authority caterers this may well exacerbate the existing decline in direct provision of local authority catering services. This approach is counterintuitive to supporting local outcomes including the secure employment of often low paid part-time women, development of local skills and the use of local food supply chains wherever possible, which all contribute to social value outcomes'.

The transition to the new School Food Standards and the wider challenges facing the sector will be discussed through [APSE's Education Catering Networks](#) and at the APSE Soft FM Seminar on 28 January 2027. These forums will provide opportunities for member authorities to consider the practical implications, share emerging approaches and identify the support needed to deliver the revised standards effectively.

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