

Official Response
to the Government Consultation

**School food
standards: updating
the legislative
framework**



About **Community Union**

This is an official response on behalf of members of Community Union

Community is a general Trade Union affiliated to the TUC. We provide legal and casework support to our members and regularly engage with them in determining our response to policy proposals.

Community's Education and Early Years sector represent thousands of serving teachers and support staff, headteachers, lecturers, nursery and early years workers, nannies and other education professionals in schools and academies, nurseries and early years settings, colleges, and universities across the whole of the UK.

This evidence was submitted on behalf of our members working in Early Years and Education in England and as such represents the collective view of our membership.

The information shared within this response is our public response to the consultation and may be used and quoted as appropriate for the purposes it was gathered, with Community Union acknowledged as the contributor. We would be happy to discuss the comments in this response further, please contact us using the details supplied.

This Official Response will be published on our website following the close of the consultation period.

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Opening Statement

School meals are a vital public service. For millions of children across England, they represent far more than just food, they are a guaranteed source of nutrition, warmth, and stability in an otherwise uncertain day. Sadly, for a significant number of children, school dinner is the only hot meal they will receive, and for a small but deeply vulnerable proportion, it may be the only meal of any sort. This reality must sit at the very heart of how we approach any reform of the School Food Standards.

We welcome the government's commitment to updating standards that are now over a decade old, and we share the ambition to ensure that every child has access to healthy, nutritious food during the school day. The statistics cited in this consultation are stark and cannot be ignored. Over 10% of children start school with obesity, rising to more than 22% by the end of primary school and approaching 30% in the most deprived areas. This is a serious public health concern that demands a serious response. However, Communities are clear that schools did not create this crisis, and school meals alone cannot solve it. These standards must be seen as one part of a much broader response where government, schools, parents, and health services work together to promote children's health and wellbeing.

We must also be vigilant about unintended consequences. Standards that are too restrictive, too unfamiliar, or too far removed from children's and families' expectations risk children simply stopping eating school meals. Parents who feel there is nothing familiar or appropriate for their child on the menu will withdraw them from the service. Children who find nothing appetising will go hungry, bring in packed lunches over which schools have no oversight, or resort to confectionery and snacks from home, directly undermining the very sugar and fat reduction objectives these reforms seek to achieve.

Schools across the UK serve extraordinarily diverse populations, with different cultural traditions, religious dietary requirements, medical needs, and sensory preferences. A single standardised menu applied uniformly across all of England's schools is unlikely to be appropriate or desirable. Instead, menus should reflect the communities they serve, while also broadening children's horizons, for example introducing them to cuisines and ingredients from around the world alongside the familiar, nostalgic favourites that have always made school dinners a positive shared experience.

The balance between the new and the familiar is not a compromise, it is the key to success. Healthy food must also be attractive, enjoyable, and recognisable if children are to choose it willingly and consistently.

Finally, as with all change, there is a financial burden. Sourcing local, high-quality, fresh ingredients and preparing meals to a higher nutritional standard will cost more than relying on processed convenience foods. Communities call on the government to make a firm and ongoing commitment to increasing per-meal funding in line with the higher standards being demanded, ensuring that schools and caterers are genuinely equipped to deliver the improvements every child in England deserves.

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?

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

Community broadly agree with the proposed new breakfast standards. For example, increasing fibre through wholegrains, vegetables, pulses, and fruit is nutritionally sound and long overdue, given the evidence that the vast majority of children fall well short of recommended fibre intake. Similarly, the drive to reduce sugar, particularly in breakfast cereals, drinks and everyday menu items, is strongly supported, as is restricting deep-fried items to reduce unnecessary fat intake at what should be a nourishing start to the day.

However, we have concerns about flexibility in implementation. Breakfast clubs serve an enormously diverse school population, including children from a wide range of cultural and religious backgrounds whose familiar morning foods may not map neatly onto the proposed permitted foods list. A child for whom a particular food is culturally significant should not find school breakfast an alienating experience.

Equally, children with SEND, sensory processing differences, allergies, or medical dietary requirements may have very limited acceptable food repertoires and overly prescriptive standards risk excluding these children from meaningful participation in breakfast provision altogether, which would directly contradict the policy's intent to ensure every child benefits.

With this in mind it is important that the government ensure that any new guidance accompanying the updated standards explicitly addresses these groups, providing schools and caterers with clear, practical frameworks for reasonable adjustments, so that inclusivity is built into implementation from the outset rather than treated as an afterthought.

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

Whilst we acknowledge that processed meats, such as bacon and sausages, contain high levels of saturated fat, salt and preservatives, Community believes that, where appropriate, meat including processed meat can form part of a healthy balanced and nutritious diet when served occasionally and in small quantities as seen in mediterranean countries, and therefore we would not wish for it to be completely forbidden, just restricted.

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

Honey is a natural product that is much better than processed and refined sugars and sweeteners, it contains antioxidants, anti-inflammatory compounds, and trace nutrients that can help to maintain the health of pupils especially sore throats and gut health, however children already consume double the daily recommended sugar intake and honey is still a source of simple carbohydrates. Because it is calorie-dense and high in free sugars we agree that moderation is necessary and recommend fruit as a suitable natural alternative.

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?

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

It is sensible for the food standards to be consistent but the understanding and recognition that there may be different providers catering for breakfast clubs and main schools meals is important. For this reason, it is appropriate for uniform standards to be separated to cover the different parts for the whole of the school day.

Increasing Fibre

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

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

The consultation notes that over 90% of children consume insufficient fibre, together with the health risks in later life so Community agree with the proposals mandating at least 50% wholegrain versions of staples and requiring bread to contain at least 3g/100g fibre is a meaningful, evidence-based intervention.

The practical challenges for schools are real, though. Wholegrain pasta and brown rice take longer to cook and can be less appealing to children accustomed to white varieties, potentially reducing meal uptake and undermining the policy's intent. Higher-fibre ingredients can also cost more, which matters for schools operating on tight catering budgets. Supply chain reliability for specific products (such as 50% wholegrain breads meeting the fibre threshold) may be inconsistent, particularly for smaller schools or those in rural areas like many in England.

There is also a cultural and dietary sensitivity dimension. White rice is a staple part of many familiar dishes and substituting brown rice could make meals feel less familiar and welcoming. It will likely be necessary to take a practical, gradual approach to this change.

Fruit & 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?

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

The recommendations for fruit and vegetables has, for a long time, been to consume at least five portions per day. By ensuring that there is always one portion of vegetables or salad with grab-and-go main meals, this will help to meet that recommendation.

However, Community has concerns that the addition of salad and/or vegetables to every grab-and-go meal will increase the cost of each meal. Therefore, government funding for school meals must increase to cover the increased meal size and ingredients required for all schools, not just those offering funded school meals.

Additional funding will also be required to support schools to ensure that their preparation areas are improved to simultaneously prepare meat products and vegetables in separate, hygienic areas as required.

Finally, provision of fruit and vegetables does not equal consumption. It will be vital for the success of this for vegetables to promoted and seen as an important part of snack food as well as part of a meal to ensure that food is not simply wasted. Community think it will be prudent to monitor waste levels and to ensure that food waste is gathered separately from packaged waste to allow for improved disposal and composting.

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?

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

Community have some reservations about the proposal to restrict primary schools to fruit-only as the sole dessert option one day per week. While we fully support reducing sugar in school food and drink, desserts carry genuine cultural and social value – traditional puddings represent an important shared experience and connection to British food heritage across generations, that should not be dismissed lightly.

More critically, for a meaningful proportion of children, school dinner is the only hot meal, and in some cases the only meal, they receive in a day. For these children, a nourishing hot dessert in winter months is not a luxury but arguably a genuine nutritional and welfare necessity. Sponge pudding with custard is not in and of itself a healthy dessert but does have its place in a school meal rotation and replacing this with fruit alone risks leaving the most vulnerable children significantly worse off.

We would urge the government to instead consider requiring that desserts meet specific sugar and nutritional thresholds rather than eliminating them entirely on designated days. We acknowledge that this could be more difficult to implement and monitor but healthier versions of traditional puddings with fruit, wholegrains and reduced sugar content could satisfy both nutritional and welfare objectives without undermining what school meals mean to children and their families.

Reducing Sugar

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

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

Community is strongly in favour of free, fresh drinking water for all pupils at all times. And we would urge the government to go further and specify that this requires adequate, accessible water fountains and refill stations as a genuine infrastructure expectation, not merely a paper requirement.

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

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

We broadly agree with the proposed list for secondary schools. Community recognise that older pupils have greater autonomy and some financial independence, which means that sugar-free flavoured water and no-added-sugar drinks provide familiar alternatives without the sugar content of fruit juice or carbonated soft-drinks. We would recommend that energy drinks and branded sugary drinks are explicitly prohibited by name, given the significant commercial pressures secondary pupils face.

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

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

We support the phased approach but would argue that September 2028 be treated as a floor rather than a ceiling, with the longer-term ambition of full alignment with primary standards. The phasing gives schools and caterers necessary time to adapt but should not be allowed to become a permanent exemption from the higher, healthier standard.

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?

Drinks are often the single most expensive item on the school menu and catering companies benefit hugely from selling bottled water. As already mentioned, Community is wholly in favour of free, fresh drinking water and supports the role out of accessible water fountains to realise this and reduce the attraction of expensive bottled water. It is not appropriate for bottled water to become the norm in secondary schools.

While a transitional period for secondary schools is pragmatic, there is no compelling long-term case for a permanently different drinks offer. Alignment would create consistency across school stages, support healthy habits, and benefit all pupils equally, regardless of age.

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

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

We neither agree nor disagree with the proposed changes to dairy and plant-based requirements, and note the recognition of plant-based alternatives alongside traditional dairy products. Setting sugar thresholds for yoghurts is a sensible and proportionate measure.

However, we have some concerns about the treatment of cheese within the broader standards. Not all cheese is high in fat — reduced-fat cheddar, cottage cheese, quark, and ricotta are among many lower-fat varieties that could feature regularly in healthy school menus without the saturated fat concerns that appear to motivate the restrictions.

Perhaps most counterintuitively, the proposed standards continue to permit cheese as a sandwich filling without restriction but limit it as a jacket potato topping. These

are nutritionally equivalent uses of the same ingredient, and this inconsistency is difficult to justify. We would urge the government to reconsider this distinction and instead focus restrictions on total cheese portion size and fat content across all menu applications.

Reducing 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?

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

Levels of obesity are high across the UK, and we are regularly encouraged to eat a diet lower in fat, sugar and without added salt, so it is reasonable for the new rules to ensure that foods containing fat, sugar and salt should be restricted.

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

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

Cheese is a valuable and versatile source of protein, calcium, and other micronutrients, and should not be characterised primarily as a problem ingredient. As already noted, not all cheese is high in fat and therefore cheese and non-dairy cheese alternatives could feature regularly in healthy school menus without the saturated fat concerns that appear to motivate the restrictions.

The inclusion of non-dairy milk-based cheese alongside dairy cheese is a welcome inclusion making it an inclusive option for a wide range of dietary needs and cultural backgrounds, but Community would encourage schools to continue to offer both dairy and non-dairy types to ensure meeting as wide a need as possible.

Again, as noted earlier, we are confused by the proposal to restrict cheese as a topping on hot food, including pizza and jacket potatoes whilst permitting it as a sandwich filling without restriction. This inconsistency is difficult to justify, and we would urge the government to reconsider this point.

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?

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

Please see previous comments on the benefit of cheese as part of a healthy diet.

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

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

As noted earlier, Community do not agree with the automatic assumption that desserts are inherently unhealthy and need to be restricted in primary schools. Whilst we agree with the proposals to reduce sugar and fat content in school meals, this should not automatically mean that desserts are reduced. Indeed, the proposals make clear that fruit should be available as a dessert option.

We have already highlighted the importance of school dinners being the only hot meal of the day for many children. Restricting dessert options, particularly hot puddings during winter months, removes a meaningful source of nutrition and comfort for those children most dependent on school food provision.

We are also concerned about a significant unintended consequence. Reducing the appeal of school lunches risks driving children, particularly in primary schools where parental influence remains strong, back towards packed lunches, over which schools have no nutritional oversight. Furthermore, children denied a sweet option at lunch may resort to bringing in chocolate bars and sweets from home, entirely undermining the sugar reduction objectives at the heart of these reforms.

We would urge the government to instead focus on improving the nutritional profile of desserts through sugar and fat thresholds, rather than restricting their frequency, ensuring school meals remain attractive, inclusive, and genuinely competitive with the alternatives.

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

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

As noted above, whilst we agree with the proposals to reduce sugar and fat content in school meals, this should not automatically mean that desserts are reduced.

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

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

Please see previous answer.

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

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

Community agree that drinks should not be part of a meal deal. But we note that the consultation is not clear on what other items may or may not be included, for example, there is no restriction on the main food item, no limits on portion size, and no requirement for the overall meal deal to meet broader nutritional standards around fat, salt, or sugar.

Nor is there any pricing guidance. We know that many vulnerable pupils will be attracted by the “meal deal” promotion, despite the fact that it may not be as cost effective or nutritional as individual items.

It will be important for the final guidance to set out the expectations around the inclusion of vegetables – including portion size, to ensure that it is meaningful and appropriate for the age and stage of the pupil and not something from which catering companies can benefit.

Protein Changes

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?

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain

We broadly support the proposal to incorporate pulses into school menus alongside meat and poultry as a protein source, however, there are some important practical and environmental considerations.

While pulses are generally cheaper than meat as a raw ingredient, this is unlikely to result in lower meal prices, the costs of developing new recipes, staff training and the convenience premium of canned pulses are likely to absorb much of any ingredient saving. Schools and caterers should not be expected to deliver these changes without adequate transitional financial support.

Pulses have a compelling environmental case with lower carbon emissions, reduced water consumption and soil-enriching nitrogen-fixing properties that reduce fertiliser dependency. However, we urge the government to consider carefully the question of provenance and food miles. British meat benefits from well-established short supply chains and is often locally sourced for school meals. By contrast, many pulses consumed in the UK are imported from Canada, Australia, and the Middle East, which undermines the environmental benefits.

Therefore, we would strongly argue that any expansion of pulses in school food should explicitly prioritise British-grown varieties wherever available and that pulses are served alongside and within meat-based meals as well as being included as a discrete protein. It may be appropriate for the Department to coordinate with DEFRA over their forthcoming food strategy to develop domestic pulse supply chains capable of meeting increased school food demand.

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

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain
See comment above

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

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain
See comment above

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?

Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Please explain
As noted earlier, it is appropriate for a single set of school food standards to be applied and for these to be clear and transparent across all phases and stages.

Overall Question

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

To a great extent	To some extent	To a limited extent	Not at all	I'm not sure
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Please explain

Section C: Practical Considerations

Implementing new standards & Compliance

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

The proposed new standards represent a significant shift in school food provision and are likely to present substantial practical challenges for schools, caterers, and kitchen staff. In particular we note, with some concern, that catering providers were asked how long they thought it would take to implement these changes. Despite responding that it would likely take three terms, schools have only been given two terms to implement widespread and wholesale change in many areas.

Kitchen infrastructure and equipment presents an immediate concern. The prohibition on deep frying and the requirement for more fresh vegetable preparation will demand equipment upgrades in many schools, particularly older primary schools where kitchen facilities have not been significantly updated in decades. It will be important that ring-fenced capital funding accompanies the new standards to address this.

Workforce capacity is perhaps the most pressing challenge. Many school kitchens rely on a small number of staff with limited formal culinary training, who are already working under significant time and budget pressures. The move towards fresher ingredients, more complex recipes incorporating pulses, wholegrains and varied vegetables, and the elimination of familiar processed convenience products will require substantial upskilling. Community would suggest that the Department instigate some form of training programme for school catering staff to develop the workforce and meet this need.

Supply chain reliability is a further concern, particularly for smaller and rural schools. Sourcing consistently available higher-fibre breads, wholegrain pasta, and British-grown pulses at competitive prices may prove difficult, and procurement frameworks will need to reflect the new requirements. This is especially an issue for breakfast clubs who are often independent of the school's main catering contractor and who may not have access to the same food preparation area and storage.

Finally, communicating changes effectively to pupils, parents, and carers, particularly those from diverse cultural backgrounds or with children with SEND, will require dedicated time and resources that are themselves scarce.

Without adequate funding, training and infrastructure support, even well-intentioned standards risk being inconsistently implemented, undermining their nutritional and welfare objectives.

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?

To a great extent	To some extent	To a limited extent	Not at all	I'm not sure
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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?

To a great extent	To some extent	To a limited extent	Not at all	I'm not sure
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37. What practical methods do you think schools could take to help ensure they meet the School Food Standards?

The School Food Standards are statutory requirements, so it is reasonable to expect all schools to follow this guidance, however, most schools are not in direct control of their meals service. Schools need to have the absolute right to require providers to meet these standards (and any subsequent revisions) as part of contract negotiations and for catering providers to be held accountable for meeting these requirements.

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

The School Food Standards are statutory requirements, so it is reasonable to expect all schools to follow this guidance, however, most schools are not in direct control of their meals service. The government needs to ensure that schools have the absolute right to require providers to meet the School Food Standards (and any subsequent revisions) as part of contract negotiations and for catering providers to be held accountable for meeting these requirements. Schools must not be held responsible for the success or failure of external catering suppliers in meeting these requirements.

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?

As already noted, it is important that all cultural and sensory needs are able to be accommodated through these new school food standards.

Environmental principles

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

Positive	Negative	Don't Know
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As already mentioned, it is important that locally produced and sourced produce is available and used in school meals. This becomes more challenging with certain pulses which are not native ingredients to the UK and will likely have to be sourced internationally which will lessen the benefits to the environment and may have a negative impact upon local supply chains and farming. It will be important to continue to support local farmers and businesses and lower food miles, as well as ensuring that school meals are healthy and nutritious.

Closing question

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