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

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# 1.0 Executive summary

[The Requirements for School Food Regulations 2014](#) in England (known as the 'School Food 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 head teacher'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 developed 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 second phase of the pilot known as 'Feasibility Study Phase 1'. The objectives of this research were:

1. To test the pilot's design in the field.
2. To explore the feasibility of Food Safety Officers undertaking checks of school food against the School Food Standards. This was to identify issues with a longlist

of specific questions and to assess training and guidance provided for Food Safety Officers.

3. To understand the experiences of Food Safety Officers completing the School Food Standards check (herein referred to as the 'check').

To understand local authorities' experience of responding to the results of the check.

## Methodology

A mixed method approach was used. Food Safety Officers who had completed at least 1 School Food Standards check completed an online survey to determine how they had prepared for the checks and whether they had any difficulties conducting them. In-depth interviews were conducted with 32 local authority staff, including 18 Food Safety Officers and 14 local authority staff with school food intervention oversight.

## Results

Food Safety Officers were generally positive about administering the School Food Standards check and felt it did not significantly impact upon their food hygiene inspection activities. However, they raised a number of concerns that impacted on their ability to conduct the School Food Standards checks, most notably about kitchen staff being effectively prepared and able to answer questions and providing more helpful guidance on particular checks.:

Following the School Food Standards checks, most Food Safety Officers reported the results of the check to school staff. All Food Safety Officers shared the results with local authority environmental health teams, and often with public health teams. Where there was a county council with specific expertise around school food, the check results were shared with them.

All local authorities had informed schools of their check results or were planning to do so. However, at the time of conducting the research, many local authorities' approaches to reviewing and responding to checks were still being determined, and there was a limited response back from schools. Some local authorities reported that they were waiting for additional guidance from the Department for Education and the Food Standards Agency to inform their approach.

Following the checks, potential responses available to local authorities varied depending on availability of resources and expertise. Local authorities with environmental health teams felt limited to informing schools about their check results. Those with public health teams, who typically had nutrition expertise, felt they could make more specific suggestions for actions schools could take.

In some cases, local authority catering services serving schools that had undergone the School Food Standards check were able to respond directly to feedback by making menu changes. In other cases, local authorities with specialised school food traded services, often sitting at the county council level, had comprehensive services to tackle potential non-compliance. They highlighted that engagement from potentially non-compliant schools and caterers would be a prerequisite to implementation of such responses.

## Recommendations

Recommendations to improve the School Food Standards check include revisiting the check questions to address Food Safety Officers' concerns, standardising the check approach across different food services throughout the day, and providing a clear rationale for Food Safety Officer involvement to support engagement. To optimise the response at a local authority level, key recommendations include more central support from the Department for Education and the Food Standards Agency in terms of guidance or the sharing best practice across local authorities.

## 2.0 Introduction

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. [The Requirements for School Food Regulations 2014](#) define the foods and drinks that must be provided, those which are restricted, and those that must not be provided. They regulate the food and drink provided at both lunchtime and at other times of the school day, including, breakfast clubs, tuck shops, mid-morning break, vending and after school clubs. The School Food Standards are mandatory for all maintained schools, academies and free schools with school governing boards 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 develop a new approach to assessing and supporting compliance with the School Food Standards.

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

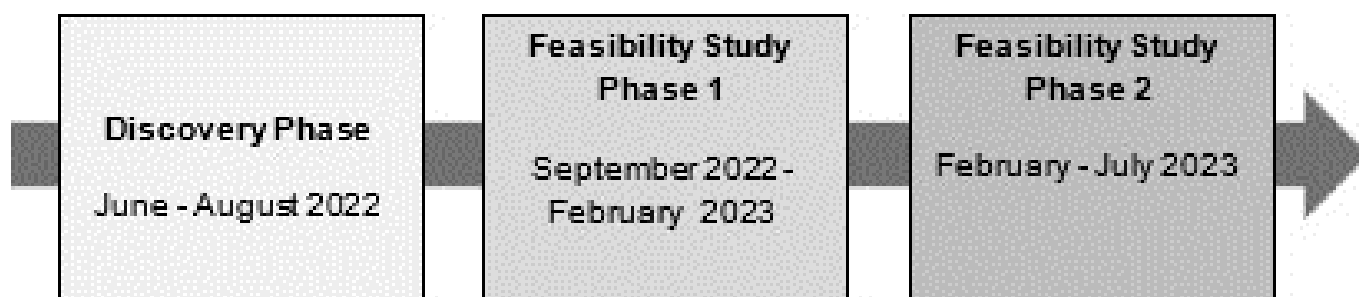
operator undergoing the food hygiene inspection. This typically covered school lunch, and sometimes covered food other than lunch, such as breakfast and after school clubs.

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 (Appendix A). 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. The School Food Standards check 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 check for districts within their authority where these took place.

The pilot was developed across several phases (Figure 1):

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



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

The aim of the Discovery Phase (June – August 2022) 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.

The aim of this research report is to present the findings of phase 1 of the Feasibility Phase (September 2022 – February 2023). The objectives of this research were:

1. To test the pilot's design in the field.
2. To explore the feasibility of Food Safety Officers undertaking checks of school food against the School Food Standards. This was to identify issues with a longlist of specific questions and to assess training and guidance provided for Food Safety Officers.
3. To understand the experiences of Food Safety Officers completing the School Food Standards check (herein referred to as the 'check').
4. To understand local authorities' experience of responding to the results of the check.

This evidence was used to inform the design of the final phase of the pilot, Feasibility Study Phase 2. A future report will present the findings from that phase, which will test the feasibility of an updated pilot design. Phase 2 will also seek to gather insights on local authorities' responses to the checks of schools within their area, as well as exploring any change in school food provision by schools and caterers resulting from the check and/or these local authority responses.

## 2.1 Pilot Approach

Evidence collected from the Discovery Phase was used to develop the pilot approach in Feasibility Study Phase 1. A summary of this approach is outlined below:

1. The School Food Standards check took place in 16 local authorities in schools where the School Food Standards apply that were due a food hygiene inspection.
2. The 16 local authorities taking part in the pilot were divided equally to either group A or group B. Each group was allocated a different set of 6 questions which Food



Safety Officers used to complete the School Food Standards check (Appendix A: List of local authorities that took part in the pilot).

3. An 'aide memoire' (Appendix B: memoire) was developed to help Food Safety Officers to record the results of the School Food Standards check. This form also contained information to support Food Safety Officers to complete the check.
4. Food Safety Officers were instructed to only complete the School Food Standards check on the specific food provision provided by the food business operator. For example, if the food business operator was responsible for providing the breakfast and lunch, Food Safety Officers were asked to only complete checks on these provisions.
5. If the food business operator was responsible for providing more than one provision, Food Safety Officers were also instructed to complete separate checks on each provision. In practice this meant that Food Safety Officers were asked to complete a separate copy of the aide memoire for each provision they completed the check on.
6. After completing the aide memoire, Food Safety Officers were asked to use the information recorded in this form to complete the 'School Food Standards check online' form to be submitted to the Department for Education. It was also used by the research team for internal analysis.
7. Food Safety Officers were asked to disseminate the completed aide memoire to the team within their local authority responsible for providing support to schools.
8. Where potential non-compliance with the School Food Standards was identified, appropriate teams within local authorities were asked to provide support to schools.

## 3.0 Methodology

### 3.1 Research objectives

The research objectives of Feasibility Study Phase 1 were to:

- Explore the experiences of Food Safety Officers completing the check including any difficulties they encountered.
- Understand Food Safety Officers' perceptions of the validity of the check and the data they collected.
- Identify how local authorities received and responded to data from the check.
- Outline the range of responses to the check that are available to local authorities and how these responses are perceived in terms of appropriateness and feasibility.
- Through Food Safety Officers experiences of completing the checks and local authority teams experiences of responding to the checks, understand how schools and caterers responded to the check.

### 3.2 Approach

This research triangulated qualitative data (from interviews) with findings from the experience survey to draw on the relative strengths of each approach in interpreting data. While qualitative methods provide a rich understanding of individual experiences, the experience survey allowed for the quantification of experiences across the sample and in different local authorities. Due to the difference in research methods, the findings are presented differently, as findings from the survey are quantified numerically and presented in the format of (x/y) participants.

### School Food Standards Experience Survey

Food Safety Officers who had completed at least one check between September and December 2022 were asked to complete a 10-minute online survey (referred to as the 'experience survey') to understand their experiences of completing and reporting the results of the check. The survey link was emailed directly to Food Safety Officers and

asked questions about how they had prepared for the check and whether they had any difficulties conducting them (Appendix D: Experience Survey). 32 out of 35 Food Safety Officers across 15 local authorities responded to the survey, 11 of whom were allocated to group A and 21 of whom were allocated to group B. All survey responses were completed in October and November 2022, with findings used to inform the development of topic guides for qualitative in-depth interviews.

## In-depth interviews

32 staff, covering a range of roles across the 16 local authorities that had completed checks at the time of the research, participated in qualitative online in-depth interviews, each lasting one hour and taking place from December 2022 to January 2023.

Participants were recruited from amongst those who had taken part in the Discovery Phase or had completed the experience survey and opted in to the invitation for a follow-up contact.

In total, the following participants were interviewed:

- 18 Food Safety Officers who completed a check in at least one school. Interviews were conducted with Food Safety Officers across all 16 local authorities where checks were undertaken by the Food Safety Officers. The interviews were evenly distributed between Food Safety Officers whose authority was allocated to group A or group B.
- 14 local authority leads across 14 local authorities who were overseeing the receipt of check results and taking responsibility for the follow-up support provided to schools after the check (two local authorities declined to participate due to a lack of resources). There was considerable variance in who participated in the in-depth interviews in terms of their role, responsibilities, and involvement in the pilot (see the Discovery Phase report for details of the local authority context).

The sample included individuals drawn from all of the following teams and roles, 6 of whom were allocated to group A and 8 to group B:

- Environmental health, including Food Safety Officers and team managers.
- Public health, including senior managers, specialists or consultants, and nutritionists.
- Catering services, including catering services managers and food development officers.

- Traded services, including school food managers, business development leads, and members of the food education team.

### 3.3 The School Food Standards check

Following the Discovery Phase research, the Department for Education and the Food Standards Agency agreed a final set of questions to be included in the check. Feedback was also sought from an external advisory board made up of school food charitable organisations, nutritionists, caterers, school cooks, head teachers and academics to ensure that the checks taken forward were considered to be the most useful and feasible in identifying potential non-compliance with the School Food Standards. Considerations included aligning as far as possible with the legal wording of [The Requirements for School Food Regulations 2014](#) and what was feasible for Food Safety Officers to implement during food hygiene inspections.

The check comprised a longlist of 12 questions covering different aspects of the School Food Standards. To reduce the time burden on Food Safety Officers who would be completing the checks, the 16 local authorities were divided into two groups (A and B) (Appendix A: List of local authorities that took part in the pilot), which were each allocated a different set of 6 questions. The 2 groups were balanced to include a range of authority types, regions of England, and total number of eligible schools.

The final set of 12 questions that constituted the check were as follows:

#### Group A

1. Are snacks other than nuts, seeds, vegetables and fruit available?
2. Are more than 2 portions of food which include pastry provided each week?
3. Is starchy food cooked in fat or oil provided on more than 2 days each week?
4. Is oily fish provided at least once every three weeks at lunch?
5. Are cakes, biscuits or desserts available outside of lunch?
6. Is free fresh drinking water available at all times?

#### Group B

1. Are one or more portions of fruit and one or more portions of vegetables provided every day at lunch? [If checking service outside of lunch: Is either fruit or vegetables or both available every day this week?]

2. Is a meat or poultry product provided more often than permitted?
3. Are confectionery, chocolate and chocolate coated products available?
4. Are more than 2 portions of food that has been deep-fried, batter-coated or breadcrumb-coated provided each week?
5. Is a portion of wholegrain starchy food provided at least once in the week at lunch?
6. Are non-permitted drinks available?

As was recommended in the Discovery Phase, a standardised letter was sent to all eligible schools in participating local authorities to inform them about the pilot (Appendix E: Copy of letter sent to schools).

For the check, Food Safety Officers were advised to complete the following steps:

1. Explain the purpose of the pilot and check to school staff.
2. Complete the check by filling in the aide memoire (Appendix B: Aide Memoire) according to the group their local authority was assigned. For each question, Food Safety Officers could answer 'yes', 'no', 'unsure', or 'not checked' as a response. Food Safety Officers were instructed to select 'unsure' if they found it difficult to determine if there was evidence of potential non-compliance with the standard. Food Safety Officers were asked to select 'not checked' if they were not able to complete the check for reasons other than finding it difficult to determine if there was evidence of potential non-compliance with the standard.
3. Complete a separate check for each type of food provision for which the food business operator is responsible.
4. Provide feedback to the food business operator at the end of the check as to whether any potential instances of non-compliance with the School Food Standards was identified and inform them that the findings would be shared with relevant teams within the local authority.
5. Send the completed aide memoire to the team within their local authority that is responsible for providing support to schools.
6. Complete the School Food Standards check online form and return to the Department for Education.

## 3.4 Methodological considerations

There are some caveats to the research to be aware of. Firstly, the 18 participating local authorities all opted into the pilot voluntarily, raising the possibility that they may already have had a higher level of engagement with school food and potentially more resource and expertise in this area than other local authorities across England. Secondly this research was conducted shortly after the launch of the pilot in September 2022. This is evidenced by the fact that most participants who completed the experience survey, from October 2022, had completed less than 3 checks at the time of their response. Hence findings are limited to the early stages of the first phase of the pilot. Further research will be undertaken after the completion of the second phase of the pilot, which will provide further insights.

## 4.0 Results and discussion

This chapter outlines findings from the research and is divided into five main sections (described below), which broadly follow the chronological structure of the School Food Standards Compliance Pilot approach.

Section 4.1: Focuses on Food Safety Officers' experiences of administering the checks and outlines their overall attitudes towards the pilot, from training through to implementation.

Section 4.2: Focuses on the check itself, highlighting challenges Food Safety Officers raised around specific questions included in the check, and how these could impact the reliability of the checks in terms of detecting potential non-compliance.

Section 4.3: Focuses on the distribution of the check outcomes by Food Safety Officers, a review of the check results and the processes by which the check results were processed by local authorities and other stakeholders.

Section 4.4: Focuses on local authorities' responses to the checks.

Section 4.5: Focuses on a range of potential responses proposed by local authorities for future cases of non-compliance.

### 4.1 Administering the checks

#### General sentiment about the pilot

Overall, in interviews most Food Safety Officers were positive about the checks and reported finding the process of visiting schools, conducting checks and reporting on checks to be relatively smooth. It is notable here that many Food Safety Officers interviewed were strongly engaged with the pilot and had either volunteered due to a personal interest or been selected by the local authority lead due to their experience with nutrition. Some Food Safety Officers were more neutral, as they felt they were yet to see any positive benefits of the pilot activity, but nonetheless claimed to be happy to continue completing the checks following the pilot.

There was one case in which a Food Safety Officer who had not volunteered to take part expressed more negative sentiment towards the checks. She/he felt that the check and follow-up paperwork took too much time to administer and prevented her/him from executing the core duties of enforcement. In addition, the checks conducted had not raised any potential non-compliance so far, hence the benefit as of the check was unclear.

“No I don’t want to do this permanently – we have enough to do. It really takes time away from my main remit which is enforcement, from what I'm trained to do and what I'm good at doing....”

**Food Safety Officer**

## Information on next steps

When interviews were conducted, most Food Safety Officers were still completing their first few checks and wanted more information on whether and how the pilot would continue to be rolled out. Information desired included the ways in which follow-up actions would be taken by the schools and the extent to which the Department for Education and the Food Standards Agency would be able to help implement this. They felt that having this would provide a stronger rationale for the investment required from them and help maintain their engagement in the process.

“What are we aiming to get from this project? Is it just going to be a process that is carried out and then it's not going to have any impact? I would like to see some impact from this.”

**Food Safety Officer**

## Training and support

Findings from both the in-depth interviews and the experience survey showed Food Safety Officers raising no issues with the preparatory training and support provided by the Department for Education and the Food Standards Agency. The majority of Food Safety Officers who took part in the experience survey (27/32) either agreed or strongly agreed that they had enough understanding of the check. Food Safety Officers spent



around two hours on average preparing for the checks. This typically involved attending online briefings (29/32), reading the written guidance (27/32), and proactively conducting self-guided learning such as researching the School Food Standards (20/32). 12/32 Food Safety Officers also sought additional guidance from others within their local authority to help them understand or interpret the check, and 10/32 reported receiving local authority specific training.

## Varied approaches to carrying out the check

Local authorities took different approaches to staffing and reporting the check, however, they can be summarised as either a 'focused' or 'spread' approach, each of which are outlined below:

### **Focused approach**

This approach was taken by the majority of local authorities participating in the pilot. In this approach, there were typically one or two Food Safety Officers that were specifically responsible for completing the School Food Standards checks.

Food Safety Officers using this approach had typically volunteered for participation and/or had nutrition experience. They tended to be more engaged with the process and expressed more positive sentiment. However, as there were fewer Food Safety Officers participating in the checks, this approach meant that those involved took on a larger workload in relation to the pilot.

### **Spread approach**

This approach was less common amongst local authorities participating in the pilot. Under this approach, the checks were distributed evenly across all Food Safety Officers in the local authority (typically around four to five).

The reasons cited for taking this approach were that it enabled all Food Safety Officers to have experience of conducting the check to add to their skillset, whilst preventing the additional workload from falling on just one or two individuals.

One Food Safety Officer in a local authority utilising this approach felt that a focused approach would be preferable, as it would enable the chosen Food Safety Officer(s) to become specialised in nutrition and work more efficiently. They also suggested that these specialists could then take on more responsibility for following-up with schools.

## **Food Safety Officers experience of completing the checks**

Based on survey results, the mean number of checks completed by Food Safety Officers was 3.2 and the mode was 2, with a range of 2 to 20 across the participating local authorities. In interviews, several Food Safety Officers reported that they had moved schools up in the regular food hygiene inspection schedule for this purpose. Therefore, the number of checks completed may be higher than compared to business as usual.

## **Ease of carrying out the checks**

In interviews, some Food Safety Officers reported that they were initially nervous about conducting the check due to its unfamiliarity but found that it became easier and quicker to do as they completed more. This was especially the case when visiting schools served by a caterer that they had previously checked whilst inspecting another school. As they already knew where potential non-compliance might be as menus were often the same, the Food Safety Officers could complete the checks in a quicker time frame.

## **Impact of completing the check on the food hygiene inspection process**

In findings from the qualitative interviews, most Food Safety Officer felt the checks did not significantly impact on their main food hygiene inspection. In general, they reported it took them an extra 10 to 20 minutes on-site to complete the check, and 30 to 45 minutes off-site to complete the School Food Standards Check Online Form.

A minority of Food Safety Officers interviewed reported checks taking up to an hour in larger secondary schools or when checking more than one food provision. Conversely findings from the experience survey demonstrated that just under half of Food Safety

Officers reported the length of the check to be a medium problem (8/32) or a small problem (7/32), with the rest reporting it not to be a problem (17/32).

## Engaging with catering staff

In interviews, several Food Safety Officers raised issues when completing the check due to lack of knowledge by catering staff on certain questions included in the check.

Although staff tended to have knowledge of their specific work areas in the kitchen, some were not aware of the School Food Standards. This finding was also found in the experience survey, as almost half (15/32) of Food Safety Officers reported ‘Staff knowledge to support the check’ as a problem for at least one of the checks they conducted.

“I think their lack of knowledge of the School Food Standards could make it difficult for them to recognise non-compliance or to understand what might be a reasonable flex [flexibility] from planned menus, like for switching carbs or proteins or cooking methods”

**Catering manager, local authority**

## Varied approaches to completing checks

In the guidance provided to Food Safety Officers before the pilot, they were asked to only complete the check on the food provision provided by the food business operator with whom they were completing the food hygiene inspection. However, several Food Safety Officers reported in interviews that it was not clear whether they should be checking different food services throughout the day, or multiple food provisions even when they were provided by different food business operators in schools and, if so, then how to do so.

It appeared that there was no standardised approach for which provisions Food Safety Officers completed the check for at each school. Which provisions were checked varied among Food Safety Officers within the same authority and across authorities.

Approaches to completing the checks depended on: what Food Safety Officers thought was included in the School Food Standards (for example some thought the break time offer was not included); whether the provisions were offered by the same food business operator (as often breakfast and after school clubs were run by separate operators); and

whether someone responsible for the provisions was available and on-site during the inspection.

The most common approach taken by Food Safety Officers was looking at lunchtime provision alone. In secondary schools, most Food Safety Officers would also look at break time provision when it was provided by the same food business operator that served lunch. However, there were also some cases in which Food Safety Officers reported not checking break time provision as they (mistakenly) believed that it didn't fall under the School Food Standards.

A minority of Food Safety Officers took a different approach and checked all food provisions at the school, including breakfast and after school clubs in addition to the lunchtime and breaktime offer.

However, checking all provision was not common, in part because breakfast and after school provisions were harder to check. This was in part due to timing, with visits more likely to take place during the day. In addition to this, in most cases the food business operator providing lunch was not responsible for the morning and after school club provision. Food Safety Officers understood that these provisions were not included as part of their inspection. Beyond this, there were also often no staff on-site with knowledge of these provisions to ask the check questions. In such cases, Food Safety Officers would have had to follow up off-site to complete the check of these provisions, which was outside the scope of the pilot.

## **School and caterer response to the check**

No Food Safety Officers reported schools resisting or declining the checks in either the survey or interviews. However, they did report that some school staff asked questions or raised concerns about what the outcome of the check would mean.

There appeared to be varying levels of awareness of the checks among headteachers, receptionists, and catering staff at schools across local authorities. In most local authorities, interviewed Food Safety Officers reported headteachers or receptionists were aware that the checks were happening, based on the letter sent by the Department for Education to all eligible schools in the pilot areas (Appendix E: Copy of letter sent to schools). However, headteachers were not typically engaged or concerned about the

check. A few had reached out to contacts in the local authority to confirm the validity of the letter.

In one local authority, the pilot had been publicised with a press release and the result of this was that schools in the area were more engaged with the process. For example, in one school the headteacher accompanied the Food Safety Officer during the inspection. Conversely, in a few local authorities, interviewed Food Safety Officers reported that schools were completely unaware of the pilot. When school staff were informed about the letter, they reported they had not received it, suggesting that it may have not gone to the correct inbox or was otherwise overlooked.

Overall, this suggests that the Department's letter raised awareness of the pilot and of the School Food Standards themselves at least in some schools. This supports the suggestion, raised in the Discovery Phase, that the pilot was likely to have some effectiveness as an intervention to help raise awareness of the School Food Standards and schools' responsibilities in relation to these (see Discovery Phase report for more detail on this point).

Catering managers and their staff were less aware of the pilot than receptionists and headteachers, in all probability because they were not contacted directly and therefore relied on being notified by the others in schools who had received the letter. When informed of the check at the food hygiene inspection, Food Safety Officers reported that some catering staff were initially worried and claimed that their head office was responsible for planning menus and understanding the School Food Standards.

## **Summary of Administering the Checks**

In general, both the qualitative interviews and experience survey suggested that Food Safety Officers were happy with the pilot process and found administering the School Food Standards check to be relatively straightforward. In general, officers did not report that the check was causing any major impacts on their food hygiene inspections, although a minority did suggest that the time needed to carry out the check could potentially be an issue. Furthermore, officers did not feel any further training (beyond that provided by the Department for Education and the Food Standards Agency at the start of the pilot) was needed. They reported varying levels of awareness of the checks among school staff, but did not report any instances of schools resisting or declining the checks.

However, officers did raise some uncertainty around specific elements of administering the checks, such as when checking more than one food provision or when staff knowledge of food provision was insufficient.

The majority of local authorities involved in the pilot took a 'focused approach', with one Food Safety Officer who had proactively volunteered carrying out all checks. If rolled out more widely, the advantage of this approach is that it would allow one Food Safety Officer to develop a specialism and interest in the area of school nutrition. However, it may be difficult to implement in a local authority where no Food Safety Officers have pre-existing nutritional experience or are willing to volunteer. In these cases, spreading out the checks across Food Safety Officers may help to minimise impacts on pre-existing duties, although there is a risk that Food Safety Officers in general are less engaged and struggle to build up expertise in carrying out checks.

## 4.2 Content of the Check

### Group differences

In general, in interviews Food Safety Officers in group A reported less challenges around questions when undertaking the check, compared to those in group B. Findings from the Experience Survey support this as Food Safety Officers in group B reported taking longer to complete the check and reported 'lack of staff knowledge' (12/21) as a problem more often than group A (3/11).

Whilst only instructed to use either group A or group B check questions (according to the group to which their local authority was allocated) to complete the check, a few Food Safety Officers also completed checks using the other set of check questions when able to do so. These Food Safety Officers reported on several occasions that they identified potential instances of non-compliance in one set of questions but not necessarily in the other.

"The school was compliant for group A but not group B. I only picked this up because a copy of the menu was shared – it took 30 seconds."

**Food education team, local authority**

It is also worth noting that some Food Safety Officers questioned why there was a need for two groups of questions, or why they had been provided with both question sets although they were required to follow just one, as they felt this risked creating confusion.

## Specific concerns on questions included in the check

Although the experience survey and interviews suggested that overall, Food Safety Officers were happy with how the checks were proceeding, many also felt that the guidance on how to use certain questions to conduct the check was ambiguous or unclear. This resulted in some Food Safety Officers not being able to identify if the food served did or did not comply with [The Requirements for School Food Regulations 2014](#). In group A, Food Safety Officers highlighted two questions as being particularly difficult questions to use in the check:

- ‘Is starchy food cooked in fat or oil provided on more than 2 days each week?’
- ‘Is oily fish provided one or more times every three weeks at lunch?’

The reasons Food Safety Officers found it difficult to use the ‘starchy food cooked in fat or oil’ question to determine non-compliance included it being unclear what stages of the cooking process the starchy food question covered (for example, if frozen chips were pre-fried but then only baked on premises, did this count as being ‘cooked in fat or oil’) and not knowing how food was cooked away from school premises. The reasons cited for the difficulty in using the ‘oily fish’ question included uncertainties regarding the need to consider portion size to determine whether potential non-compliance with this standard occurred.

“Schools mainly cook the food using the oven and undertake no frying onsite so were unsure if foods for example, chips were pre-fried”

**Head of facilities, local authority**

In group B, Food Safety Officers highlighted 4 questions as being particularly difficult to use in the check:

- Are one or more portions of fruit and one or more portions of vegetables provided every day at lunch?
- Is a meat or poultry product provided more often than permitted?

- Are more than 2 portions of food that has been deep-fried, batter-coated or breadcrumb-coated provided each week?
- Is a portion of wholegrain starchy food provided at least once in the week at lunchtime?

The main difficulties Food Safety Officers encountered included defining what is meant by a 'portion' of fruit and vegetables, 'meat product', or 'wholegrain'. Some Food Safety Officers were also unclear on the stages of the cooking process that were covered by the question on 'deep-fried, batter-coated or breadcrumb-coated' products. In particular, they were unsure whether this applied to cooking processes carried out away from school premises, either at the manufacturer or another kitchen.

In addition to these questions, several Food Safety Officers were also confused as to whether they should be counting items or dishes in questions that specify a number for compliance. One specific reported example of this related to fish and chips, which was a common menu item. Here, Food Safety Officers queried whether this should count as two instances of starchy food cooked in fat or oil or food that has been deep-fried, batter-coated or breadcrumb-coated, or just one instance for the whole dish.

To address these issues, Food Safety Officers wanted clear and specific guidance from the Department for Education and the Food Standards Agency. This was particularly the case for those with little or no nutritional expertise. In the absence of this guidance, some Food Safety Officers had drawn on nutritional experts within their local authorities to set their own approach. Whilst this helped support a consistent approach in that particular local authority, it risked leading to a lack of consistency in the application of the checks across pilot areas.

More detail can be found in 'Appendix C: Specific questions for which FSOs raised issues', which provides specific cases reported by Food Safety Officers in interviews in which they were unsure as to whether there was potential non-compliance.

## Reporting outcomes

The outcomes of the checks varied across local authorities and across individual Food Safety Officers. While some Food Safety Officers did not identify any instances of potential non-compliance in any of the checks they completed, others found that all schools had at least one and often multiple instances of potential non-compliance.



Whilst it is possible this may have reflected different levels of compliance by schools in different local authorities, some of the variation is also likely due to individual Food Safety Officers taking different approaches to completing the checks. As described previously, many Food Safety Officers were unsure about how to interpret certain questions, and this may have resulted from different understandings of the check questions. For example, some Food Safety Officers may have been stricter or more lenient in their interpretation of the questions or marked more questions as 'unsure' rather than marking these as instances of potential non-compliance. These individual differences could mean that two Food Safety Officers completing a check in the same school could produce different results.

"I didn't see how it was cooked and I didn't want to make any assumptions so I just put 'not sure' rather than a flag."

**Food Safety Officer**

## Summary of Check Questions

Although the experience survey and interviews suggested that overall, Food Safety Officers were happy with how the checks were proceeding, many also felt that the guidance on how to use certain questions to conduct the check was ambiguous or unclear. Group B in particular reported greater challenges including the lack of school catering staff knowledge. The specific questions that were raised as an issue included the two questions on starchy food and oily fish in group A, and the four questions on fruit and vegetables, meat products, wholegrain, and deep-fried products in group B. To address these issues the officers wanted updated, clear and specific guidance from the Department for Education and the Food Standards Agency.

The outcomes of the checks themselves varied significantly across local authorities and across individual Food Safety Officers, which may have reflected both different levels of compliance by schools in different local authorities but also individual-level variation in how Food Safety Officers were applying the checks.

## 4.3 Disseminating and reviewing check data

This section summarises how and when the check data was disseminated between different stakeholders including schools, caterers, and local authorities.

## Disseminating check data

After conducting the checks at schools, the majority of Food Safety Officers provided a verbal or physical report of the check to school staff while still on-site. Typically, this was given to catering staff or receptionists, although some reported speaking to the headteachers if they were available. When a physical report was provided, this often included a copy of the aide memoire that highlighted where potential non-compliance with the standards was identified. A minority of Food Safety Officers reported not sharing anything with schools on-site as they understood this to be the responsibility of their public health teams or other intervention teams. Some did not feel confident in their response and wanted to check these with public health colleagues before sharing with schools. Others raised concerns about answering any follow-up questions that schools may have had, due to their lack of nutrition expertise or understanding of what follow-up action the local authority or the Department for Education or the Food Standards Agency would take.

“I needed just a bit more info from public health after the inspection to say whether standards were met.”

### **Food Safety Officer**

After conducting checks, Food Safety Officers reported sharing the check data in different ways depending on their local organisational structures, levels of resource and expertise. All Food Safety Officers shared the results within their environmental health teams, and most also shared them with public health teams within the local authority. A small number shared them with county council colleagues, although this was only in instances where the county council had specific teams involved in school food.

At the time the experience survey and interviews with local authority staff were conducted, environmental health, public health, and specialised school food intervention teams were still developing their processes for following up check results with schools and catering companies. As a result, most had not yet contacted schools and catering companies. The minority who had made contact with schools and catering companies

had typically done so by sending a follow-up email to include a summary report outlining any instances of potential non-compliance.

When Food Safety Officers shared check results with their local public health team, they typically shared data for all checks, although a minority only shared check results where potential instances of non-compliance were identified. Some Food Safety Officers reported viewing the purpose of the pilot as collecting data on overall patterns of potential non-compliance, in order to develop nationwide interventions to support schools to meet standards that are commonly not being met. They therefore felt that public health teams should hold off on responding to schools until more data had been collected and the best course of action could be decided.

## Reviewing check results

There were typically only one or two individuals in the participating local authorities involved in receiving and reviewing check results. Such staff who were often located in public health teams, or specialised school food teams, where they existed. When this research was completed, a formalised process for reviewing the checks was still being determined in many of the local authorities, in part because they wanted to wait for more guidance from the Department for Education and the Food Standards Agency before deciding how to do this. However, most participating local authorities were carrying out some kind of process to record the results of the check in addition to the aide memoire and School Food Standards Online Form provided by the Department for Education and the Food Standards Agency.

Local authority processes for recording the results of the check typically included logging results in a dedicated spreadsheet. This kind of data collection was typically seen by interviewed local authority leads as a way to spot any emerging patterns of non-compliance across schools, as checks continued to be collected. Some local authority lead participants reported that they had focused on adding just the details of the potential non-compliance rather than the whole check to reduce time pressures.

Some local authorities with greater resource and nutrition expertise also double-checked any potential non-compliance as part of their review process. This involved getting a copy of the school menu and completing the check again to ensure that the results matched the original Food Safety Officer assessment. The participants doing this suggested that,

due to their expertise, they could do this quality check very quickly so that it did not create capacity issues. Based on this experience, some questioned if menu checks could be conducted as desk research prior to or after food hygiene inspections, directly by individuals with expertise in school food rather than Food Safety Officers, to save time and make the approach more effective.

In some cases, the local authority lead participants who had nutrition expertise reported identifying additional instances of non-compliance, in particular by addressing any 'unsure' responses. This suggests that in local authorities where this validation process is not taking place, there may be an under-estimation of instances of potential non-compliance.

Separately, many local authorities wanted further clarification on the local authority review process from the Department for Education and the Food Standards Agency. They wanted to know whether there should be a pass/fail criteria applied to the checks based on the number of instances of potential non-compliance raised. At the time of the research, as they were unsure, most of them treated any sign of potential non-compliance as needing intervention.

“Without a technical definition of what non-compliance is, we have to tell them “You’ve not met a standard and we are going to give you a heads up that you’ve not met it.”

**Public health consultant**

## **Summary of disseminating and reviewing checks data**

Most of the interviewed Food Safety Officers tended to report the results of the check to receptionists or catering staff before leaving the school. After leaving the school, all Food Safety Officers shared the results within their environmental health teams, and most also shared them with public health teams within the local authority. Where there was a county council with responsibility for, or specific expertise around school food, the check data would also often be shared with them. After receiving the data, a minority of public health teams conducted an informal second review of the check against school food menus. Typically, there were one or two individuals involved in receiving and reviewing the check results, and a formalised process for reviewing had not been developed. Many

local authorities wanted further clarification on the review process from the Department for Education and the Food Standards Agency.

## 4.4 Local authority team responses to the results of the check

### Overall context

When interviews were conducted for this phase of the pilot between December 2022 and January 2023, the pilot had only been running for a few months and so most local authorities were still in the early stages of determining their response. Many reported that they were waiting for more checks or additional guidance from the Department for Education and the Food Standards Agency before deciding on any follow-up actions with schools.

“We’ve put the aide memoires in a digital file and are waiting for instruction. Further advice from FSA and DfE on what we do after we’ve collected the data would help.”

**School foods manager, local authority**

All local authorities had either already informed schools of the results of their check or were planning to do so at a future date. However, none of those had taken or planned any further action in response to the check results.

In general, most local authorities felt limited in their ability to respond to the checks with schools, beyond informing them about their results. In many local authorities this was due to a lack of resource or expertise. In the absence of any staff member or team already engaging with schools around food, follow-ups were reliant on someone with personal interest taking this on outside of their defined role. In some of these areas, the local authority leads had sent checks on to local authority or county council catering services for follow-up, but not to private catering services. One local authority lead reported that this was because they felt better able to engage with public providers and also did not feel private catering services were their responsibility.

## Responses trialled

Although local authorities had not undertaken any actions to respond to the checks, most had started considering how to engage with schools, beyond simply informing them of their check results, to support compliance with the School Food Standards. The exception was environmental health teams involved in the pilot where there were no other teams or individuals working on school food within the local authority. They generally had minimal nutritional expertise and felt that they were limited to informing school of their results so were not considering any further action.

Amongst local authorities that were planning a response, these can be broadly categorised into the three types of responses below:

1. Some local authorities passed the check data directly on to local authority catering services. Those interviewed in the local authority catering teams felt that they could directly respond to feedback by making direct changes to menus in the schools they oversaw. However, this approach was limited only to schools taking up local authority catering provision, which meant all other schools with in-house or private catering would not receive follow-up support. The case study below from Derbyshire Dales Local Authority outlines an example of one of these teams.

### **Local authority catering service case study: Derbyshire Dales**

The Derbyshire County Council Catering Service offers school food provision across 8 local authority areas including the Derbyshire Dales. The catering services manager reported that the pilot has helped develop a good relationship with the Derbyshire Dales Environmental Health Service.

As part of the pilot, they received the results of the check for schools using their food provision. As they were the food business operator responsible for developing menus, they were able to make changes to menus in response to feedback received in the check. They discussed some of the comments and potential instances of non-compliance with the Environmental Health service. For now, this catering service have noted the potential non-compliance, as they want greater clarification before making any changes to the menus.

They perceived the checks as feedback on their service as a food business operator rather than seeing their role as having to review or respond to checks more widely.

“Intervention is really down to whoever does the catering. We have no responsibility to intervene with other schools not under our contract and contractors.”

“What we thought was a compliant menu, we’ve been picked up on and told it isn’t and it’s how they (Food Safety Officers) interpret what is a meat dish and other certain things so this all needs to be ironed out, and we understand that it is a pilot.”

**Catering Services Manager Derbyshire County Council**

### **Environmental Health Statement**

The Environmental Health service have enjoyed working more closely with Derbyshire County Catering and have provided advice and feedback following each visit. Within the local area most school meals are provided by the County Council with a few exceptions. The service has also undertaken Partial Inspections for sides which are lower risk and broadly compliant, to improve efficiency whilst inspecting for hygiene matters. We have been working closely with Public Health and Trading Standards within Derbyshire during this pilot.

**Principal Environmental Health Officer Derbyshire Dales District Council**

2. Local authorities where there was a public health team working in school food, typically had nutrition expertise, although they currently were limiting follow-up support to providing information as they lacked resources for more involved responses. In one local authority, this included offering menu change suggestions to fix potential instances of non-compliance when informing schools of their check results.
3. Finally, the few local authorities with specialised school food traded services offered a more comprehensive service to address potential instances of non-compliance with the School Food Standards. However, this approach requires investment from schools and caterers, and without this they felt there was little scope to influence school food provision. The case study below from Lincolnshire County Council outlines an example of one of these teams.

### **Specialised school food traded service case study: Lincolnshire**

The Lincolnshire County Council food education team supports schools with all aspects

of food. At the moment, only one local authority within the county council, Lincoln City, is involved in the pilot.

They offer a traded service where they check menus for School Food Standards compliance, typically at the cost of £147 a cycle<sup>1</sup>. For the duration of the pilot, they are offering their services at no charge.

They are also able to offer School Food Standards certification, 1-on-1 support to create a compliant menu, and specific School Food Standards training. They also offer a 'whole school food' offer that includes staff training, parent workshops, menu checks, and help with creating school food policies, which costs £1700<sup>2</sup>.

But as they need recipes, product specifications and menus to be able to implement their offer, the caterer must be involved, not just the schools. Without this engagement, they are unable to implement their support. One suggestion they had for instances where the caterer was not engaged was that schools using the same caterer might be able to group together and put pressure on them to take up their offer.

“If the caterer is willing, we can swoop in and turn it around pretty quickly. We could probably fix it in two weeks – this is our exact job.”

**Food Education Team, Lincolnshire County Council**

In addition, some participants from county councils raised concerns about capacity if the pilot were to be widened to include more local authorities. They suggested that they might then need a prioritisation process to manage responses to the checks, which would probably involve prioritising follow-up amongst schools with greater potential non-compliance.

It is also notable that some local authority leads mentioned that they would have liked to have been engaged earlier for involvement in the pilot by the Department for Education and Food Standards Agency, given their expertise around school food nutrition and to allow them more time to plan how to respond to checks.

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<sup>1</sup> Price correct at time of research.

<sup>2</sup> Price correct at time of research.



## School feedback

All local authorities had already informed, or planned to inform, schools and caterers of the outcome of their check. This was done either on-site at schools, or via a follow up email. Communications typically included a summary of which signs of potential non-compliance were raised by the check and contact details to arrange a meeting for further follow-up if the local authority had resource available for this. If an email was sent, participants reported sending this to the headteacher, business manager, or catering services.

In the minority of local authorities where the result of checks had not yet been communicated to schools, staff reported they were in the process of deciding how to communicate the results, including who to send it to, what information to include, how to categorise outcomes, and what action they might recommend.

Amongst those local authorities who had already informed schools and caterers of the outcome of the check in a follow-up email, there had been limited engagement back from schools or caterers by the time that fieldwork for this research was completed in January 2023. While some schools and caterers had shown willingness to engage after initial contact, no follow-up meetings had been scheduled or conducted at the time of the research. There had been very little response from schools or caterers to either on-site reports by Food Safety Officers or follow-up emails by local authorities.

“We’ve emailed schools to let them know there were flags [potential instances of non-compliance] raised – but none of them have replied yet.”

**Food Safety Officer**

## Summary of local authority team responses to the results of the check

Most local authorities were still in the early stages of determining their response to check results at this point in the pilot. Although all either had or planned to inform schools of the results of their check, further action had not yet occurred. Most local authorities felt limited in their ability to respond to the checks beyond informing schools of their results. This was particularly the case in local authorities where environmental health teams did

not have either a public health team that worked on school food, a local authority catering service, or a specialised school food intervention team at the county council level. If these other teams were present, there were responses available including making direct changes to menus, providing menu change suggestions, and/or offering a more comprehensive service to address potential instances of non-compliance.

## **4.5 Future possible responses from local authorities**

Local authority lead participants highlighted a range of future possible responses to potential non-compliance that they might consider taking in future or that could be integrated into the programme as it develops.

### **Provision of informational or educational support**

These suggestions included informational or educational support provided to schools and caterers by the local authority, such as signposting to existing online guidance or resources, or highlighting potential non-compliance and offering suggestions for alternative options. Some also suggested that guidance could be accompanied by the offer of direct support where there were existing programmes or expertise. Many participants also suggested that training on the School Food Standards for headteachers, governors, and caterers would be useful. They suggested that this could come from the local authority but would ideally be developed as a national mandatory course from the Department for Education and the Food Standards Agency.

### **Recognition of compliance**

Other suggestions involved doing more to recognise and promote compliance, such as adding specific nutritional School Food Standards criteria to certification schemes such as the Healthy Schools or the Healthy Weight programme. Participants suggested that if a consistent area of non-compliance was being flagged in checks, adding a specific criterion for this could be helpful.

## Stricter enforcement for non-compliance

Some local authority lead participants interviewed felt that supportive approaches would not be sufficient to tackle non-compliance amongst some commercial caterers in particular, making stricter enforcement necessary.

For example, one county council team reported receiving checks that consistently raised multiple potential instances of non-compliance for a particular private caterer that served many schools in the area. Despite repeated attempts, the caterer had not engaged with them up to this point in the pilot.

“Some caterers know they aren’t compliant but will keep going until they are told no. This isn’t ignorance anymore, its wilful non-compliance.”

**Food education team, local authority**

One participant suggested that the inclusion of check results in Ofsted inspections could help drive change, as these were something schools already cared about and took seriously. Another suggested the creation of a rating system from the results of the check that was published and sent to parents.

## Consideration of cost pressures in current climate

It is important to highlight that many participants felt that schools were struggling due to funding and cost-of-living pressures. Alongside this, they highlighted that for many students in this context, school food might be their only hot meal of the day. As such, they felt that providing something that students would want to eat was more important than perfect compliance with the standards.

“It’s cheaper to serve sausages than a chicken breast... there’s a definite degree of nervousness around rising costs, utilities, national insurance, that’s the general feeling across all caterers.”

**Food education programme officer, local authority**

## Summary of future possible responses from local authorities

Local authority respondents' suggestions for future possible responses to potential non-compliance found from the checks ranged from the provision of informational support to stricter enforcement. Informational or educational support was suggested in the form of online guidance and training, with more direct support where resources were available from local authorities. Recognising or promoting compliance was also suggested, for example including areas covered by the check as a criterion for certifications schemes. Some local authority participants felt that supportive approaches would not be sufficient for everyone due to their experience trying to engage commercial caterers and schools. They suggested tackling compliance for those who did not engage with support services might require the publication of results or inclusion in Ofsted inspections.

## **5.0 Recommendations**

Several considerations arose from this research regarding both the checks themselves and the processes for delivering and responding to them. These are outlined below, alongside some recommendations as to how to resolve them to optimise the next phase of the pilot.

### **5.1 Optimising the delivery of the check**

#### **Clear rationale for Food Safety Officers involvement in the pilot**

Food Safety officer participants wanted to know more about the process, and some suggested they might become disengaged if they felt that the checks were not having a positive impact. To tackle this, any wider roll-out should be supported by a set of unambiguous processes, a clear rationale for Food Safety Officer involvement in the pilot to support engagement, and feedback to Food Safety Officers on how the results from the checks have been used to improve standards.

#### **Revisiting questions to address Food Safety Officers concern**

While Food Safety Officers had generally found the process of administering the checks straightforward, they did feel that some of the questions and guidance were unclear. This may have led to some inconsistencies in how the checks were applied as some sought guidance from within their local authority. To resolve this as the pilot proceeds, the questions and guidance should be revisited to address Food Safety Officers' concerns.

#### **Standardising checking approach**

To optimise the checks, the approach to checking and reporting the results of multiple provisions in a school should be consistent. This could be done by specifying which provisions to check in different circumstances they may encounter at schools.

Furthermore, clarity on whether reporting multiple provisions is needed; for example, combining checks on a single or multiple aide memoires.

## **Involving public health teams**

Some respondents from public health teams felt that they could be more involved in the pilot and considered themselves well-placed to provide support due to their expertise in the subject area. Such support might involve piloting communications, training and coordination activities to encourage greater engagement from FSOs and environmental health teams.

## **Opting for a single question bank**

There was some confusion about the purpose of the two groups of questions for different local authorities. This may have inadvertently reduced the reliability of the checks. For example, it was found that a school may be compliant using set A questions and non-compliant using set B questions. Creating a single set of questions or a question bank to draw upon would help to ensure consistency. To identify the best questions the results of the checks should be analysed, looking in particular at the 'unsure' responses.

## **5.2 Optimising the response**

### **Central support requirement**

Findings also raised implications for considering how local authorities can best respond to instances of non-compliance in schools as a result of the checks. Local authorities had widely varying levels of resource and expertise for responding to the checks suggesting that a standardised approach for responding to checks might not be possible without central support from the Department for Education and the Food Standards Agency.

### **Investigating rationale behind 'unsure' responses**

Some of the checks included 'unsure' responses and the frequency of these differed across local authorities. Ideally, these would be minimised and the frequency of 'unsure' responses similar across local authorities in the next phase of the pilot. Therefore, it could be helpful to investigate local authorities where unusual levels of 'unsure'

responses occurred, considering those that are both higher and lower than average. This could help to reveal where guidance wasn't clear or where local authorities had suggested a particular approach, helping to feed into the development of standardised guidance going forward.

## **Sharing best practice across local authorities**

Several local authorities had developed templates for reporting back to schools. The Department for Education and/or the Food Standards Agency could coordinate sharing best practice to encourage all local authorities to undertake this follow-up response and reduce variation between local authorities.

## **Aggregating data on checks**

Finally, many respondents felt that aggregate data on checks could be used to identify common trends and coordinate a more effective response within or across local authorities. For example, if they highlighted general patterns or commonly identified issues this could be communicated to schools in absence of bespoke responses.

## 6.0 Conclusion

Feasibility Study Phase 1 was intended to evaluate the ongoing pilot following its launch in September 2022 to understand how local authorities and Food Safety Officers were managing the pilot and to identify any problems and difficulties they faced in conducting or interpreting the Check.

Overall, both Food Safety Officers and local authorities reported that the pilot process was working well. Feedback from the FSOs highlighted ambiguities in some of the Check questions and how to report multiple provisions across the school day. Many local authorities wanted more guidance and support on how they should respond to the results of the Check, particularly in local authorities that did not have specific nutritional expertise or public health team engagement with schools.

The findings also point to several ways in which the Department for Education and the Food Standards Agency could help to support the delivery of the pilot and follow-up responses by local authorities. Where feasible, these improvements might be implemented within the next phase of the pilot.



## 7.0 Reference list

Department for Levelling Up, Housing and Communities. (2022). Levelling Up the United Kingdom. [online] GOV.UK. [Levelling Up the United Kingdom - GOV.UK](#)

Department for Education (2014). The Requirements for School Food Regulations 2014. [online] GOV.UK. [The Requirements for School Food Regulations 2014](#)

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

The authorities selected to participate in the pilot are:

## **Group A Local Authorities:**

Blackpool Council

Chelmsford City Council

City of Bradford Metropolitan District Council

City of Lincoln Council

City of Wolverhampton Council

Plymouth City Council

Royal Borough of Greenwich

Telford & Wrekin Council

## **Group A Questions:**

1. Are snacks other than nuts, seeds, vegetables and fruit available?
2. Are more than 2 portions of food which include pastry provided each week?
3. Is starchy food cooked in fat or oil provided on more than 2 days each week?
4. Is oily fish provided one or more times every three weeks at lunch?
5. Are cakes, biscuits or desserts available outside of lunchtime?
6. Is free fresh drinking water available at all times?

## **Group B Local Authorities:**

Derbyshire Dales District Council

Herefordshire Council

Newham Borough Council

Nottingham City Council

Oldham Metropolitan Borough Council

Peterborough City Council

South Tyneside Council

Tonbridge and Malling Borough Council

**Group B Questions:**

1. Fruit and vegetable provision
2. Is a meat or poultry product provided more often than permitted?
3. Are confectionery, chocolate and chocolate coated products available?
4. Are more than 2 portions of food that has been deep-fried, batter-coated or breadcrumb-coated provided each week?
5. Is a portion of wholegrain starchy food provided at least once in the week at lunchtime?
6. Are non-permitted drinks available?

\* 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: Aide Memoire



## Aide memoire: School Food Standards Check

Name of School:

Name of Food Business Operator (FBO):

Type of school food business: in-house/local authority/private contractor/other (please write in)

Type of provision: Breakfast/lunch/after-school/other (please write in)

School phase: Primary/Secondary/other (please write in)

Date and approximate time of check (dd/mm/yyyy) & (hh/mm)

Time taken to check:    minutes

Standard applies to	Group	Aspect	Information about the check [You can refer to guidance for more detail]	Check – choose one: <input type="checkbox"/> = Flag	Officer's Comments and Observations
-	-	-	Options to conduct check include menu checks (preferred), asking staff, direct observations.	<b>Y= Yes, N= No, U = Unsure NC=Not checked, NA = Not applicable</b>	Include how the check is completed and notes for the local authority.
Whole school day	A	1. Are snacks other than nuts, seeds, vegetables and fruit available?	Snacks other than nuts, seeds, vegetables and fruit are not permitted.  You may observe these items in food	Y ( <input type="checkbox"/> )    N  U    NC    NA	-

Standard applies to	Group	Aspect	Information about the check [You can refer to guidance for more detail]	Check – choose one: <input type="checkbox"/> = Flag	Officer's Comments and Observations
			stores, outlets or vending machines. In this scenario, where you can, confirm with the FBO if they provide these items before determining an answer.		
Whole school day	A	2. Are more than 2 portions of food which include pastry provided each week?	<p>Pastry includes shortcrust, flaky, filo, choux and puff, used in food such as quiches, meat pies, fruit tarts, sausage rolls, pasties and samosas.</p> <p>Do not focus on portion size which is not regulated. Focus instead on how often food with pastry is provided.</p> <p>Catering staff can help confirm if the items provided include pastry.</p>	Y ( <input checked="" type="checkbox"/> ) N U NC NA	Record number of portions provided each week

Standard applies to	Group	Aspect	Information about the check [You can refer to guidance for more detail]	Check – choose one: <input type="checkbox"/> = Flag	Officer's Comments and Observations
Whole school day	A	3. Is starchy food cooked in fat or oil provided on more than 2 days each week?	<p>These foods can include: roast or sautéed potatoes; chips; potato wedges; pre-prepared potato products; fried rice, fried bread or fried noodles; hash browns; garlic bread; Yorkshire pudding; chapattis and naan made with fat; pancakes and waffles.</p> <p>This standard also includes food where fat or oil has been added during the manufacturing process. A menu will likely not explain what the food was cooked in or whether fat or oil has been added during the manufacturing process. This may require a conversation with catering staff.</p>	<p>Y (<input checked="" type="checkbox"/>)    N</p> <p>U    NC    NA</p>	Record number of days starchy food provided each week

Standard applies to	Group	Aspect	Information about the check [You can refer to guidance for more detail]	Check – choose one: <input type="checkbox"/> = Flag	Officer's Comments and Observations
Lunch only*	A	4. Is oily fish provided at least once every three weeks at lunch?*	Oily fish includes anchovies, herring, kipper, mackerel, pilchards, salmon, sardines, trout, tuna (but not canned tuna) and whitebait.  You will need to consult menus covering multiple weeks of service (at least three weeks) or discuss with catering staff.	Y <input type="checkbox"/> N <input checked="" type="checkbox"/> U NC NA	-
Service outside of lunch**	A	5. Are cakes, biscuits or desserts available outside of lunch?*	Cakes and biscuits: include manufactured, bought-in products and prepared from scratch cakes and biscuits such as individual cakes, buns and pastries, scones, tray bakes, muffins, doughnuts, flapjack sweet and savoury biscuits.	Y <input checked="" type="checkbox"/> N <input type="checkbox"/> U NC NA	-

Standard applies to	Group	Aspect	Information about the check [You can refer to guidance for more detail]	Check – choose one: <input type="checkbox"/> = Flag	Officer's Comments and Observations
			<p>The only permitted desserts outside of lunchtime are yoghurt or fruit-based desserts.</p> <p>You may observe these items in food stores, outlets or vending machines. In this scenario, where you can, confirm with the FBO if they provide these items before determining an answer.</p>		
Whole school day	A	6. Is free fresh drinking water available at all times?	<p>The free fresh drinking water may be available but not provided by the FBO.</p> <p>You may observe or be informed that there are free and accessible taps/fountains/water coolers, or you can</p>	<p>Y N (<input type="checkbox"/>)</p> <p>U NC NA</p>	-



Standard applies to	Group	Aspect	Information about the check [You can refer to guidance for more detail]	Check – choose one: <input type="checkbox"/> = Flag	Officer's Comments and Observations
			check with staff. If this occurs, record yes.		
The standard applies to the whole school day, but the standard differs dependent on the time of day	B	<p>7. If checking lunch service:</p> <p>Are one or more portions of fruit AND one or more portions of vegetables provided every day at lunch?</p> <p>If checking service outside of lunch:</p> <p>Is either fruit or vegetables or both available every day this week?</p>	<p>Fresh, frozen or dried fruit and vegetables count towards meeting this standard.</p> <p>Pulses (peas, beans and lentils) count as vegetables.</p> <p>Canned fruit and vegetables must only be provided in water or juice.</p> <p>Fruit or vegetable juice does not count for this standard.</p> <p>Potatoes do not count as a portion of vegetables.</p> <p>Do not focus on the amount of fruit or vegetable available or its quality.</p>	<p>Y N (<input checked="" type="checkbox"/>)</p> <p>U NC NA</p>	-

Standard applies to	Group	Aspect	Information about the check [You can refer to guidance for more detail]	Check – choose one: <input type="checkbox"/> = Flag	Officer's Comments and Observations
Whole school day	B	8. Is a meat or poultry product provided more often than permitted?	<p>A meat product is a food where meat has been added as an ingredient.</p> <p>Meat or poultry products include: sausages; burgers; Scotch pies, bridies, sausage rolls, Cornish pasty, encased meat pastry pies, cold pork pie; breaded or battered shaped chicken and turkey products, e.g. nuggets, goujons, burgers.</p> <p>These are permitted up to once a week in primary schools and up to twice a week in secondary schools.</p> <p>To check if a meat product has been served, you may need</p>	<p>Y (<input checked="" type="checkbox"/>)    N</p> <p>U    NC    NA</p>	Record number of meat or poultry products provided each week

Standard applies to	Group	Aspect	Information about the check [You can refer to guidance for more detail]	Check – choose one: <input type="checkbox"/> = Flag	Officer's Comments and Observations
			to discuss with catering staff.		
Whole school day	B	9. Are confectionery, chocolate and chocolate coated products available?	<p>This includes: chewing gum, cereal bars, processed fruit bars, non-chocolate confectionery (whether or not containing sugar), chocolate in any form (except hot chocolate), any product containing or wholly or partially coated with chocolate and any chocolate-flavoured substance.</p> <p>Cocoa powder is permitted as it can be used in cakes, biscuits and puddings or in permitted drinks.</p> <p>You may observe these items in food stores, outlets or</p>	<p>Y (<input checked="" type="checkbox"/>) N</p> <p>U NC NA</p>	-

Standard applies to	Group	Aspect	Information about the check [You can refer to guidance for more detail]	Check – choose one: <input type="checkbox"/> = Flag	Officer's Comments and Observations
			vending machines. In this scenario, where you can, confirm with the FBO if they provide these items before determining an answer.		
Whole school day	B	10. Are more than 2 portions of food that has been deep-fried, batter-coated or breadcrumb-coated provided each week?	<p>Deep fried foods including those deep fried or flash fried in the kitchen or in the manufacturing process, such as chips (including oven chips), potato waffles, hash browns, samosas, plantain chips, spring rolls, doughnuts, pakora and bhajis.</p> <p>Batter-coated and breadcrumb-coated foods: include any bought-in or homemade products such as chicken nuggets, fish fingers,</p>	<p>Y (<input checked="" type="checkbox"/>)    N</p> <p>U    NC    NA</p>	Record number of portions provided each week

Standard applies to	Group	Aspect	Information about the check [You can refer to guidance for more detail]	Check – choose one: <input type="checkbox"/> = Flag	Officer's Comments and Observations
			<p>battered onion rings and tempura.</p> <p>A menu will likely not explain how the food was cooked or prepared. This may require a conversation with catering staff.</p>		
Lunch only*	B	11. Is a portion of wholegrain starchy food provided at least once in the week at lunch?*	<p>Examples of wholegrain food include: wholemeal and granary flours, wholemeal and granary breads and bread products, wholewheat pasta, brown rice and oats.</p> <p>To check this, you may need to discuss with catering staff.</p>	<p>Y N (<input type="checkbox"/>)</p> <p>U NC NA</p>	-

Standard applies to	Group	Aspect	Information about the check [You can refer to guidance for more detail]	Check – choose one: <input type="checkbox"/> = Flag	Officer's Comments and Observations
Whole school day	B	12. Are non-permitted drinks available?	<p>Examples of non-permitted drinks are: flavoured water, soft drinks (e.g. cola, lemonade) and energy drinks.</p> <p>Permitted drinks include: Plain water (still or carbonated); lower fat milk or lactose reduced milk; fruit or vegetable juice; plain soya, rice or oat drinks; plain fermented milk (for example yoghurt) drinks; combinations of fruit or vegetable juice with plain water (still or carbonated, with no added sugars or honey); tea; coffee; hot chocolate.</p> <p>Do not spend excessive time trying to determine if the combination or</p>	<p>Y (<input checked="" type="checkbox"/>)    N</p> <p>U    NC    NA</p>	-

Standard applies to	Group	Aspect	Information about the check [You can refer to guidance for more detail]	Check – choose one: <input type="checkbox"/> = Flag	Officer's Comments and Observations
			<p>flavoured drinks are permitted. Focus more on identifying if any non-permitted drinks are available.</p> <p>You may observe these items in food stores, outlets or vending machines. In this scenario, where you can, confirm with the FBO if they provide these items before determining an answer.</p>		

\* If not checking lunch service, record NA for this aspect

\*\* If checking lunch service, record NA for this aspect

Group A – Local authorities: Blackpool, Chelmsford, Bradford, Lincoln City, Wolverhampton, Plymouth, Greenwich, Telford and Wrekin

Group B – Local authorities: Derbyshire Dales, Herefordshire, Newham, Nottingham City, Oldham, Peterborough, South Tyneside, Tonbridge and Malling

## Appendix C: Specific questions for which FSOs raised issues

Question	Issue Raised	Specific Case Examples
<p><b>Q 1(B)</b> - Are one or more portions of fruit and one or more portions of vegetables provided every day at lunch?</p>	<p>Unclear what constituted a 'portion' of fruit and vegetables and whether this was a certain weight, size, or amount.</p>	<p>Fruit on top of a pudding Vegetables on top of a pizza slice</p>
<p><b>Q 2(B)</b> - Is a meat or poultry product provided more often than permitted?</p>	<p>Unclear what was defined as a 'meat product' and if this only meant 'processed meat product'.</p>	<p>Using mincemeat in a burger versus in a Bolognese sauce, was this a meat product in neither, one, or both instances</p>
<p><b>Q 3(A)</b> - Is starchy food cooked in fat or oil provided on more than 2 days each week?</p>	<p>Unclear which processes this question covered and whether it applied to how food had been cooked off-site.</p>	<p>Cooking tray oiled prior to baking food</p>
<p><b>Q 4(A)</b> - Is oily fish provided one or more times every three weeks at lunch?</p>	<p>Question from those with nutritional expertise around whether tuna should be included. Also, unclear whether a certain quantity or quality of oily fish was needed.</p>	<p>Tuna mentioned in the aide memoire guidance section but no longer falls under the NHS definition of oily fish</p>
<p><b>Q 4(B)</b> - Are more than 2 portions of food that has been deep-fried, batter-coated or breadcrumb-coated provided each week?</p>	<p>Unclear which processes this question covered and whether it applied to how food had been cooked off-site.</p>	<p>Pre-fried food that was oven-baked on premises</p>



<p><b>Q 5 (B)</b> - Is a portion of wholegrain starchy food provided at least once in the week at lunchtime?</p>	<p>Question from those with nutritional expertise around whether granary flour should be included.</p>	<p>Guidance indicated granary flour/bread is included but this doesn't fall under the technical definition of wholegrain</p>
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## Appendix D: Experience Survey

This text below was written up into online survey software and hosted online. The link for the survey was sent to all Food Safety Officers who completed at least one check.

### Block A: Screening questions

Thank you for your participation in the School Food Standards Compliance Pilot and for taking the time to complete this survey.

This survey is being conducted by Kantar Public on behalf of the Food Standards Agency and the Department for Education.

The School Food Standards Compliance Pilot is testing a new approach for local authorities in assuring and supporting compliance with the School Food Standards. This approach involves Food Safety Officers carrying out checks in schools to identify possible non-compliance with the School Food Standards.

This survey will enable us collect valuable feedback on your overall experience as the pilot progresses, which will be crucial for informing the approach going forward. Thank you for your contribution.

To understand more about how Kantar keeps your data safe and to read our privacy policy, please visit: <https://www.kantar.com/uki/surveys/>

Do you agree to participate?

1. Yes
2. No – screen out

### Block B: School Food Standard check

Question number	Question	Answer
1.	In how many schools have you conducted food hygiene inspections since 26th September 2022?	[allow integers only]

Question number	Question	Answer
2.	In how many of the schools have you conducted School Food Standards check alongside these inspections since 26th September 2022?	[allow integers only] [if 0 go to end of survey message]
2b	<p>[IF Q1 ≠ Q2]</p> <p>Why did you not undertake the School Food Standards check in all schools where you were conducting a food hygiene inspection?</p> <p>Please select all answers that apply.</p>	<ul style="list-style-type: none"> <li>• Not enough time to include School Food Standards check</li> <li>• School staff were unprepared or unwilling to conduct the School Food Standards check</li> <li>• Schools were ineligible or out of scope for the check</li> <li>• I did not feel adequately prepared to implement the School Food Standards check</li> <li>• Local authority decision</li> <li>• Other (please specify) - _____</li> </ul>
3.	Did staff at any of the schools express any concerns about you conducting the School Food Standards check?	Yes, in all schools; Yes, in some schools; No

**Block C: Support for the check from local authorities/FSA**

Question number	Question	Answer
4.	Did you do any of the following to prepare for the School Food Standards check? (Select all that apply)	<ul style="list-style-type: none"> <li>- Read the written guidance from FSA/DfE</li> <li>- Attended a briefing delivered by FSA/DfE</li> <li>- Received local authority training or guidance</li> <li>- Undertook self-guided learning (for example, researching the School Food Standards)</li> <li>- Other [write in]</li> <li>- No preparation</li> </ul>
4b.	[If 4= is not 'no preparation'] Approximately how much time did you spend on learning/preparing to undertake the School Food Standards check? Please record your answer in minutes.	[allow integers only]
5	ASK ALL  To what extent do you agree with the statement: "I have enough understanding of the School Food Standards check"	Strongly agree/Agree/Neither agree nor disagree/Disagree/Strongly disagree

**Block D: School Food Standards check experience**

Question number	Question	Answer
6.	Which group of questions were you using for the School Food Standards checks?	Group A only Group B only Group A and B

7. We would like to know what may have supported you to complete the School Food Standards checks. Which of the following did you attend or use, and how helpful did you find them for completing the check?

**Block D: School Food Standards check experience**

-	Very helpful	A little helpful	Not helpful	Did not attend/use
Staff knowledge at schools	-	-	-	-
The aide memoire	-	-	-	-
Guidance or briefings provided by FSA/DfE	-	-	-	-
Training or guidance provided by my local authority	-	-	-	-
Menus	-	-	-	-
Observations at schools	-	-	-	-

8. We would like to know if you had any difficulties when completing the School Food Standards checks. For each statement, please select whether they were a large problem, a small problem or not a problem.

**Block D: School Food Standards check experience**

-	<b>A large problem</b>	<b>A medium problem</b>	<b>A small problem</b>	<b>Not a problem</b>
Length of the check	-	-	-	-
Staff knowledge to support the check	-	-	-	-
Staff availability	-	-	-	-
Menu availability	-	-	-	-
Being able to interpret menus to complete the check	-	-	-	-
Being unable to make meaningful observations	-	-	-	-

9: Have you sought additional guidance from others within your local authority (for example, nutritionists or School Food Standards experts) to help you understand or interpret the standards that you are checking? Please do not include the training, guidance or briefings initially provided by local authorities, the Department for Education or the Food Standards Agency.

A: Yes/No

#### **Block D: Post check and reflections**

<b>Question number</b>	<b>Question</b>	<b>Answer</b>
10.	Who did you share the School Food Standards check data with?  This should include specific teams within your local authority or anyone at	- Public Health  - Environmental Health  - My manager  - The school itself

Question number	Question	Answer
	the schools themselves. Please select all that apply.	<ul style="list-style-type: none"> <li>- Catering company staff at schools</li> <li>- Other [write-in]</li> </ul>
11.	On balance, how confident are you that the data you collected in School Food Standards checks accurately reflected compliance with the School Food Standards?	Very confident, quite confident, neither confident nor unconfident, quite unconfident, very unconfident
11b.	[If 11 = not 'Very confident'] What concerns did you have about the <b>accuracy</b> of the School Food Standards checks? Select all that apply	<ul style="list-style-type: none"> <li>• There was conflicting information</li> <li>• The School Food Standards check questions didn't cover all relevant areas of school food</li> <li>• I was unable to make all of the observations I wanted to</li> <li>• I did not feel I could answer the questions accurately</li> <li>• None of the above</li> <li>• Other – please specify</li> </ul>

Now, we just have a couple of questions about your knowledge and interest before participating in the pilot.

### **Block E: Nutrition and food knowledge**

Question number	Question	Answer
12.	Compared to other Food Safety Officers, would you say you have more, less or a similar level of knowledge or interest in nutrition and food?	<ul style="list-style-type: none"> <li>• More knowledge or interest in nutrition and food</li> <li>• Similar level of knowledge or interest in nutrition and food</li> <li>• Less knowledge or interest in nutrition and food</li> <li>• Don't know</li> </ul>
13.	Did you volunteer to take part in the pilot because of a personal interest in this topic?	<ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>

**End of survey message**

Thank you for participation! You have now reached the end of the survey.

Lastly, in the next phase of this research, we are hoping to speak to Food Safety Officers about their experience with the School Food Standards check in more detail. This would involve an hour-long online discussion via Zoom with one of our researchers.

Would you be happy to be recontacted to take part in this?

Yes

No



# Appendix E: Copy of letter sent to schools



Department  
for Education



Food  
Standards  
Agency  
food.gov.uk

**Department for Education**

23 Great Smith Street

London SW1 3DJ

**21 September 2022**

Dear Headteacher,

The Department for Education and the Food Standards Agency are launching a pilot, supported by the Office for Health Improvement and Disparities, to design and test a new approach for local authorities in assuring and supporting compliance with the [School Food Standards](#). The pilot was initially announced in the [Levelling Up White Paper](#) earlier this year and will start later this month and run for the full academic year. It will take place across eighteen local authorities in England.

This government wants pupils to be healthy and well nourished. We encourage a healthy balanced diet and healthy life choices. The pilot will test whether local authority Food Safety Officers carrying out food hygiene inspections are able to ask the right questions, check menus and make observations related to the School Food Standards to identify potential non-compliance. Where instances of potential non-compliance are raised, the pilot will test whether local authorities are able to support schools and help make improvements. By increasing levels of assurance of the standards we hope to see greater levels of compliance, and ultimately school children having access to healthier and more nutritious food.

Your local authority is one of eighteen that have volunteered to participate in the pilot. This means that if a Food Safety Officer visits your school to conduct a food hygiene inspection within this academic year, they may carry out a School Food Standards check.

Compliance with the School Food Standards is mandatory for all maintained schools including academies and free schools. School governors have a responsibility to ensure compliance and should appropriately challenge the headteacher and the senior leadership team to ensure the school is meeting its obligations.

We know that leaders in schools recognise the importance of healthy school food, in terms of behaviour, attainment and children's health. To help ensure all children have access to healthy balanced meals that will benefit their development, we would welcome and encourage your engagement with the pilot. If a School Food Standards check is carried out at your school, you will also receive some feedback from the Food Safety Officer on the check that was carried out.

As part of the pilot, your school may be invited to participate in research, which will help us assess the effectiveness of the pilot from your perspective. This may include short surveys and in-depth interviews and all participation is voluntary. We would kindly ask you to participate as your insights will be extremely valuable.

It is worth noting that data from the School Food Standards checks that are carried out during the pilot will not be made publicly available by the Department for Education, the Food Standards Agency or local authorities and the responses will not affect the result of your food hygiene inspection.

It would be helpful if you could share the information in this letter with the school catering team, given they are most likely to engage directly with the Food Safety Officers.


Please do not publicise the pilot or your participation in it without contacting [redacted]

Further information on the School Food Standards can be found at: [School food standards: resources for schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/school-food-standards-resources-for-schools)

If you have any further questions about the pilot, our contact email address is: [redacted]

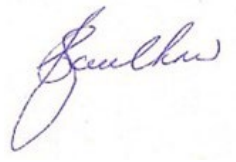
Yours sincerely,

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Emily Whitehead

Deputy Director, Behaviour, Exclusions and School Food, Department for Education



Sam Faulkner

Deputy Director, Strategy Unit, Food Standards Agency



Department  
for Education



Government  
Social Research

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