Position Statement
The 2026 School Food Standards Consultation

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By: The Feeding Trust (transitioning to *The Children's F.E.D. Foundation*)

Summary

We welcome the government's proposed overhaul of the School Food Standards. The reforms are the most substantial update in over a decade and set a clear direction for better-quality food in every school meal in England. For most children, they will make lunchtime healthier, more nourishing, and more equitable, and the expansion of Free School Meals to all children on Universal Credit is a public-health decision of real consequence.

For a significant minority of children, however, whether the reforms work will depend on something the consultation does not yet address: whether they can eat the food at all.

The Feeding Trust is calling for the new Standards to adopt a feeding-development focused approach that recognises eating and feeding as complex developmental processes, rather than viewing school food solely through a nutritional intake lens. A significant proportion of children experience feeding and eating difficulties that affect their ability to access, consume, or participate in school meals safely and successfully. This includes children with: developmental feeding difficulties associated with special educational needs and disabilities (SEND); paediatric feeding disorders (PFD), including avoidant/restrictive food intake disorder (ARFID); sensory-based feeding differences, oral motor and chewing difficulties; medical and gastrointestinal complexities; and neurodivergent pupils for whom the school mealtime may present sensory, emotional, social, or functional barriers before it becomes a meal.

We are asking for implementation guidance that makes the duty to provide “reasonable adjustments” meaningful in practice, supports optimal feeding development and inclusion within the school environment, and ensures that children with feeding difficulties are no longer absent from national school-food policy.

What the reforms propose

The consultation, opened on 13 April 2026 and closing on 12 June 2026, proposes the first substantive revision of the School Food Standards since 2015 (Department for Education, 2026). Deep frying in school food preparation would be banned outright. Ultra-processed and high-sugar foods will be limited. Wholegrains will be required more often, pulses mandated, and fruit juice removed from school menus. Breakfast clubs will be governed by new nutritional standards. A lead governor for food will be required in every school, with menus published online and a new compliance and enforcement framework taking effect across the 2027–28 period. The policy direction is sound, and the addition of universal Free School Meals for children on Universal Credit from September 2026 - expected to reach over half a million additional children - is welcome.

These proposals answer many legitimate concerns about the quality of food served in English schools. They do not, however, answer a question that clinicians and parents have been asking for at least a decade: what about the children who cannot eat it?

What the reforms leave out

The 2026 consultation acknowledges, at a high level, that new Standards must be flexible enough to meet the needs of children with special educational needs and disabilities, allergies, intolerances, and different cultural and religious backgrounds. That inclusion language is welcome. The current 2014/15 guidance addressed adaptive provision in a single sentence *"Schools should make reasonable adjustments for pupils with particular requirements, for example to reflect medical, dietary and cultural needs",* and the consultation proposes to strengthen it, shifting to an expectation that schools make "reasonable efforts" and adding explicit reference to SEND and sensory needs. That the proposed wording names SEND and sensory needs at all is genuine progress.

But at the level of implementation - where children and their families encounter the Standards in practice - the consultation still offers no explicit mechanism for children experiencing developmental feeding difficulties or delays including those with disorders such as paediatric feeding disorders, ARFID, or sensory eating differences. Those clinical terms, and the categories of need they describe, do not themselves appear. There is no implementation guidance, no definition of what a "medical", "dietary" or "sensory" need means in this context, no required consultation with SENCOs or clinical teams for children with clinically significant feeding differences, and no enforcement mechanism attached to the duty. This is

not a drafting oversight. It reflects a broader policy orientation that treats school food primarily as a question of quality on the plate. Our clinical experience, and the published evidence, suggests that for a significant minority of children, quality is necessary but not sufficient. A menu of high-quality foods a child cannot eat is still a menu the child cannot eat.

The current debate about the reforms is centred on an industry-pilot finding reported in the press in April 2026 - that meal uptake fell by around 15 per cent at a trial site (the school catering company The Pantry) when new standards were introduced. The caterers raising these concerns are right to do so, and the debate they have opened is one the sector needs. The 15 per cent figure, however, describes children who previously ate school meals and have stopped. It says nothing about the children who were not eating school meals in the first place, and who remain invisible in both the pilot data and the consultation.

The Evidence

Feeding difficulties are neither rare nor niche. In typically developing children, reviews have reported signs of feeding difficulties in 25-45% of typically developing children (Sdravou et al., 2021), rising to as many as 80 per cent of children with developmental disabilities (Klein et al., 2023). This high prevalence is reflected within the growing body of literature on paediatric feeding disorder following the publication of the internationally recognised diagnostic framework proposed by Goday et al. (2019), which conceptualised feeding difficulties as complex, multidimensional disorders affecting medical, nutritional, feeding skill, and psychosocial functioning. The literature is particularly striking within neurodevelopmental populations. Feeding and eating difficulties among children with autism spectrum disorder (ASD) have been reported in 50–90% of cases, encompassing sensory sensitivities, food selectivity, rigidity, anxiety, and difficulties with feeding development (Baraskewich et al., 2021; Nygren et al., 2021). These needs are not marginal in the school population. In England, around 1.7 million pupils - almost one in five - have an identified special educational need, and 483,000 hold an Education, Health and Care Plan (Department for Education, 2024/25). Autism is the single largest category of primary need among pupils with an EHC plan - around a third of all such plans - and speech, language and communication needs, which encompass the feeding and swallowing difficulties managed by speech and language therapists, are the largest category among the much larger group of pupils on SEN Support (around a quarter). Behind each of these figures are children for whom what is on the plate is only part of the question.

Our own published research contributes UK clinical-cohort evidence to this picture. Morris and colleagues (Morris et al., 2026) 100 per cent had skill-based feeding deficits which impacted their ability to learn to eat and therefore significantly compromised their nutritional intake. Within that cohort, skill-based feeding deficits - the dimension most likely to be missed by standards that focus

on the plate rather than the eater - were present in every child. It is the clearest evidence we have in the UK that feeding is a learned skill, and that when that skill has not developed in the usual way, the food on offer is not the whole of the problem.

A 2026 qualitative study of specialist schools (McSweeney et al., 2026) found that meeting individual pupils' needs within the current Standards framework is genuinely difficult, and that awareness of the Standards themselves is uneven across SEND settings. A 2025 oral-history case study of neurodivergent perspectives on the UK school meals service (Carter and Ellis, 2025) documented that the sensory and social environment of the canteen was, in their accounts, a central and often distressing part of the school-meals experience, not a backdrop to it. These are the voices the consultation has not yet heard.

Our Position

The Feeding Trust supports the direction of the 2026 School Food Standards consultation and the ambition behind it. Better standards will benefit most children. We are not proposing that those standards be diluted or delayed.
We are calling for four additions.

First, the Standards should recognise explicitly that some children live with clinically significant feeding difficulties and that school-food policy should hold that fact in view. Naming paediatric feeding disorders, ARFID, developmental and sensory-based feeding differences in the Standards and in associated statutory guidance, would signal that these children are part of the population the Standards are meant to serve.

Second, the duty to make reasonable efforts to accommodate particular requirements needs implementation guidance. A single line naming "medical, dietary and SEND" needs is not enough when the range of needs includes texture modification, preferred and/or accepted foods, sensory regulation at mealtimes, structured eating support and opportunities to develop eating skills and optimise nutritional intake. Guidance should set out what "reasonable" looks like in

practice, with worked examples and a clear role for clinicians, SENCOs, and parents and pupils in shaping school-level provision.

Third, the compliance and enforcement framework that takes effect across 2027–28 should include monitoring of adaptive provision for SEND pupils. Quality of food matters; access to food matters too. If schools are being asked to publish their menus and appoint a lead governor for food, they should also be asked to account for how pupils with feeding differences can access nutrition at school.

Fourth, the reforms should be joined up with the parallel SEND reform consultation. The School Food Standards consultation (closing 12 June 2026) and the Schools White Paper SEND reform consultation (which closed on 18 May 2026) ran in parallel this spring, and neither cross-references the other. Children who fall within the intersection of SEND and feeding differences deserve policy that recognises and responds to the full complexity of their needs that supports nutritional well-being, optimal development, and inclusion across all aspects of their schooling life.

What we are offering

The Feeding Trust (transitioning to The Children's F.E.D. Foundation) would welcome the opportunity to offer insights from its Eating as Learning Curriculum. This is an inclusive, developmentally informed approach to food education for school and college settings, currently implemented across SEND and early years provision in the UK. It explores food knowledge and eating as skills that can be developed and provides staff with a practical framework to support that development alongside the food they serve. The approach is being rolled out in community SEND settings as a resource to help implement the new Standards inclusively.

From October 2026, The Feeding Trust will transition to **The Children's F.E.D. Foundation**. Drawing on experience working in partnership with parents and schools and grounded in clinical expertise and an established evidence base, the Foundation's mission is to build national capability through education and training, advocacy and awareness, research, and a community-based digital platform for schools, families, and practitioners. This transition is designed for this policy moment: to support children who have not been fully reached by mainstream school food policy to date, and to do so in partnership with the many organisations already contributing to improvements in school food.

Engagement is welcomed with parents, teachers, SENCOs, caterers, and clinicians, as well as with members of the School Food Project coalition, whose work on implementation of the School Food Standards the Foundation supports. The Foundation invites collaboration with any organisation working in this space.

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Signed on behalf of the Trustees

The Feeding Trust
Natalie Raven Morris (Founder & CEO) and Dr Melissa Bujtor (Board Member)

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