

School Food Standards: updating the legislative framework

Consultation response from the National Governance Association, 12 June 2026

Introduction

The National Governance Association (NGA) is the sector body for school and trust governance in England, representing the interests of school governors, trustees and governance professionals across all types of schools and school structures. As the membership organisation for school governance, we support and champion good governance as the primary and first line of responsive, contextually sensitive accountability.

Governing boards have a statutory responsibility to ensure adherence to School Food Standards and are crucial in establishing a positive school food culture.

NGA broadly welcomes the proposed updates to the School Food Standards, recognising the importance of ensuring every child has access to high-quality and nutritious food during the school day. We know that our schools and trusts play an instrumental role in supporting pupils to develop healthy habits and behaviours that extend into adulthood, with good nutrition underpinning both wellbeing and readiness to learn.

We also welcome the role these standards play in addressing issues of food insecurity in England, which currently affects millions of children in this country. This comes alongside government rollout of free breakfast clubs and expansion of free school meal eligibility – initiatives NGA have championed, as part of a joined-up approach to improving children’s health, wellbeing and access to education.

However, as we mentioned in our response to the consultation on supporting pupils with medical needs and allergies in schools, we remain unconvinced that the proposed named governor model for school food is the most effective way to support the implementation of the guidance and its crucial ambition for the following reasons:

- **Collective responsibility:** school governance, by definition, is a collective responsibility, so assigning a single named governor risks undermining established principles of shared accountability, with no evidence that it improves oversight.
- **Risk of reduced effectiveness:** the proposal could unintentionally weaken scrutiny by shifting responsibility away from the full board.
- **Workload and recruitment pressures:** boards already struggle to recruit governors (in 2025, 66% reported difficulties and only 30% had no vacancies), so adding specific individual responsibilities could increase pressure and make recruitment harder without clear benefits.
- **Risk of over-reliance on individuals:** link governor models can concentrate expertise in one person, which may lead others to disengage and create gaps when that individual leaves.

- **The need for flexible and context-led governance:** schools should be able to decide how to allocate responsibilities based on their own structures and priorities, with areas like school food potentially fitting into many boards' existing committees or link roles.
- **Importance of alignment and training:** any new expectations should align with current governance practice and be supported by proper training, including fully funded induction for new governors and trustees, as training is key to effective oversight.

We have already engaged in discussion with the school food unit at the DfE, and NGA remains committed to being a pragmatic and collaborative organisation that seeks to support core compliance processes being implemented most effectively.

Practical considerations

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

From a governance perspective, the key challenge will be ensuring that boards receive sufficient assurance that the new standards are being implemented effectively without creating disproportionate additional monitoring and reporting burdens.

Many schools and trusts will need to review existing contracts with catering providers, relevant policies and internal assurance arrangements to ensure they align with the revised requirements. Boards will need clear information from school leaders about costs and implementation timelines as well as any associated risks. Given the budgetary pressures facing most schools, the changes should be fully funded or cost neutral.

The proposals introduce a number of detailed requirements, including new breakfast standards and restrictions on specific food categories. Governing boards are unlikely to have specialist expertise in school food and nutrition and so may find it challenging to determine what constitutes appropriate oversight and assurance. The DfE could support implementation by producing practical monitoring resources for boards setting out the key areas governing boards should seek assurance on without creating unnecessary bureaucracy. This should recognise the different governance and accountability arrangements that exist across maintained schools and academy trusts.

Compliance with the School Food Standards

Question 35. To what extent do you agree that schools having a governor with responsibility for school food would help ensure schools follow the School Food Standards?

Strongly disagree

As we explained in our response to the allergies/medical needs consultation, the proposal to require a named governor to take responsibility may be well-intentioned, but in practice, it feels haphazard and risks being counterproductive.

Crucially, governance responsibilities are discharged by a collective body and so the proposal runs counter to well established governance principles. NGA is unconvinced that such an approach strengthens oversight and may instead dilute shared accountability.

We are also acutely aware of the implications of the potential overreliance on individual board members. Boards are already facing significant recruitment challenges: in 2025, 66% of respondents reported difficulty recruiting governors or trustees, and only 30% of boards had no vacancies. Adding named responsibilities risks compounding workload pressures without necessarily improving oversight.

Historically, link governor models have sometimes led to expertise and oversight becoming concentrated in one individual, with other board members viewing the area as “someone else’s responsibility”. There are tangible concerns that expertise and effective scrutiny could be lost or weakened when that individual leaves the board.

Fundamentally, NGA supports boards being able to make decisions about their composition and allocation of responsibilities based on their own priorities and circumstances. Many of these areas intersect with one another, and schools may already have committee structures or optional link governors covering related issues (such as poverty, inclusion or compliance). School food may sit naturally within those existing arrangements.

Any additional expectations placed on schools are most likely to be effective where they align with existing governance practice and provide boards with the flexibility to determine the most appropriate arrangements for their context. Boards will also be most able to effectively deliver these and similar functions if they can access appropriate training, something we have worked on with the Department previously through our joint e-learning module on this topic. We have long made the case for mandated, fully-funded induction training for all new governors and trustees, and school food would be an important component of any approach.

Question 36. To what extent do you agree that schools publishing their school food policy on their website would help ensure they meet the School Food Standards?

Agree

NGA agrees that publishing a food policy on a school's website could support transparency and accountability. As with other published policies and statements, it provides parents and other stakeholders with a clear understanding of the school's approach and can support constructive dialogue where concerns arise. Publication may also help schools articulate how their food provision supports wider objectives relating to health, wellbeing and inclusion, while providing a clear reference point should questions or complaints arise. However, publication alone should not be viewed as a substitute for effective implementation or assurance. Compliance with the standards depends on day-to-day operational practice.

To maximise implementation, the Department should ensure that any publication requirements are aligned with existing guidance, eg what schools must publish online. Clear guidance should also be provided on review cycles, ownership and expectations for publication. In our experience, ambiguity or inconsistency between DfE guidance documents is a common source of confusion for boards.

Question 37. What practical methods do you think schools could take to help ensure they meet the School Food Standards?

- Ensuring school food policies and catering contracts are reviewed and updated to reflect the revised standards.
- Establishing clear reporting arrangements so that governing boards and trustees receive proportionate assurance regarding compliance and implementation challenges and monitor impact.
- Incorporating school food compliance within existing internal assurance, audit or quality assurance processes where appropriate.
- Providing training and/or guidance for governing boards and relevant staff, particularly those responsible for catering management and/or contract oversight.
- Engaging pupils and parents to inform changes (eg new menus) and encourage take-up of school meals.
- Ensuring that arrangements relating to allergies, medical needs, SEND, cultural and religious requirements are considered alongside implementation of the standards.

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

- Assess costs of the changes, and implications at the point of transition, to ensure there is no unintended or negative consequences (such as further burden on budget and capacity to deliver core responsibilities/focus of schools).
- Funded training to support boards and leaders in meeting the standards – this would be most effective if integrated with a wider professional development training offer.
- Publishing clear and consolidated guidance explaining the standards and how compliance can be demonstrated.
- Providing model documents and resources, including example food policies, menu templates and/or compliance checklists.
- Aligning guidance across related policy areas, including procurement, allergies and medical needs, SEND, breakfast provision, free school meals and school website requirements.
- Providing clear information on governance expectations, including the role of boards in seeking assurance and monitoring compliance.
- Sharing examples of effective practice from schools and trusts that have successfully implemented the standards.

Environmental principles

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

The updated standards are underpinned by the UK's five core environmental principles, ensuring that environmental protection is embedded in the policy framework that governing bodies are responsible for overseeing.

The standards also provide greater flexibility for schools to replace meat and poultry with pulses as a primary protein source. This creates opportunities for governing boards to support the procurement of higher-welfare, seasonal produce from British suppliers, potentially reducing the environmental impact associated with intensive livestock farming and long-distance supply chains. In addition, the framework gives catering teams greater freedom to adapt menus according to seasonal and locally available produce. Governors can reinforce these priorities through the school's whole-school food policy, helping to align food provision with broader sustainability objectives.

The standards may also contribute to a reduction in the environmental impact of school meals by limiting processed meat products and increasing the use of plant-based protein sources. Such dietary changes generally require fewer natural resources and are often associated with lower greenhouse gas emissions.

However, there are potential challenges to implementation. Supply chain constraints may make it difficult for some schools to source affordable local or sustainable products consistently. Where these options are unavailable or cost-prohibitive, schools may need to continue relying on larger, established suppliers, which could limit the environmental benefits the standards are intended to achieve during the initial stages of implementation.