Department for Education consultation on School Food Standards: Updating the legislative framework

Submission from Feeding Britain (June 2026)

About Feeding Britain

Feeding Britain is an award-winning charity with a vision of a UK where no one goes hungry. We support a national network of 150 regional and local anti-hunger partnerships comprising more than 700 frontline organisations – ranging from community centres and schools, to local authorities and social enterprises.

By piloting innovative and effective new projects, and showing how severe or chronic food insecurity can be prevented, we are designing a road map for eliminating hunger from the communities we serve. By sharing this knowledge with others, and using it to work for systemic changes at a national level, we will ensure hunger becomes a thing of the past.

Consultation response

What practical challenges, if any, would you encounter in adhering to the new School Food Standards?

Feeding Britain is fortunate to work directly with 100 local partner organisations that deliver the Holiday Activities and Food (HAF) programme. In particular, we raise funding which enables them to create additional HAF places for families who are on a low income but fall outside the eligibility criteria. The food they serve is required to adhere to the School Food Standards. Having consulted with our HAF delivery partners, they are clear it is already difficult to meet the existing Standards, let alone the proposed updated version. Any changes that are made should recognise the practical reality that, given the limited resources with which HAF clubs operate, and in the absence of significant additional support from government and industry, full compliance with the Standards will be extremely difficult.

Funding limitations are the main obstacle to providing a menu that fully complies with the Standards. Oasis Community Hub runs a HAF club in Birmingham, whose Government funding only covers lunchtime meals: *"In addition to this we provide breakfast at our own cost. These limitations need to take this into account. If we are not funded to provide breakfast can they impose limitations on what we do provide. If the Government want to impose limitations, then they need to provide the funding alongside that."*

Daisy Inclusive UK, a Liverpool charity for disabled children that runs a HAF club, notes that healthier food is more expensive, and with HAF clubs occasionally relying on donations to deliver within budget, they can't guarantee that all donated goods will meet the Standards: *"Fresh fruit, vegetables, higher-fibre products and healthier alternatives often cost more than the foods they replace. Many providers operate within extremely limited budgets and are already facing rising staffing, transport and food costs. If Government wishes to strengthen*

nutritional standards, additional funding should be made available to ensure providers can implement the changes without reducing the quality, accessibility or quantity of provision. […] Another practical challenge is the reliance many community organisations place on donated food and local food partnerships. Providers have limited control over the specific products they receive. Consideration should therefore be given to how providers can continue to utilise donated food within the spirit of the standards without creating unnecessary barriers."

HAF providers play an important role in food provision for children with SEND, and so reasonable adjustments should be made regarding enforcing the Standards. Daisy Inclusive UK offers comment on this: *"One of the key differences between schools and HAF providers is the nature of the relationship with children and young people. Schools work with pupils every day over many years and are therefore able to gradually influence food choices, introduce new foods and support long-term behavioural change. HAF providers often work with children for only a few days or weeks during school holidays. This means opportunities to influence eating habits are much more limited and providers often need to prioritise engagement and participation in the first instance before broader nutritional improvements can be achieved. Many of the children and young people we support have SEND, including autism, learning disabilities, sensory processing difficulties and communication needs. For some children, food choices are heavily influenced by sensory preferences relating to texture, smell, appearance or taste. Many rely on a limited range of familiar "safe foods" and may experience significant anxiety when presented with unfamiliar alternatives. While improving nutritional standards is important, overly rigid implementation could result in some children eating less, refusing meals altogether or becoming distressed during mealtimes. We therefore believe providers should retain flexibility to make reasonable adjustments for children whose disability or sensory needs impact their ability to engage with certain foods."*

What practical methods do you think Government could use or introduce to help ensure HAF providers are able to meet the School Food Standards?

To support successful implementation, particularly with regard to HAF providers, we believe the Government should consider:

- Providing, or leveraging in, additional funding and/or the supply of affordable ingredients to reflect the increased costs associated with healthier menus
- Producing practical menu templates, recipes and guidance specifically designed for HAF providers
- Offering training and support on delivering the standards within SEND and neurodiverse settings
- Allowing flexibility where disability-related dietary needs, sensory difficulties or food anxiety are present
- Supporting providers to access affordable healthy food through procurement schemes or partnerships
- Introducing a phased implementation approach, particularly for smaller community organisations and charities