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# **School Food Standards Compliance Pilot: Discovery Research**

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# Contents

School Food Standards Compliance Pilot: Discovery Research	1
1.0 Executive summary	3
2.0 Introduction	7
3.0 Methodology	10
3.1 Research objectives	10
3.2 Approach	10
3.3 Methodological considerations	13
4.0 Results and discussion	14
4.1 Current context	15
4.2 Devolved administration approaches to monitoring school food	23
4.3 Views of the pilot approach	25
4.4 Challenges to administering the pilot	34
5.0 Recommended pilot approach	36
6.0 Conclusion	40
7.0 Reference list	41
Appendix A: List of local authorities taking part in the pilot	43
Appendix B: Potential compliance and implementation issues	45
Appendix C: Draft questions for user testing	47

# 1.0 Executive summary

[The Requirements for School Food Regulations 2014](#) in England (known as the 'School Food Standards'), are mandatory for all maintained schools, including academies and free schools. The standards define the foods and drinks that must be provided, those which are restricted, and those that must not be provided.

The Department for Education and the Food Standards Agency recognise that schools, local authorities and caterers are working extremely hard to deliver school food, often in challenging circumstances. Department for Education's published guidance for schools and governors on the School Food Standards emphasises the importance of leadership in creating a culture and ethos of healthy eating, whilst also making clear that not all actions are a headteacher's responsibility and that these can be shared across a school with some actions best taken by cooks, external caterers, other school management staff or volunteers. The day-to-day effort already made by leaders and staff in delivering food for pupils requires important recognition. The pilot's intention is to find ways to support improvements where needed.

There is little available evidence on how schools implement the School Food Standards. To address this, the Department for Education and the Food Standards Agency with support from the Office of Health Improvement and Disparities commissioned this research to support the School Food Standards Compliance Pilot. The purpose of this pilot was to test if Food Safety Officers could carry out a School Food Standards check to identify potential non-compliance with the School Food Standards alongside food hygiene inspections. In addition, where potential non-compliance with the School Food Standards was identified, the pilot explored whether appropriate teams within local authorities would be able to support schools.

The pilot launched in September 2022 across 18 local authorities. This report focuses on the findings of the pre-pilot phase, the 'Discovery Phase', that ran from June to August 2022. The purpose of this phase was to inform the launch of the pilot in September 2022 by:

1. Investigating current food procurement and provision practices across local authorities;

2. Assessing the feasibility of Food Safety Officers completing the School Food Standards checks (herein referred to as the 'check') alongside the regular food hygiene inspections;
3. Developing questions that Food Safety Officers could use to undertake the check; and,
4. Understanding the potential ways in which local authorities might follow-up on checks to help support schools to comply with the School Food Standards.

## Methodology

Qualitative in-depth interviews were completed with 54 local authority staff (which included pilot leads, Food Safety Officers, staff with school food procurement oversight and school food intervention oversight), 5 caterers, 3 staff members at schools and 2 local government employees in Scotland and Wales with oversight of approaches to school food.

Interviews were analysed using a combination of framework, case study, and thematic analysis, to develop a draft set of questions by searching for consistent patterns of clear and observable issues for compliance with the School Food Standards. Feedback on this draft set of questions for inclusion in the School Food Standards check was also collected from 21 of these participants to refine the approach to the School Food Standards check.

## Results

Interviews with local authority participants indicated that existing approaches to assuring compliance with the School Food Standards varied widely, from developed interventions through to no oversight of school food provision. Approaches also varied across the devolved administrations of Scotland and Wales, where alternative approaches to monitoring and upholding compliance with school food policies were taken in comparison with England.

Views from local authority participants suggested that schools did not typically view the School Food Standards as a priority. They identified a trend of schools moving away from local authority provision to 'private' or 'in-house' catering, which some viewed as less

likely to be consistently compliant with the standards. Financial concerns were often raised as the primary driver of decision-making around school food provision.

Local Authority participants felt it was feasible for Food Safety Officers to conduct the School Food Standards check within certain parameters alongside the food hygiene inspections:

- The School Food Standards check should not involve observation of the lunch service
- The check should last 20 minutes at most; and would have to be unannounced.
- Food Safety Officers wanted very clear guidance and a prescribed set of questions to complete the School Food Standards check.
- Those with experience working in school food either within catering companies or schools consistently highlighted elements of the standards they felt were feasible and relevant for inclusion as questions in the School Food Standards check, in particular the provision of processed meat and pastry products; fruit and vegetables; wholegrains; and oily fish.
- Local authority participants felt that the best approach to completing the School Food Standards check would be to undertake a summary menu check of these elements, supported by engagement with school staff and observation of the kitchen area while on the school site.

In terms of following up on checks, local authority participants felt they should inform schools about the results of their check at the end of their visit, as they currently did with food hygiene inspection results. They also suggested schools be notified that their details would be passed onto relevant intervention teams within the local authority, who could then take further action. As to what further action was taken, this varied significantly and depended on the resource and expertise available within the local authorities. Some suggested they would be able to offer support to schools through menu checks or training, while others suggested they did not have the nutritional expertise or capacity to take this follow-up process on.

## **Recommended pilot approach**

A 3-step pilot approach was recommended and shared with the Department for Education and the Food Standards Agency with support from the Office of Health Improvement and Disparities for further review and consideration ahead of the School Food Standards Compliance Pilot launch in September 2022.

- **Step 1** – Inform all schools in the participating local authorities about the School Food Standards Compliance Pilot
- **Step 2** –The School Food Standards check should consist of the following elements:
  - General questions around who is responsible for School Food Standards monitoring and levels of staff training on the standards.
  - Menu check to assess provision against elements of the standards.
  - Menu check supplemented by observations on-site.
- **Step 3** – Food Safety Officers communicate results with schools and share them with appropriate teams in the local authority.

## 2.0 Introduction

A healthy and balanced diet is essential during childhood and adolescent years for optimal growth, health and development (UNICEF, 2019). Evidence suggests school food policies may improve children's total diet and dietary behaviours in school, including reduced consumption of saturated fat and increased fruit and vegetable consumption (Micha et al., 2018; Spence et al., 2013). School lunch alone contributes approximately 30% of children's dietary intake on a school day. Food provision in the school setting therefore has the potential to significantly and consistently improve the health and well-being of children (Au et al., 2018).

In England, the School Food Standards were introduced to help children develop healthy eating habits and ensure that they have the energy and nutrition they need to get the most from their whole school day. These standards are set out in [The Requirements for School Food Regulations 2014](#) and define the foods and drinks that must be provided, those which are restricted, and those that must not be provided. The School Food Standards are mandatory for all maintained schools, academies and free schools. School governing boards are responsible for ensuring the standards are met.

Currently there is little available published evidence on the extent to which schools comply with the School Food Standards or how they are generally implemented. In February 2022, the UK Government published the White Paper, '[Levelling Up the United Kingdom](#)', which stated that the Department for Education and the Food Standards Agency would jointly design and test a new approach to assuring and supporting compliance with the School Food Standards (Department for Levelling Up, Housing and Communities, 2022).

To deliver this commitment, the Department for Education and the Food Standards Agency developed the School Food Standards Compliance Pilot. The purpose of this pilot was:

1. To test if Food Safety Officers carrying out food hygiene inspections could ask questions and make observations of food preparation or service areas to identify potential instances of non-compliance with the School Food Standards. This is referred to as the School Food Standards check; and

2. Where potential instances of non-compliance with the School Food Standards were identified, appropriate teams within local authorities were able to provide support to schools to make improvements.

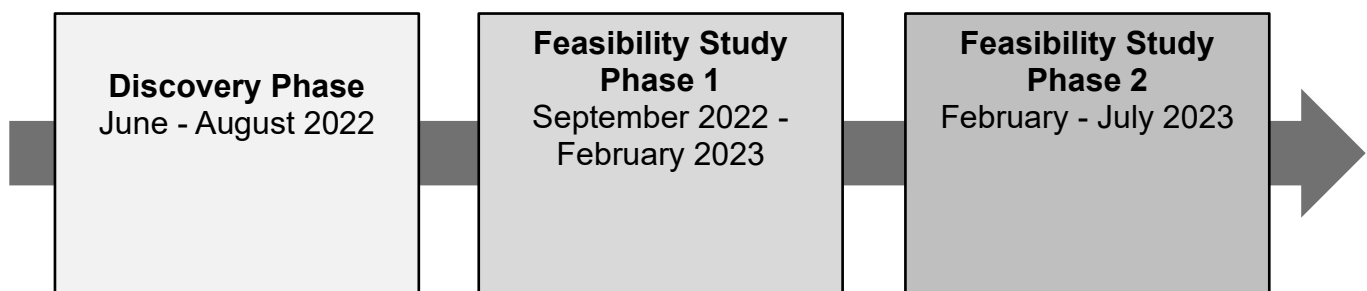
It is worth noting that the pilot did not require Food Safety Officers to check if all food provision was compliant with the School Food Standards. Instead, the School Food Standards check was completed on food provision provided by the food business operator undergoing the food hygiene inspection. This typically covered school lunch, and sometimes covered food other than lunch, such as breakfast and after school clubs.

The School Food Standards Compliance Pilot (herein referred to as the 'pilot') was launched in September 2022 among 18 local authorities who volunteered to take part (see 'Appendix A: List of local authorities taking part in the pilot'). Of these 18 local authorities, two are county councils (the upper-tier local authority). County councils do not undertake food hygiene inspections, as these take place at the district council level (the lower-tier local authority) in two-tier areas. School Food Standards checks therefore took place in 16 local authorities.

Two county councils volunteered to take part in the pilot, given their role in responding to the outcomes of the School Food Standards checks for districts within their authority where these took place.

The pilot was developed across three phases:

1. The 'Discovery Phase', followed by
2. 'Feasibility Study Phase 1', and
3. The final phase, 'Feasibility Study Phase 2' (Figure 1)



**Figure 1: Phases of the School Food Standards Compliance Pilot.**



The aim of this report is to share the findings from the Discovery Phase which ran between June and August 2022.

The purpose of this phase was to inform the launch of the pilot in September 2022 by:

1. Investigating current food procurement and provision practices across local authorities;
2. Assessing the feasibility of Food Safety Officers completing the School Food Standards checks (herein referred to as the 'check') alongside the regular food hygiene inspections;
3. Developing questions that Food Safety Officers could use to undertake the check; and,
4. Understanding the potential ways in which local authorities might follow-up on checks to help support schools to comply with the School Food Standards.

## 3.0 Methodology

### 3.1 Research objectives

The research objectives of the Discovery Phase were to:

- Explore how each of the 18 pilot local authorities procured school food and implemented the School Food Standards, including any actions taken to help support schools to comply with the School Food Standards.
- Understand the school food hygiene inspection process in primary and secondary schools and the extent to which it was feasible to complete the check by asking questions and making observations of food preparation and/or service areas to identify potential non-compliance with the School Food Standards.
- Identify common markers of non-compliance with the School Food Standards and assess the hypothetical feasibility of Food Safety Officers identifying these during their school visits.
- Develop a set of draft questions and instructions to observe food preparation or service areas in schools to support Food Safety Officers to conduct the check.
- Highlight potential stakeholders and support mechanisms within the local authority landscape that could be used to provide follow-up support to schools, where potential non-compliance with the School Food Standards is identified.

### 3.2 Approach

The Discovery Phase used a qualitative approach to meet the research objectives. In-depth interviews were completed with different stakeholders within the 18 local authority areas taking part in the pilot, including local authority staff, caterers and school representatives. Interviews were also conducted with local government employees in Scotland and Wales to provide oversight of approaches to school food in the devolved administrations to help understand the context for the pilot.

Each local authority had a designated pilot lead. Contact details for leads in each local authority were provided to Kantar Public by the Department for Education and the Food Standards Agency. Based on these initial discussions with leads, introductions were then

made with Food Safety Officers and those with responsibility for supporting schools to meet the School Food Standards in each local authority area, using a snowball sampling approach.

Schools were identified and approached about participation in the Discovery Phase research based on information drawn from the publicly available [Get Information About Schools](#) resource, which identifies eligible schools located in each local authority area. However, despite contact having been made with over 150 schools, few volunteered to take part in an interview, leading to a smaller sample size than initially intended (see Section 3.3 Methodological considerations for more detail). The Department for Education and the Food Standards Agency acknowledged that the timing of the research was likely to be problematic for schools, i.e. nearing the end of the summer term as well as the likely low awareness of the pilot which did not commence until September 2022.

The sample for caterers, and for individuals working in Scotland and Wales was also provided by the Department for Education and the Food Standards Agency to Kantar Public based on pre-existing relationships with the contacts.

## **Interviews with local authorities taking part in the pilot**

A total of 54 hour-long in-depth interviews were conducted online with a range of individuals across different roles in each local authority (described below). The term 'local authority participant' is used throughout this report to refer to those participating in these interviews:

- 16 pilot leads who were responsible for leading the roll out of the pilot on behalf of their respective local authority.
- 15 Food Safety Officers across 15 local authorities who carried out food hygiene inspections within schools as part of their role.
- 11 individuals with responsibility for supporting schools to meet the School Food Standards across 11 local authorities.
- 12 individuals across 12 local authorities with responsibility for school food procurement.

## **Interviews with other stakeholders to help understand the context for the pilot**

A total of 10 hour-long in-depth interviews were conducted with:

- 5 private catering organisations representing national and local provision.
- 2 local government employees in Scotland and Wales.
- 2 school catering managers (at a multi-academy trust and a primary school).
- 1 primary school headteacher.

## **Supplementary evidence review**

To supplement the primary research, a review of findings from the Department for Education's March 2021 evidence review on the School Food Standards research report, was conducted by an academic advisor, Dr Charlotte Evans. This report synthesises evidence on School Food Standards and other approaches to encouraging healthy eating in schools in the UK and internationally (Greatbatch & Tate, 2021).

## **Analysis**

All interviews were audio-recorded, and data was analysed using a number of methods to draw out insights: 1. Framework analysis (Gale et al., 2013); 2. Case study analysis (Crowe et al., 2011); and 3. Thematic analysis (Braun & Clarke, 2012).

Framework analysis involved transcribing the content of each interview into an Excel chart structured around the research objectives. This enabled the sorting of the data across different participant types to highlight consistencies, dissimilarities, and patterns within and between groups.

This completed framework was then used to guide the case study analysis, which involved bringing together all interviews from a single local authority to enable a comparison between the local authorities in terms of how well the School Food Standards were implemented and possible reasons for this.

Thematic analysis was also used to help identify a common set of questions that could be used in a School Food Standards check across local authorities. This involved searching for themes within the framework that suggested clear and observable issues

with the School Food Standards in schools, focusing on those that it was hypothesised that schools were more likely not to comply with. After these were identified, specific questions were devised relating to these themes for inclusion in the check, occurring alongside the existing food hygiene inspections.

In the final stage of the Discovery Phase research, the draft set of questions were tested through written and verbal feedback from Food Safety Officers and caterers who had previously taken part in the in-depth interviews. This iterative approach ensured that the questions included in the check had been optimised for effectiveness and ease of use before the pilot launched. Written feedback was collected from 14 Food Safety Officers and 5 contract caterers. Two 30-minute interviews were also conducted with Food Safety Officers. For all feedback, participants were shown the question set and asked to comment on its suitability, particularly how they felt about incorporating the questions into the check that they would complete alongside their normal food hygiene inspection routines.

### **3.3 Methodological considerations**

This research used a qualitative approach, which was essential for generating an in-depth understanding of the environments in which the pilot would be delivered across participating local authorities (e.g. operating models, ways of working, relationships between different teams). However, this research also has some limitations of which it is important to be aware.

One limitation of the research was the smaller sample size and spread of participants working in catering companies or schools. The sample for schools was intended to be broader to include a sample from a spread of different types and sizes of schools, and different roles within schools. Recruitment was challenging as the fieldwork period coincided with the busy end of term period, meaning that many schools did not have the capacity to engage in the interviews resulting in two interviews completed with catering managers and one with a headteacher. It is also likely that schools had low awareness of the pilot during this discovery phase, that might have limited research engagement.

In relation to catering services, as more individuals working in local authority catering services were interviewed than private caterers, this may have biased the findings towards a more positive view of local authority catering services.

Secondly, though the Department for Education and the Food Standards Agency did actively seek to recruit local authorities of different types and sizes across England, another limitation of this study was the self-selecting nature of the pilot itself. The 18 participating local authorities all opted into the pilot voluntarily, meaning they may already have had a higher level of engagement with school food or more resource and expertise in this area. For example, Food Safety Officers within most of the participating local authorities had some level of personal interest in nutrition. Some Food Safety Officers also had a nutritional qualification, or previous experience with interventions improving nutrition. During interviews, they often flagged that they might be exceptional cases. This will be important to keep in mind when considering their perspectives towards the School Food Standards and the resources that they have available to put towards, as these may not be representative of the wider population of local authorities.

Qualitative data is by nature non-numerical as it aims to illustrate range rather than quantity, which is important to keep in mind when interpreting these results. However, within the results section certain phrases are used to give an indication of how often a particular finding or theme was raised, to highlight the commonalities and differences encountered in participants' responses. For example, the phrases 'some', 'a few' or 'several' are used to indicate when a certain theme was raised by more than one participant but less than half of the total sample. If themes were raised by the majority of participants, the phrase 'most' is used.

## 4.0 Results and discussion

This chapter outlines findings from the research and is divided into the four main sections described below.

Section 4.1: Focuses on the findings from local authorities, caterers and schools involved in school food provision and their relationship with the School Food Standards as well as the context in which the pilot would operate.

Section 4.2: Focuses on approaches to monitoring and upholding compliance with school food policies taken in devolved administrations, to help guide the recommended approach for the pilot.

Section 4.3: Focuses on local authorities' perspectives on the feasibility of Food Safety Officers asking questions and making observations during the check to identify instances of potential non-compliance.

Section 4.4: Focuses on the challenges to the recommended pilot approach.

## 4.1 Current context

This section summarises findings from the stakeholders involved in school food provision and their relationship with the School Food Standards, focusing specifically on: local authorities, caterers and schools in that order. A detailed understanding of the context in which the pilot would operate was necessary to inform an approach with the potential to work effectively across schools and local authority areas.

### Current context - local authorities

As highlighted in Section 2.0, of the 18 local authorities who volunteered to take part in the pilot, Food Safety Officers undertook the check in 16 of the local authorities only. Interviews with these local authority participants suggested that approaches to providing and supporting school food provision varied significantly. Some had developed approaches to support individual schools with improving nutrition, such as certification schemes or nutrition training. Others either did not offer any kind of local authority school food provision or had no role that provided oversight of school food provision. The information below outlines the variance in the approaches to school food provision found across these 16 local authorities.

Some local authorities had pre-existing interventions in place that aimed to improve school food and others did not. The interventions that existed varied considerably in their aims, forms and funding models. For example, some were funded by schools paying for one-off consultancy packages to ensure their food provision meets the School Food Standards. Others were funded by grants with fixed term timescales and related to broader nutritional objectives other than the School Food Standards (such as encouraging the consumption of healthy, sustainable, and local food to reduce rates of obesity). Local authority intervention teams also operated within different organisational structures. For example, some existed only at the county council level, meaning they were responsible for a larger geographic area than just the district involved in the pilot.

Other intervention teams were not integrated with the environmental or public health teams directly involved in the pilot. For example, some sat within the local authority food provision service.

The following two case studies from Lincolnshire County Council and Peterborough City Council illustrate the variance in local authority interventions.

### **Case study 1: Lincolnshire Food Education Team**

This local authority communicates to schools about their responsibilities for meeting the standards and provides free information and advice on the School Food Standards, as well as a paid-for service for School Food Standards checking, training, menu review and action plan.

Alongside this, they run a specific School Food Standards certification scheme which involves:

- Menu and evidence checking.
- Advice on how to increase fibre and protein and reduce sugar.
- Gold level certificate for in-house school caterers, achievable by including information on food provenance, increasing fruit/vegetable servings and considering sustainability.

### **Case study 2: Food Smart Project, PECT**

Peterborough Environment City Trust (PECT) is a charity funded by Peterborough City Council's public health team, as part of a wider Healthy Schools contract, to target schools with high levels of obesity. The project supports schools on nutrition, including around:

- Food provision.
- Leadership, teaching and learning (taught lessons and lesson planning resources).
- Partnerships so schools can connect with food producers, growers, distributors, retailers and chefs.
- Self-auditing, where, if schools meet the necessary criteria they are awarded the Food Smart Accreditation, with outstanding schools having the opportunity to apply for Food Smart Ambassador Status – both include meeting the School Food Standards.



In addition to activities aimed at schools, some Food Safety Officer participants had experience of assuring other local authority level schemes involving nutrition. For example, London boroughs who had participated in a 'Healthier Catering Commitment' scheme aimed at food businesses. For this scheme, food businesses are eligible for certification if they demonstrate a commitment to reducing saturated fat, salt and sugar in their food, and making smaller portions available on request (Healthier Catering Commitment for London, 2023). Some of the interviewed Food Safety Officers were involved in checking that businesses were meeting these commitments.

## **Current context - caterers**

A number of different delivery models for catering were discussed in interviews with participants working in local authority catering services or private catering companies.

The models discussed included:

- Local authority provision, in which menus and the supply chain are developed and overseen by the local authority.
- Private contract catering, in which menus and supply chain are overseen by the contractor, sometimes with input from the schools.
- MAT catering management, in which menus are developed in individual schools and checked centrally, but supply chains are overseen by the catering manager across all schools in the trust.
- In-house catering, in which menus and supply chains are overseen by school catering staff.

## **Impact of delivery mode on compliance with the School Food Standards**

Caterers felt these different delivery models affected likely compliance with the School Food Standards. Participants viewed local authority provision as more likely to be consistently compliant, followed by contract caterers, with more variation amongst MATs (although this may be biased by the over-representation of local authority catering services in interviews in comparison to other catering delivery models). For in-house catering, views were mixed. Some participants believed that schools with in-house catering were more likely to be knowledgeable of the School Food Standards and worked harder to ensure that standards were met. Others felt that in this situation, cooks might

have less training on the School Food Standards and might lack the time to ensure that they were meeting them consistently.

"If it is a private company offering food, the schools are presuming they are offering healthy and nutritious meals that meet the standards but from our public health experience there are a lot of loopholes there which providers can potentially utilise to offer things more than they perhaps should."

**Principal public health specialist, local authority**

## Perceptions of responsibility

Some of these models were also thought to affect understanding of who was responsible for meeting the School Food Standards. Local authority staff and some caterers felt schools using either private contract catering or MAT catering were likely to see their contractor or catering manager as responsible. However, governors are responsible for schools meeting the School Food Standards regardless of catering delivery model. If a contractor or catering manager were seen to take responsibility for meeting the School Food Standards, it was felt this could also positively impact serving staff's knowledge or engagement with assuring compliance with the School Food Standards as they could be directly influenced by the contractor or catering manager.

## Cost and profit considerations

In interviews, participants working in local authority catering services reported observing a trend of schools moving away from local authority to private or in-house provision. This was seen to have created a more fragmented system of provision within many local authorities. Currently, financial concerns were seen to be the primary driver of decision-making around food for schools, and private providers were in many cases cheaper than local authority providers which may have contributed to this trend. Some participants also cited budget cuts, changes to contractual arrangements, and academisation as additional potential contributing factors to the observed trend of schools moving away from local authority provision.

In terms of how this might link to compliance with the School Food Standards, these participants thought that private providers could have a greater focus on more profitable and popular menu items, such as chips, that in some cases could be less likely to meet

the standards. While for local authority provision, some participants thought that it was perceived to be more expensive and to produce meals that were less appealing to pupils.

“I heard of a school that saved £3000 a year by using a private contractor instead of the local authority. They used this to fund a part time teaching assistant instead – which was a higher priority.”

**Head of facilities, local authority catering service**

## **Varied involvement of kitchen staff**

Beyond these models, there was also variance in whether food was cooked on or off-site, and whether kitchen staff both prepared and served or only served food. For example, in some cases, multiple schools shared kitchens, with food prepared on one site and delivered to another. Some local authority participants suggested that, in these cases, staff serving the food are likely to have limited knowledge of how it was prepared, affecting their ability to understand compliance with some elements of the School Food Standards.

## **Current context - schools**

As mentioned in Section 3.3 Methodological considerations, the sample for schools was smaller than originally intended and insights may therefore be limited. As a result, findings regarding schools and their awareness of the School Food Standards were drawn primarily from the views of local authority staff, and contract caterers with direct experience of working with schools, although the findings from the school catering manager and primary headteacher were also incorporated.

The consensus amongst local authority and private catering company participants was that most schools currently lack awareness, understanding, and consideration of their obligations regarding the School Food Standards. Schools were characterised as having many competing concerns and compliance with the School Food Standards was not felt to be a priority among these. It was also suggested that schools tended to assume that providers, regardless of whether they were a private or local authority offer, were responsible for compliance with the School Food Standards. In relation to school food, participants suggested that compliance with the School Food Standards did not drive decision-making, as financial concern was also a key factor.

"Governors are responsible but they aren't aware of this and just aren't engaged.

Decision making has changed a lot. In academy trusts, the trust decides and it almost always comes down to cost for them.

**Head of service, local authority catering service**

Given low levels of awareness and understanding, some participants also suggested that schools were unlikely to understand their full obligations. For example, some raised the view that the School Food Standards may be seen as an aspirational aim, rather than a legal obligation. Others suggested that there may be misunderstandings about the extent to which the School Food Standards apply to food provision across the whole school day, as opposed to just lunchtime provision.

Local authorities and private catering company participants also highlighted that in their experience, specific factors including school stage (primary versus secondary) and level of affluence in the area affected likelihood of compliance with the School Food Standards in a consistent way.

## Primary and secondary school distinctions

Firstly, local authority participants felt primary schools tended to be more compliant than secondary schools. Participants suggested that this was due to primary schools offering fewer choices per meal and placing a greater focus on the importance of a nutritious lunch. In addition, they suggested that parents were often more interested in monitoring and controlling the diets of primary age children, which could contribute to compliance. By contrast, they reported that secondary schools had more choices available, with less of a focus on lunchtime, and typically a larger cohort of children to feed.

Although only discussed by one participant, one food safety officer reported in their experience that many secondary school pupils would eat at break time, then skip lunch as the queues were too long and would instead go to a takeaway or convenience store after school. It was also reported that secondary schools might be more likely to take calculated risks to encourage meal uptake, as pupils tend to have more freedom to eat from off-site providers if they do not like the school's offering.

The combination of these factors was seen to result in a lower likelihood of compliance with the School Food Standards.

“We follow the School Food Standards 99.5%...we're a bit more lenient in secondary schools...but 100% in primary schools”

**Catering operations manager, Multi-Academy Trust**

## Affluence of the area

Another factor that many participants reported that in their view could affect the likelihood of awareness of and compliance with the School Food Standards was the level of affluence of an area. Several participants reported that in their experience, schools in more affluent areas had a greater focus on nutrition amongst teachers, governing bodies, and parents. Several participants also reported that children in less affluent areas may have less access to and familiarity with unprocessed fresh food outside of school. They might therefore be more likely to resist compliant food, which is generally less processed, within school.

## Supply chain issues

Service issues were also mentioned by several participants as a factor currently affecting compliance with the School Food Standards. Many participants cited major supply chain issues and food shortages present at the time of interviews. The result was that certain menu items might not have been available and weren't being served as advertised.

## **Summary of schools and local authorities understanding of the School Food Standards**

Overall, interviews with local authority and private catering company participants suggested that from their experiences there was a limited focus on the School Food Standards in schools. It was reported that even if schools were aware of the standards, they did not always understand their responsibilities for ensuring these are met, or that they apply across the whole school day. In general, schools were characterised as having many competing concerns, with financial concerns being seen as the primary driver of decision-making around food for schools.

Participants also suggested several factors that affected the likelihood of compliance with the School Food Standards, including whether the school was primary or secondary (secondary schools tended to be less compliant), level of affluence in the area (in which less affluent areas tended to be less compliant) and supply chain issues (which meant some menu items weren't available or weren't being served as advertised).

Interviews with local authority participants also revealed high levels of variation between local authorities in terms of their awareness and involvement in assuring compliance with the School Food Standards. While some had more developed approaches to support individual schools with improving nutrition, others had no specific role within the local authority that provided oversight of school food provision.

Interviews with in-house and private caterer participants suggested they typically did not view the School Food Standards as a priority or as their responsibility to ensure compliance. Participants generally viewed local authority provision as more likely to be consistently compliant, with contract caterers, MATs, and in-house models being perceived as more mixed.

## 4.2 Devolved administration approaches to monitoring school food

Other approaches to monitoring and upholding compliance with school food policies are taken in the devolved administrations, as education policy, including school food, is devolved. These alternative approaches were explored to help guide the recommended approach for the School Food Standards Compliance Pilot. Two interviews were conducted with participants in Scotland and Wales with oversight of approaches to school food in devolved administrations.

Overall, both devolved administrations run very different systems to that implemented in England.

### Approach to school food provision in Scotland

All food and drink provided in local authority or grant aided schools in Scotland must meet the standards set out in the [Nutritional Requirements for food and drink in schools \(Scotland\) Regulations 2020](#) (the 2020 Regulations). The 2020 Regulations consist of food and drink standards and nutrient standards that are accompanied by statutory guidance, [Healthy Eating in Schools Guidance](#) (2020), which supports implementation. The standards set out in the Regulations apply to any food provided or sold in schools (e.g., tuck shops, vending machines, after-school clubs etc).

Education Scotland is responsible for monitoring compliance with the 2020 Nutritional Regulations. Health and Nutrition Inspectors join a proportion of all schools inspected to monitor compliance with the Nutritional Regulations. The inspection process involves spending up to 1.5 days in a school, during which Health and Nutrition Inspectors observe food provision and service, what food is being eaten by children, what food is discarded and how the dining environment supports a positive experience for all. The process involves triangulation of evidence gathered by discussions with staff and children, analysis of documentation provided by the school and catering provider and observation of meal service and other food provision. Examples of documentation include, nutritional analysis, self-evaluation templates, surveys, data around the uptake of meals.

At the end of each inspection, a summary of findings is sent to the school and the local authority catering service. A statement is also included in the inspection report. If any issues are identified, the Health and Nutrition Inspector follows up as appropriate and offers support directly.

## **Approach to school food provision in Wales**

In Wales, local authorities provide in-house catering services to the vast majority of maintained schools. The food and drink provided must meet '[The Healthy Eating in Schools \(Nutritional Standards and Requirements\) \(Wales\) Regulations 2013](#)' which includes both nutritional standards for an average school lunch as well as food and drink requirements throughout the school day. These Regulations were made under the Healthy Eating in Schools (Wales) Measure 2009, which places duties on local authorities, school governing bodies and Estyn (the Welsh equivalent of Ofsted) in relation to a whole-school approach to healthy eating and drinking.

The Food in Schools Team at the Welsh Local Government Association advises and supports local authorities and schools to achieve and maintain compliance with the Measure and Regulations. They do so by providing nutritional analysis software, training, guidance, toolkits, briefings, and posters. To certify compliance with the Regulations per menu change, they issue 'Certificates of Compliance' to catering services who submit accurate and compliant evidence of their nutritional analyses. To reinforce this desk-based check, local authorities or governing bodies commit to undertake checks of compliance in practice and countersign the certificate. To reward and promote engagement senior officers, lead councillors, chairs of governors and partner organisations are copied into correspondence about certification. Most local authorities, as well as the largest contract caterer in Wales, were reported to engage with this certification process.

Estyn determine whether schools have made appropriate arrangements to promote healthy eating and drinking during their inspections. This is informed by noting obvious breaches to the Regulations, speaking to pupils and reviewing governing bodies' reports to parents, which must include information on the actions taken by schools to promote healthy eating and drinking. Unlike in Scotland, inspectors don't necessarily have nutritional training or expertise and the focus is on the whole-school approach to healthy



eating. The Chief Inspector of Estyn keeps Welsh Ministers informed about the actions taken at maintained schools to promote healthy eating and drinking.

In addition to being inspected by Estyn, most maintained schools are actively involved in the Welsh Network of Healthy School Schemes. This promotes a whole-school approach to health and well-being. Food and fitness is one of seven topics that schools need to demonstrate progress on to advance through the phases of the scheme and achieve a National Quality Award (NQA).

To support Estyn inspectors and NQA assessors, the Food in Schools Team have created a document outlining [‘obvious breaches, inconsistent messages and good practices relating to healthy eating in schools’](#). Certificates of Compliance are considered best practice.

## Summary of devolved administration approach

There are strengths and limitations to the approaches taken in Scotland and Wales to monitor and assure compliance with the standards schools and caterers must meet in providing school food. The approach taken by Scotland provides a rich, detailed understanding of a given school’s approach to food provision and compliance with the standards. However, it is also very time and resource intensive, relatively inflexible, requires speciality training, and probably occurs with lower frequency than school food hygiene inspections do in England.

In Wales, applying for certification of compliance is voluntary. While this voluntary approach could potentially be less resource intensive, it requires engagement from councils and schools which is not guaranteed and so may not provide an accurate overall picture of compliance.

## 4.3 Views of the pilot approach

This section summarises local authority participants’ perspectives on the feasibility of Food Safety Officers asking questions and/or making observations of food preparation, or service areas in schools alongside the regular food hygiene inspections to identify potential non-compliance with the School Food Standards in England. Participants agreed that the purpose of the check should be to identify potential non-compliance,

rather than to conduct a full assessment of a school's compliance with the School Food Standards. They felt that the strength of this approach was that it would be feasible to fit alongside the current food hygiene inspections, would place a low burden on Food Safety Officers, and would avoid the need for in-depth nutritional training and knowledge of the School Food Standards. They highlighted several considerations for the content and structure of the check and wider approach to the pilot based on their experience with food hygiene inspections and working in school food.

## **Food hygiene inspection process and implications**

Food Safety Officers outlined that a typical food hygiene inspection usually involves the following steps:

- Review a school's previous food hygiene compliance/complaints history prior to the food hygiene inspection.
- Arrive at the school unannounced (often during lunch preparation in the morning).
- Speak to the kitchen manager about their approach.
- Look through safety documents, including any safety management system information, monitoring records, food hygiene training records, and allergen management documentation.
- Ask staff about training and procedures followed.
- Conduct structural checks in kitchen (walls, floors, waste, storage etc).
- Observe staff behaviour and ask questions, referring to menus if relevant.
- Visit any other food preparation/serving areas.
- Conduct a post-inspection debrief with the kitchen manager/supervisor, to whom they will typically provide a copy of the complete food hygiene inspection report.

## **Recommendations on how to complete the School Food Standards check**

Food Safety Officer participants felt that the process of completing food hygiene inspections would have implications for the design of the pilot approach. As food hygiene inspections typically happen outside of lunch serving hours, Food Safety Officers would not be able to observe lunch service. Although they highlighted this was not feasible, Food Safety Officers with more experience of nutrition or of the School Food Standards

still felt that observation of service would be an important part of identifying potential non-compliance.

As a result, Food Safety Officers suggested that the check should focus on using menus to check if food provision does or does not comply with the School Food Standards. Food Safety Officers highlighted this was something they are comfortable doing, as reviewing menus already formed part of the typical food hygiene inspection.

In addition to this, given the unannounced nature of food hygiene inspections, it was not feasible to announce the School Food Standards check in advance. Food Safety Officer participants suggested that the scope of any questions or observations would need to be restricted to those areas of the school and to members of staff that were already involved in the food hygiene inspection process, namely the kitchen and speaking to the catering manager and any catering staff.

## **Time available to complete the School Food Standards check**

Participants also felt that the School Food Standards check would have to be conducted without impacting the quality or duration of the existing food hygiene inspections. Food Safety Officer participants typically felt that they would only have sufficient resource to spend no more than 20 minutes completing the check per school, with some suggesting they would not be able to spend any more than 10 minutes completing the checks. They felt that while this would be enough for a summary menu check and some observation of food provision or food service areas, it would not be enough time to carry out a complete menu check against the full set of School Food Standards or to look at menu recipes.

## **Capacity to complete the School Food Standards check**

At the time interviews were completed, some Food Safety Officer participants raised that they and other local authorities were still catching up with a backlog of food hygiene inspections following Covid-19 pandemic. They referenced a national [post-Covid recovery plan](#) focused on catching up on a backlog of inspections, which they felt had deprioritised schools for food hygiene inspections as they were typically lower risk than

other food businesses. Overall, they suggested that this backlog had created a lack of capacity in many local authorities that might limit engagement with the pilot.

## Key areas for the check

Food Safety Officer and local authority participants consistently suggested three key areas to cover within the checks:

1. Engagement with school staff particularly around their level of awareness of the standards: They felt that this could provide important contextual information and may help to identify the role of awareness among school staff in meeting the School Food Standards.
2. A summary menu check focusing on specific elements of the standards: As many Food Safety Officers already referred to menus as part of a regular food hygiene inspection, they felt that this would be relatively easy to include as part of the check or even carried out as part of preparatory activities prior to the check.
3. Completing observations and speaking with catering staff on-site to triangulate against a menu check: Participants suggested that speaking to staff might be necessary in instances where menus might not be sufficient to determine potential non-compliance with the School Food Standards, for example if the Food Safety Officers needed to know how a specific dish was cooked. The observations could include looking at food storage, preparation, equipment, serving areas, and vending machines.

## Content of the check

Food Safety Officer participants were supportive of the idea of collecting data relating to the School Food Standards alongside their food hygiene inspection. However, they did not want to be the final decision-maker on whether a school is compliant with the School Food Standards or to provide further support to help the school comply. As a result, they typically wanted the pilot to be guided by a prescribed set of questions, alongside very clear direction as to how to respond to these and raise any instances of potential non-compliance. They would then pass this information on to the appropriate team in their local authority, where they exist, to take any follow-up action.

Food Safety Officer and local authority participants with experience in school food consistently highlighted elements of the School Food Standards that they felt would work well in a check. They felt these elements would be indicative of a school's overall approach to food and be feasible to check alongside a food hygiene inspection. These included:

- High frequency processed meat and pastry product servings.
  - Low frequency of (or limited choice of) fruit and vegetables, wholegrain food and oily fish servings.
  - Presence of a deep fat fryer in the kitchen<sup>1</sup>
  - Whether the school has vending machines that sell sweet drinks or snack foods.

Please see 'Appendix B: Potential compliance and implementation issues' for further detail feedback provided by Food Safety Officer and local authority participants on different food groups they felt should be considered for inclusion in the check.

Some of these participants also suggested that testing awareness of the School Food Standards among kitchen staff could be a marker of compliance.

Participants also felt that it would be important to consider the number of questions and observations on food provision and food service areas in the check, to avoid the risk of schools only addressing the standards known to be a part of the check. As such, they felt that the questions used for any given check should be drawn from a longer list to avoid schools only focusing on the elements of provision checked. This was incorporated into our recommended questions for the check which can be found in Section 5.0

Recommended pilot approach.

## **User testing of questions to include in the School Food Standards check**

All interviews were analysed using a combination of framework, case study, and thematic analysis, to ultimately develop a draft set of proposed questions for the School Food Standards check. This involved searching for consistent patterns of clear and observable

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<sup>1</sup> Although participants suggested that the presence of this could indicate non-compliance, it should be noted that it is permitted within the standards to use a deep fat fryer 2 times per week

issues for compliance with the School Food Standards which would be feasible for Food Safety Officers to ask about during inspections.

A draft set of proposed questions were shown to 16 Food Safety Officer and 5 catering company participants who had previously been interviewed as part of the research (See 'Appendix C: Draft questions for user testing' for the set of draft questions). Overall, feedback on the questions was positive. It was generally believed that the questions were feasible within the current food hygiene inspection process. Most Food Safety Officer participants felt adding additional guidance and detail to the questions would be helpful to support Food Safety Officers to complete the check. Some suggested this could include detail on what to look for or any specific inclusions or exclusions for each question.

Some Food Safety Officer participants felt that the draft set of questions was too long. In response, the research team removed some of the questions before making a final recommendation to the Department for Education and the Food Standards Agency on the pilot approach. Those that were removed were questions that participants suggested were less likely to flag non-compliance. The remaining questions were consistently endorsed as relevant and feasible by local authority participants. They were also recommended by an academic advisor as markers of either the provision of nutrient dense foods or the over-provision of unhealthier foods.

In addition to this, a few Food Safety Officers did feel that this check would take longer than 20 minutes to complete but were willing to trial it to see whether this would be the case.

Many participants also highlighted that vending machines might not be the responsibility of catering staff. However, it was still included as a specific question in the recommended pilot approach to reflect the fact that it is the school's responsibility to ensure food items available from these machines meets the School Food Standards.

In terms of potential improvements to the approach, some Food Safety Officer participants felt that there needed to be scope to provide 'open-ended' answers for those that do not fit a 'yes/no' response. This suggestion was incorporated into the final recommend pilot approach, in which an 'unsure' option and a facility to provide comments were integrated into each question. In addition to this, some Food Safety Officer participants felt that pre-pilot and post-pilot communications aimed at schools should be standardised to ensure consistency. They felt that this should be the

responsibility of the Department for Education and the Food Standards Agency to ensure that all schools receive the same information.

## Communication of the pilot

Although local authority participants felt that the date of specific inspections could not be disclosed due to the unannounced nature of food hygiene inspections, they wanted the pilot to be clearly communicated to schools prior to its commencement. Communication with schools in the pilot areas in advance was seen as necessary to prompt preparatory actions, for example ensuring that menus are available, and to ensure that schools are open to the checks taking place. Although minimal prior communication with schools beforehand might help assess school's compliance 'blind', it was felt that it could risk undermining the trust and relationships between Food Safety Officers and schools.

"We have very open and transparent relationships [with schools] so I wouldn't want to jeopardise that by collecting information then not telling them about it."

**Food, health and safety enforcement manager, local authority**

Food Safety Officer and other local authority participants felt that communications around the pilot should highlight its purpose, which they felt should be framed as helping schools better meet the standards, as opposed to a stringent compliance check. They felt communications should also provide a reminder about the School Food Standards and schools' responsibilities. It was felt that this in itself would help to drive awareness of the School Food Standards and so could act as a step towards helping to drive compliance. However, Food Safety Officer and local authority participants were unclear who should be responsible for this communication and highlighted that it would be burdensome if placed on them.

"For them to understand it's trying to help, it's not an enforcement agenda, it's about us working together."

**Food, health and safety team lead, local authority**

Food Safety Officer participants also emphasised the need for clarity around who should be informed about the results of the check, and when in the process this should happen. For example, they wanted to know who at schools (e.g., governors, headteachers, head chefs) they should aim to share the results and whether this should be done on-site directly after the food hygiene inspection or later on as part of a follow up process. Most

Food Safety Officers expressed a preference for being able to communicate the results of the check onsite to align with the food hygiene inspection. They also questioned whether they should be sharing the results with caterers and other involved parties (e.g. multi-academy trust catering managers) directly.

Participants also suggested that the Department for Education and the Food Standards Agency should assist in the communication of the pilot to schools by providing templates to share the results of the check with catering and school staff. This would ensure that messaging about the pilot was consistent and that schools have appropriate contact details if they have any questions concerning the pilot.

## **Training and resources**

Food Safety Officer participants felt that it would be important to be provided with training on the School Food Standards, the aim and background of the pilot, and the actions they would need to carry out to conduct and report checks. In particular, most Food Safety Officer participants wanted detailed training on the questions to be used in the checks and guidance on how to complete observations of food provision, how to complete any forms required to record the results of the check and what to do if they were not sure if food provision did or did not comply with the School Food Standards.

Regarding the format of this training, they felt it should primarily come in the form of written guidance providing background information on the questions included in the check. If such a resource was to be made available, they would like to be able to consult it while carrying out the check. Alongside this, they felt that an introductory webinar and question and answer session led by the Department for Education and the Food Standards Agency would be helpful for clarifying any remaining questions or uncertainties.

## **Informing schools of results**

Food Safety Officer participants felt that schools should be informed about the result of checks following visits, in line with their current practices around informing schools of findings following food hygiene inspections. They suggested, that at the end of their visit, any potential instances of non-compliance should be included in their usual end of inspection report, and that this should be shared with the lead kitchen staff and also sent



to the contract caterer, if relevant. They also felt that schools should be notified that their details will be passed onto relevant intervention teams within the local authority.

Beyond this, those participants who had intervention teams within their local authority felt that they should inform schools about the result of checks following the food hygiene inspection, at which point their role would end. Some also suggested informing other organisations such as the Department for Education, the Food Standards Agency, Ofsted, or external consultants and charities involved in school food nutrition. However, as outlined in Section 4.1 Current context, not all local authorities had a food intervention team, or there were no pre-existing working relationships with them within the local authority. In these cases, these participants expressed some confusion as to whom to report non-compliant schools for further action.

## **The pilot as an intervention**

Given the suspected low levels of school awareness and variable levels of compliance with the School Food Standards, several local authority and catering company participants suggested that the pilot has the potential to act as an intervention, by driving engagement with the School Food Standards, thereby increasing understanding of the policy and helping to focus schools on compliance. They felt that the pilot could therefore help to raise standards in schools even if follow up is limited or not possible, for example due to resource constraints. In local authorities that did have intervention teams, these participants (for example from public health or county council teams) felt that the pilot was already bringing them together with Food Safety Officers and the wider environmental health team, to create closer working relationships.

## **Summary of views of the pilot approach**

Overall, all local authority participants felt that the pilot approach was feasible. They had a number of suggestions for the content and structure of the check and approach to the pilot based on their experience with food hygiene inspections and working in school food.

These primarily included:

- Focusing on menus to check food provision as the service of meals is not observed in a typical food hygiene inspection
- Limiting the scope of the check to no more than 20 minutes, requiring only the catering manager and any catering staff on-site to answer questions

- Communicating the pilot to schools in advance to prompt preparatory actions and maintain the relationships between Food Safety Officers and schools
- Providing training and resources for Food Safety Officers prior to conducting the checks

## 4.4 Challenges to administering the pilot

This section outlines a series of challenges to the recommended pilot approach.

The Department for Education publishes [checklists for school lunches and food other than lunch](#) for the School Food Standards. Food Safety Officers assumed that some questions for the check could be taken directly from these checklists. However, on reviewing the specific standards, Food Safety Officers felt some items were not appropriate for the check in the context of a food hygiene inspection given the level of detail required. An example of this is the standard for serving 'A dessert containing at least 50% fruit 2 or 3 times each week'. In this case, they felt they would not have the time nor nutritional expertise to calculate percentage of fruit content within desserts during a standard food hygiene inspection.

### Limitations of a menu-focused approach

Whilst local authority participants agreed that the pilot would need to be focused on a review of menus given the need to fit in with current food hygiene inspections, they also identified several issues with this approach. For example, it would not identify any concerns with service or food provision beyond lunch (e.g. breakfast club, after school club) as menus are usually not available for eating occasions outside the lunch setting.

### Responding to non-compliance

More generally, local authority participants also raised concerns around the number of instances of potential non-compliance that might be raised. They queried whether and how local authorities might be able to respond and whether there should be mechanisms put in place to prioritise support or whether intervention should only occur with schools with higher instances of potential non-compliance.

## Capacity concerns

Local authority participants in which there was no team or individual directly focused on interventions around school food also raised concerns, as to what they would do to address any cases of potential non-compliance, as they did not feel that they have the expertise or resource to intervene. This concern was not raised by participants from local authorities where there were such teams in place.

"We can feed in but don't have the resource and capacity to do it all and go into great levels of detail over each school menu."

**Environmental health team lead, local authority**

## Focus on food hygiene visits on a single food business operator

A limitation raised by local authority and Food Safety Officers participants was the focus of food hygiene inspection visits on a single food business operator within the school. Breakfast or after-school clubs may be delivered by a different provider to that delivering lunch service. As such, some raised that the check would be unable to cover all school food provision to ensure compliance with the School Food Standards across the whole school day.

## Summary of challenges to administering the pilot

Some participants, particularly those working in local authority intervention teams, acknowledged that the proposed pilot approach might not be the most effective. In particular, they highlighted that it could miss key issues around school food services and had not specified how potential non-compliance should be addressed. Perhaps, future phases of research could explore the relevance of these possible risks and how potential non-compliance could be addressed in more detail.

## 5.0 Recommended pilot approach

Based on the findings from the interviews, evidence from peer-reviewed literature, and input from an academic advisor, a 3 step pilot approach is recommended. This approach was developed and shared with the Department for Education and the Food Standards Agency for further review and consideration ahead of the pilot launch in September 2022.

### Step 1 – Write to schools at the beginning of the pilot to communicate the activity.

It is recommended that schools in participating local authorities are contacted at the start of the pilot, to inform them that they may be asked some questions about their compliance with the School Food Standards alongside the regular food hygiene inspections.

The primary purpose of communicating with schools will be to prompt them to do some basic preparations in advance of food hygiene inspections; and to anticipate schools' questions and to address these where possible. Clear communication about the pilot should also help to raise the profile of the School Food Standards.

The communication should clearly highlight:

- The purpose and duration of the pilot.
- That compliance with [The Requirements for School Food Regulations 2014](#) is mandatory for all maintained schools, academies and free schools.
- That schools are responsible for complying with the School Food Standards.
- That menus should be available for the check.
- That the check is separate from the regular food hygiene inspection.

Communication should be addressed to head teachers with instructions to inform kitchen staff about the checks and signpost towards further information on the School Food Standards.

## Step 2 – Check by the Food Safety Officer

It is recommended that at some point during the food hygiene inspection, Food Safety Officers conduct the check. As an initial step, this would involve asking available catering staff a series of questions to assess their general knowledge of School Food Standards. This would provide contextual understanding of cases of potential non-compliance by helping to identify whether it is driven by a lack of awareness or for other reasons. This will also ensure that a named individual is identified for any follow-up actions (Table 1).

### General School Food Standards questions

1. Named responsible person in school, whose role it is to check that school food meets the School Food Standards and address this if food and drink does not (for example, Governor, Headteacher, Head Cook, Cook Supervisor, Contractor's head office, Breakfast/Afterschool provider, other)
2. How many hours of training has each member of staff received on the School Food Standards? (Record number of hours for each individual and highlight whether there is a possible need for further training).

### Table 1: Questions to ask catering staff to assess their general knowledge of School Food Standards

Following this, to test compliance with the School Food Standards, it is recommended that Food Safety Officers conduct a menu check to assess food provided against some elements of the School Food Standards. Where possible, these menu checks should be supported with observations. Any resource designed to support Food Safety Officers to complete the check should allow recording of additional comments on ambiguities Food Safety Officers encounter when completing the check. The recommended menu-based questions broadly match the local authority participants highlighted areas of concern and are therefore the most likely to identify potential non-compliance (Table 2).

### Table 2: Summary menu check to be conducted by Food Safety Officers Summary menu check supplemented by observations

Referring to the last week's menu, or the upcoming week (whichever is easier):

1. Vegetables – minimum of 2 types offered each day? (observe quality and freshness of provision)– yes/no\*, further comments

2. Fruit – available every day and easily accessible? (observe accessibility, quality and freshness of provision) – yes/no\*, further comments
3. Dairy – a portion of milk or dairy food served at least every day? (observe accessibility of provision) – yes/no\*, further comments
4. Wholegrain/high fibre product – served at least once in the week? (observe whether there are any in stores, check fibre content on packaging) – yes/no\*, further comments
5. Processed meat products – served more than once in the week? (observe whether there are any in fridge/freezer/stores, check packaging if relevant) – yes\*/no, further comments
6. Restricted snacks – any served during the week? (observe whether there are any in fridge/freezer/ stores) – yes\*/no, further comments
7. Deep fat fryer – observe if there is one: if so, how many times a week it is used? – less than twice a week/more than twice a week\*, further comments
8. Vending machines – are there any vending machines in school that serve anything other than water? (observe presence in school dining hall selling sugary drinks/snack foods) – yes\*/no, further comments
9. Salt availability – is any salt is available for children to add to food at the table (observe presence of cellars/sachets on serving station, tables or at the till) – yes\*/no, further comments

\*the starred response indicates a flag for potential non-compliance.

For each question, include a further comments box for any observations.

### **Step 3 - Food Safety Officers communicate results with schools and share them with appropriate teams in the local authority**

It is recommended that Food Safety Officers communicate the results of the check to schools at the end of the food hygiene inspection and report any instances of potential non-compliance. When doing so, they should also inform schools that check results will be reported to a specified team in the local authority who would be in touch about follow-up activities.

## Validation of the approach

This recommended approach would benefit from validation and iteration as the pilot develops to ensure it is feasible, reliable, and valid.

Feasibility could be tested through measuring the acceptability of this approach among Food Safety Officers, schools, and local authorities. Reliability could be tested by measuring the extent to which the check questions produce the same result if a Food Safety Officer goes to the same school twice (although this may not be feasible in the short-term as Food Safety Officers only visit the same schools every couple of years on average). Validity could be tested through measuring the accuracy of the check questions at assessing adherence. Comparisons would need to be made to a separate in-depth assessment of adherence to the standards, which could potentially be conducted in a small sample of participating schools. This could involve both sensitivity testing, to test whether the check questions correctly identify schools not adhering to the standards; and specificity testing, to test whether the check questions can identify a school that is truly adhering to the standards.

## 6.0 Conclusion

The Discovery Phase was intended to provide insight into the questions and observations that Food Safety Officers could ask and make during school food hygiene inspections to identify potential non-compliance with the School Food Standards. As an output, a recommended approach was developed and shared with the Department for Education and the Food Standards Agency for further review and consideration ahead of the pilot launch in September 2022.

This approach was intended as a starting point and recommendations were made that would benefit from validation and iteration over the course of the next phases of the pilot to ensure it is feasible, reliable, and valid. The next phase of this research, Feasibility Study Phase 1, began from the launch of the pilot in September 2022. This phase of the pilot explored the experiences of Food Safety Officers completing the checks and local authorities' experiences of responding to the check.



## 7.0 Reference list

Au, L. E., Gurzo, K., Gosliner, W., Webb, K. L., Crawford, P. B., & Ritchie, L. D. (2018). Eating School Meals Daily Is Associated with Healthier Dietary Intakes: The Healthy Communities Study. *Journal of the Academy of Nutrition and Dietetics*, 118(8), 1474-1481.e1. <https://doi.org/10.1016/j.jand.2018.01.010>

Braun, V., & Clarke, V. (2012). Thematic analysis. In *APA handbook of research methods in psychology, Vol 2: Research designs: Quantitative, qualitative, neuropsychological, and biological* (pp. 57–71). American Psychological Association. <https://doi.org/10.1037/13620-004>

Crowe, S., Cresswell, K., Robertson, A., Huby, G., Avery, A., & Sheikh, A. (2011). The case study approach. *BMC Medical Research Methodology*, 11(1), 100. <https://doi.org/10.1186/1471-2288-11-100>

Department for Education. (2023). *Get Information about Schools—GOV.UK*. <https://get-information-schools.service.gov.uk/>

Department for Education. (2023). *School food standards: Resources for schools*. GOV.UK. <https://www.gov.uk/government/publications/school-food-standards-resources-for-schools>

Department for Education (2014). *The Requirements for School Food Regulations 2014*. [online] GOV.UK. [The Requirements for School Food Regulations 2014](https://www.gov.uk/government/publications/the-requirements-for-school-food-regulations-2014)

Department for Levelling Up, Housing and Communities. (2022). *Levelling Up the United Kingdom*. <https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>

Food Standards Agency. (2021). *Local Authority Recovery Roadmap*. <https://www.food.gov.uk/sites/default/files/media/document/fsa-21-05-02-local-authority-recovery.pdf>

Gale, N. K., Heath, G., Cameron, E., Rashid, S., & Redwood, S. (2013). Using the framework method for the analysis of qualitative data in multi-disciplinary health research. *BMC Medical Research Methodology*, 13(1), 117. <https://doi.org/10.1186/1471-2288-13-117>

Greatbatch, P. D., & Tate, S. (2021). Evidence review on the school food standards. *Department for Education*.

Healthier Catering Commitment for London. (2023). *Healthier Catering Commitment For London | Reducing Fat, Salt & Sugar*. Healthier Catering Commitment.  
<https://healthiercateringcommitment.co.uk/>

Micha, R., Karageorgou, D., Bakogianni, I., Trichia, E., Whitsel, L. P., Story, M., Peñalvo, J. L., & Mozaffarian, D. (2018). Effectiveness of school food environment policies on children's dietary behaviors: A systematic review and meta-analysis. *PloS One*, 13(3), e0194555. <https://doi.org/10.1371/journal.pone.0194555>

Scottish Government (2020). *The Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2020*. [online] GOV.UK. [The Nutritional Requirements for Food and Drink in Schools \(Scotland\) regulations 2020](#)

Spence, S., Delve, J., Stamp, E., Matthews, J. N. S., White, M., & Adamson, A. J. (2013). The Impact of Food and Nutrient-Based Standards on Primary School Children's Lunch and Total Dietary Intake: A Natural Experimental Evaluation of Government Policy in England. *PLoS ONE*, 8(10), e78298. <https://doi.org/10.1371/journal.pone.0078298>.

Welsh Government (2013). *The Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations 2013*. [online] GOV.UK. '[The Healthy Eating in Schools \(Nutritional Standards and Requirements\) \(Welsh\) Regulations 2013](#).

UNICEF. (2019). *The State of the World's Children 2019: Children, food and nutrition*. UNICEF.

# Appendix A: List of local authorities taking part in the pilot

The authorities selected to participate in the pilot are:

Blackpool Council

Lincolnshire County Council\*

City of Lincoln Council

Plymouth City Council

Nottingham City Council

Royal Borough of Greenwich

Derbyshire County Council\*

Derbyshire Dales District Council

City of Wolverhampton Council

Oldham Council

Herefordshire Council

City of Bradford Metropolitan District Council

Telford and Wrekin Council

Newham Council

Chelmsford City Council

South Tyneside Council

Peterborough City Council

Tonbridge and Malling Borough Council

\* Lincoln City and Derbyshire Dales are the only district councils within Lincolnshire County Council and Derbyshire County Council whose Food Safety Officers will be participating in the pilot.

## Appendix B: Potential compliance and implementation issues

The following table lists potential areas that, based on their experience, local authority participants felt could be aspects of the school food standards that schools are not currently complying with. For each of these, the table also details what they suggested might be potential issues in checking these aspects of the standards as part of a School Food Standards check.

Food Group	Reported Compliance Issues	Issues for Implementation
<b>Starchy foods</b>	Local authority participants perceived a general lack of wholegrain foods being provided by schools and the provision of too much starchy food cooked in oil.	Some caterers may not realise that starchy food cooked in oil relates to pancakes and doughnuts as well as chips (and so may not raise this when asked a direct question about this standard).
<b>Fruit &amp; vegetables</b>	Local authority participants reported that cost is likely to be a recurrent issue around fruit and vegetables for schools (and that one way to get round this is to provide a small amount so that the School Food Standards are met but this means that fruit and vegetables may not be widely available for all pupils). Additionally, fruit and vegetables may not be presented in the most appealing way and/or consumption may not be actively encouraged.	May be difficult to check recipes (e.g., 50% fruit desserts). May be quite reasonably changed at short notice due to shortages/low availability of items.
<b>Protein sources</b>	The cost of meat and fish was repeatedly raised as a reason that schools may be providing more processed meat and fish products,	May be difficult to check the quality of processed meat and fish products.

Food Group	Reported Compliance Issues	Issues for Implementation
	or limited fish, on their menus. Some local authority participants also felt that not enough non-dairy vegetarian protein is being provided on menus	
<b>Milk and dairy</b>	Generally not enough dairy foods available, especially in secondary schools	
<b>Foods high in fat, sugar and salt</b>	Local authority participants had a suspicion that break time foods provided may be high in fat, salt and sugar. Several of them felt that the sales of these food appealed more to children and might be more profitable. Caterers might also allow some elements of confectionery in puddings to increase appeal (e.g., chocolate/chocolate chips).	May be difficult to check break time food provision (given this is not likely to be on a menu and it would be inconvenient for Food Safety Officers to visit during break service time). May be difficult to check the ingredients of puddings (i.e., whether they contain confectionery or not).
<b>Drinks</b>	Local authority participants suggested there was a general confusion around drinks and what is permitted (are drinks with sweeteners permitted, does this include fruit-flavoured waters). Confusion about what is allowed in vending machines (given that caterers generally do not have control over these)	May be difficult to ascertain what drinks are available throughout the school and their contents (vending machines may be far from the dining hall)

**Table 3: School Food Standards compliance and pilot implementation issues raised by Food Safety Officer and local authority participants**

# Appendix C: Draft questions for user testing

Food Safety Officers could ask kitchen staff:

- Whether they are aware of the School Food Standards.
- How much training they have had on the School Food Standards.
- Who is responsible for ensuring that their school's food meets the standards.

Food Safety Officers will conduct a simple menu check, focusing on the last week's menu (up to and including the day of the visit; or last week's menu plus the day of the inspection if that is simpler) and discuss with catering staff:

- Whether the food was served as described on the menu on these days (and if not, why this was, what substitutions were made).
- Key elements of the standards, such as whether the following were served (focusing on what was served to children, if this was different from what was stated on the menu)
  - Three or more different low fat starchy foods (such as potatoes, pasta, rice) each week
  - One or more wholegrain varieties of starchy food (such as wholemeal bread) each week
  - Starchy food cooked in fat or oil (such as chips) no more than 2 days each week
  - One or more portions of vegetables or salad as an accompaniment every day
  - One or more portions of fruit every day
  - At least 3 different fruits, and 3 different vegetables each week
  - Oily fish once or more every 3 weeks (if not on the week in question's menu, when it is next on the menu)
  - A meat or poultry product (manufactured or homemade and meeting the legal requirements) no more than once a week in primary schools and twice each week in secondary schools (applies across the whole school day)

- 2 or fewer portions of food which include pastry each week (such as sausage rolls, pie or quiche)
- No confectionery, chocolate and chocolate coated products served in school

Note: an answer of 'no' for any of the questions raises an instance of non-compliance

- How many vending machines do you have in school which provide any snacks or drinks other than water?

Note: vending machines selling confectionery, sugary drinks or salty savoury snacks (such as crisps) raise an instance of non-compliance

Observations made by Food Safety Officers and follow-up questions:

- Kitchen equipment used (where a deep fat fryer is seen, asking how often this is used on average per week flag)

Note: an answer of more than twice a week raises a potential instance of non-compliance

- Products in fridges/stores (if there appear to be many pre-packaged goods, particularly processed meat, pastry products and/or sugary drinks or snacks, discuss with staff how they serve these foods)

Note: if their answer does not appear to be aligned with the menu, this raises potential instance of non-compliance

- Preparation area (are staff preparing a meal as described on that day's menu, if not discuss the reasons why and check this means that the menu still meets the School Food Standards)
- Observe service area (e.g., is there a salad bar if it is suggested in the menu, does the service area seem large enough to serve the items displayed on the menu including vegetables)

Note: obvious disparities between the menu and service area raises potential instance of non-compliance

- Observe presence of vending machines in or around dining area(s)

Note: the presence of vending machines selling confectionery, sugary drinks or salty savoury snacks (such as crisps) raises potential instance of non-compliance



At the end of the check, Food Safety Officers would then state any issues that demonstrate that the school is not meeting the School Food Standards and that the relevant team in the local authority that supports food interventions will be in touch to discuss further actions.



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