

Welsh Government Integrated Impact Assessment: Healthy Eating in Schools Regulations 2025

Title of proposal:	Healthy Eating in Schools (Nutritional Standards and Requirements) (Maintained Primary Schools) (Wales) Regulations 2025 ('the 2025 Regulations')
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Integrated Impact Assessment: The Healthy Eating in Schools (Nutritional Standards and Requirements) (Maintained Primary Schools) (Wales) Regulations 2025

Introduction

1. The [Healthy Eating in Schools \(Nutritional Standards and Requirements \(Wales\) Regulations\) 2013](#) ('the 2013 Regulations') set out the types of food and drink that must and must not be provided during the school day and define the nutrient content of an average school lunch. All food provided in local authority-maintained schools must adhere to these Regulations. The Regulations, as they apply to maintained primary and nursery schools, have been reviewed to reflect the latest dietary advice.
2. This document considers the impact of the updated Healthy Eating in Schools (Nutritional Standards and Requirements) (Maintained Primary Schools) (Wales) Regulations 2025 ('the 2025 Regulations') and the associated Statutory Guidance ('the Guidance'). It presents an assessment of the overall impact (**Part 1**), including the Children's Rights Impact Assessment (**Part 2**), Equality Impact Assessment (**Part 3**) and a Health Impact Assessment (**Part 4**). The full Integrated Impact assessment is included in **Part 5 (this section will not be published)**. The Statutory Guidance will be finalised and published after laying of the Regulations (following the annulment period).
3. To note, when we refer to primary schools throughout this document, this includes both nursery and primary aged learners in maintained schools in Wales.

Part 1 – Summary Impact Assessment

What action is the Welsh Government considering and why?

Background

4. Wales leads the UK in providing Universal Primary Free School meals (UPFSM). This important offer helps tackle child poverty and hunger, supports learners to achieve, and contributes toward improved health, making a real difference in schools and communities across Wales.
5. In addition, we currently offer:
 - Free and subsidised school milk for learners in key stages 1 and 2.
 - Free breakfasts for primary pupils.
 - Free school meals for secondary pupils who need them most.
 - A paid meal service is also available in secondary schools.
6. Good health and wellbeing are important to enable successful learning. Eating a nutritious meal in school can improve learners' overall mood and energy levels, increasing their [engagement in education](#), [attendance](#) and [boosting achievement](#).
7. Further, through our school food offer, the Welsh Government is committed to strengthening health outcomes and reducing health inequalities for learners in Wales. From the [Obesity in Wales report](#), we know that currently:
 - One in four children (about 9,000) start school overweight.
 - Children living in areas of higher socio-economic disadvantage face greater rates of weight issues.
 - Many children's diets don't meet national recommendations.
8. While many factors influence children's health outcomes, evidence shows that strong [nutrition standards](#), implemented as part of a whole-school approach, can significantly improve dietary habits. School meals can make up a third or more of a child's weekday food intake. Therefore, strengthening our school food regulations offers us a vital opportunity toward ensuring school food shapes lifelong healthy eating behaviours and improves health and education outcomes.
9. [Wales Centre for Public Policy research](#) supports our understanding of the benefits school meals can deliver, including that they can:
 - Raise educational achievement.
 - Help develop healthy eating habits and reduce health inequalities.
 - Address child hunger and poverty.
 - Improve family finances.

10. Between May-July 2025 the Welsh Government held a consultation on proposed amended Regulations and Guidance for maintained nursery and primary schools. This set out proposed changes to which food and drinks can be offered in schools. Having considered the evidence from this exercise the 2025 Regulations have been laid in the Senedd Cymru and will seek to come into force in October 2026.
11. Separately, and outside the scope of the 2025 Regulations and the Guidance, and therefore this impact assessment, the consultation considered changes to Chapter 1 of the Guidance regarding the responsibility for promoting healthy eating in primary and secondary schools. It also sought to gather evidence on the food landscape within secondary schools to better inform any changes to Regulations for this age group in the future.
12. The 2013 Regulations will continue to apply to secondary schools in the meantime. However, the 2025 Regulations do seek to address spelling and technical amendments to the 2013 Regulations as they apply to secondary schools. This does not alter the underlying policy.

Policy Objective

13. As set-out below, the five ways of working within the Well-being of Future Generations (Wales) Act 2015, have been applied in the development of the 2025 Regulations.
14. Since the introduction of the 2013 Regulations, the UK Government's dietary recommendations have been revised following updated advice from the Scientific Advisory Committee on Nutrition (SACN) to the four UK Governments. Without action to consider this advice, the Welsh Government will not be maximising the impact that the school food provision can have to reduce inequalities and support the development of lifelong good eating habits in the **longer term**.
15. The aim of the 2025 Regulations, which are based on the latest UK government dietary recommendations, as mentioned above, is to enable primary learners to access healthy food during school hours, aiding the development of healthy eating habits.
16. The 2025 Regulations are therefore a **preventative** step to help ensure primary learners have access to more nutritious school food which could help to reduce the risk of diet-related health problems such as obesity, cancer, coronary heart disease and type 2 diabetes,
17. The 2025 Regulations will apply to maintained primary schools nationally, ensuring that school food providers across all local authority areas will:
 - Offer more fruit and vegetables to help Welsh children get their five-a-day.
 - Increase provision of fibre by ensuring starchy carbs are served every day with three varieties each week, with at least one portion of these being pasta, noodles or rice that contain at least 50% wholegrain, as evidence suggests Welsh children aren't getting enough fibre.
 - Limit pastry, sweetened baked goods and desserts, and fried foods based on the latest dietary advice.
 - Reduce processed meat and limit some processed alternatives to fish and meat, which can be high in salt and saturated fat.
 - Retain red meat in moderation to ensure children benefit from the nutrients it provides without overconsumption.
 - Prohibit sugary drinks, which are linked to obesity and tooth decay.
18. While many factors influence children's health outcomes, evidence shows that strong food requirements and nutritional standards, implemented as part of a whole-school approach, can significantly improve dietary habits. Strengthening these standards is a vital step toward ensuring school food **impacts** lifelong healthy eating behaviours and improves health and education outcomes.
19. Separately, updating the current regulations **integrates** with a range of Welsh Government strategies and UK-wide legislation. It fulfils the Welsh Government's commitment made in the [Healthy Weight: Healthy Wales Strategy](#) to bring forward the '*implementation of revised school food regulations*' which are in line

with the latest requirements and guidelines. This is part of a national priority to enable our education settings to be places where physical and mental health remains a priority to ‘*reduce the impact of poor health and inequality.*’

20. In addition, the 2025 Regulations:

- Support objectives set out in the *Child Poverty Strategy for Wales 2024* and the *Children and Families (Wales) Measure 2010* by helping reduce food insecurity and health inequalities for children living in socio-economic disadvantage.
- Uphold children’s rights under the *UNCRC*, with a full Children’s Rights Impact Assessment available at Annex 1.
- Align with the *Equality Act 2010* by ensuring inclusive access to school meals with reasonable adjustments considered.
- Support the Well-being of Future Generations (Wales) Act 2015 by contributing to ‘A More Equal Wales’ and ‘A Healthier Wales’.

21. Our updated approach has been co-developed in **collaboration** with and with the **involvement** of children and young people, parents, schools, governing bodies, local authority caterers, the Welsh Local Government Association (WLGA), dietitians, public health, Estyn and academics, and aims to:

- Help all children access the food they need for a healthy diet, including those with special or medical dietary needs.
- Provide age-appropriate portion sizes to reduce food waste.
- Support schools, caterers and partners to put these new requirements into practice.
- Support continued opportunities for the Welsh food supply chain.
- Balance healthier food with maintaining school favourites.
- Make it clear who is responsible for promoting healthy eating and drinking in schools and support them to fulfil this duty.

22. The 2013 Regulations for maintained primary schools will be replaced with updated 2025 Regulations under the Healthy Eating in Schools (Wales) Measure 2009. Section 4 of the Explanatory Memorandum, that accompanies the 2025 Regulations, further set outs the case for change. This includes the Regulatory Impact Assessment (RIA), which assesses the cost benefit analysis.

CONCLUSION

How have people most likely to have been affected by the proposal been involved in developing it?

23. As outlined in paragraph 21, in line with our duty to involve stakeholders, and adopting the principles of the Well-being of Future Generations (Wales) Act 2015, extensive engagement was undertaken to inform the development of the 2025 Regulations.

24. Ahead of the consultation, expert groups were established through a Task and Finish approach with a range of partners. Considering a suite of evidence, the

groups assessed whether the current Regulations and Guidance for maintained nursery and primary schools were fit for purpose. This included engagement via focus groups with learners, and a pre-consultation testing and reflection phase for local authorities and governing bodies - allowing for trialling of approaches and further refinement of proposals prior to wider testing through public consultation.

25. Following consideration of the available evidence, including that which was gathered through the Task and Finish approaches, a set of proposals were developed and tested at public consultation between May and July 2025. The proposals were presented in a range of formats alongside supporting information and draft assessments of impact in a range of areas. Learners were engaged through a child friendly version of the consultation, questionnaires and focus groups. Focus groups were also used to support further, focused engagement with parents and carers. Separate events were held with local authorities and suppliers.
26. The findings of the consultation have been considered, and where necessary revisions re-tested with the task and finish groups as to present a final version of the 2025 Regulations.

What are the most significant impacts, positive and negative?

27. The 2025 Regulations are expected to deliver **significant long-term benefits** for learners, families, communities, and public services across Wales. The most substantial positive impacts relate to improved health outcomes, reduced health inequalities and enhanced educational engagement from **learners**. For learners the 2025 Regulations will ensure all primary-aged children have access to nutritionally balanced meals aligned with the latest UK dietary recommendations. This supports the development of lifelong healthy eating habits and contributes to reducing the risk of diet-related conditions such as obesity, type 2 diabetes, and cardiovascular disease. These improvements are particularly important for children living in socio-economic disadvantage, who are more likely to be disabled families, single parent families and some ethnic minority families and who are more likely to experience poor health outcomes due to dietary factors.
28. For **families**, the 2025 Regulations also support household food security and may reduce family food costs, especially where children rely on school meals as their main source of nutrition.
29. However, consultation responses highlighted potential risks, including potential reduced uptake of school meals if menus do not reflect cultural preferences, religious diets or familiar food preferences. This could disproportionately affect neurodivergent learners, disabled children, those from ethnic minority or religious backgrounds, and those from socio-economically disadvantaged backgrounds if their needs are not considered when planning implementation locally.
30. For **local authorities**, the 2025 Regulations formalise existing good practice and allow flexibility in menu design to reflect regional preferences. While some time will be required to familiarise staff with the Guidance, and some local authorities identified the potential for increased costs through their consultation returns,

many authorities are already implementing standards that align with the revised requirements and consultation responses identified opportunities for realising cost savings in delivering revised Regulations. The changes are therefore not expected to significantly disrupt business-as-usual operations and opportunities for sharing best practice ahead of the coming into force date will help mitigate risks.

31. For **suppliers**, the 2025 Regulations present opportunities to increase the use of seasonal, and sustainable produce, supporting the foundational economy and Welsh food sector. However, some suppliers raised concerns about reformulation costs and the classification of certain products (e.g. ham). These risks will be addressed through ongoing engagement with the supply chain and support from Welsh Government's Food Division.
32. From a **public health** perspective, the 2025 Regulations offer a preventative, invest to save, approach to improving population health and reducing pressure on the NHS. The **estimated** annual cost of obesity-related diseases to the NHS is £6.5 billion UK-wide, with the social cost in Wales alone reaching £3 billion. By embedding healthier behaviours early, the 2025 Regulations contribute to a healthier, more resilient population and support the goals of a 'Healthier Wales' under the Well-being of Future Generations (Wales) Act 2015.
33. In terms **of cultural and Welsh language impacts**, the 2025 Regulations promote inclusive food education and bilingual engagement. Focus groups were held in Welsh and English, and all consultation materials were issued bilingually. The proposal supports cultural well-being by encouraging diverse and traditional food options and linking food education to the curriculum.
34. **Environmental impacts** are expected to be positive, furthering opportunities to realise benefits through increased local sourcing, reduced food waste, and more plant-based options. These align with the Environment (Wales) Act 2016 and the Natural Resources Policy.
35. In summary, the 2025 Regulations are expected to have a **significant positive impact on health, education and equality**, with moderate risks that are being actively mitigated through inclusive and strengthened Guidance, which will be published in 2026, stakeholder engagement, and monitoring. The proposal aligns with multiple Welsh Government strategies, including Healthy Weight: Healthy Wales, the Child Poverty Strategy, and Cymraeg 2050, and contributes to several well-being goals, particularly 'A Healthier Wales', 'A More Equal Wales', and 'A Prosperous Wales'.

In light of the impacts identified, how will the proposal:

- **maximise contribution to our well-being objectives and the seven well-being goals; and/or,**
- **avoid, reduce or mitigate any negative impacts?**

36. As outlined in paragraph 35 above, the 2025 Regulations and supporting Guidance will contribute significantly to a "Healthier Wales and a "More Equal

Wales”.

37. **“A More Equal Wales”**: The 2025 Regulations promote equity by ensuring all primary learners, regardless of background, can access nutritious meals. They help reduce health inequalities, particularly for children in socio-economic disadvantage. Inclusive guidance on special diets and reasonable adjustments particularly supports neurodivergent learners, disabled learners, and learners from different racial or ethnic backgrounds, ensuring fair access to school food.
38. **“A Healthier Wales”**: By aligning school meals with UK dietary guidance, the 2025 Regulations improve child nutrition and reduce risks of obesity and related conditions. Measures like age-appropriate portions, increased fruit and wholegrains, and limits on sugar and saturated fat foster healthier eating habits and support physical and mental well-being.
39. The 2025 Regulations will also support the Welsh Government’s well-being objective of supporting people to live healthy active and independent lives by ensuring that children have access to nutritionally balanced food at school which will in turn support them to establish positive habits and attitudes into adulthood.
40. Several steps have been taken to avoid or mitigate potential negative impacts that are outlined in paragraph 29 above. These include:
 - Including a **dedicated section on managing special diets** in the forthcoming Guidance to support inclusive provision (particularly for those learners identified within paragraph 37).
 - Strengthening Guidance and clarifying the roles and responsibilities of those with a duty to take action to **encouraging schools and local authorities to engage with learners and families** in menu planning to reflect cultural and religious diets, and to develop menus which align to local communities.
 - Clarifying the **legal duty to make reasonable adjustments** under the Equality Act 2010 to support disabled and neurodivergent learners.
 - Introducing **age-appropriate portion sizes** to reduce food waste and ensure adequate nutrition.
 - Conducting **extensive stakeholder engagement** to test assumptions and refine proposals based on lived experience.
 - Through the Universal Primary Free School Meal grant, Welsh Government will continue to monitor take-up of the food in school offer to consider what if any further changes may be needed.
41. As referenced within paragraph 29, consultation responses highlighted concerns that some learners may opt out of school meals if menus do not reflect cultural preferences, sensory needs, or familiar food choices. To address this, the forthcoming Guidance includes a dedicated section on managing special diets and clarifies the legal duty to make reasonable adjustments. It also encourages schools and local authorities to engage with learners and families in menu planning, ensuring that the food offer is inclusive and responsive to individual needs.

How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?

42. The Welsh Government is committed to reviewing the impact of the 2025 Regulations. Well established networks with schools, local authorities, suppliers and wholesalers will offer strengthened opportunities to discuss and review implementation approaches, both in anticipation of the proposed October coming into force date and beyond it. This will provide a policy feedback loop enabling adjustments to planned or future approaches to supporting implementation. Ongoing engagement and planning will help ensure the development of mechanisms to ensure local authorities can feedback progress.
43. The Year 1 evaluation report of the Universal Primary Free School Meals (UPFSM) programme, scheduled for publication in early 2026, will provide valuable early insights into the school food system in Wales before the 2025 Regulations take effect. Data collected so far includes qualitative information on dietary behaviours, wellbeing, and perceptions of school food environments, gathered from children, families, school staff, and other stakeholders.
44. Conducting the initial phases of the UPFSM evaluation in this pre-regulation context will enable Welsh Government to explore the potential impact of upcoming changes to the 2025 Regulations. Future phases of the evaluation will continue to monitor these impacts, supporting evidence-based policy development and implementation.
45. Further, methods will be considered as part of efforts to measure and quantify the impact of this new policy. A range of opportunities may already exist that can be used to support monitoring and evaluation of any changes. These include existing education and health datasets and indicators which can be compared over time.

Children's Rights Impact Assessment

Policy objectives

46. This document **assesses the impact** on children and young people as a result of **the decision** to introduce the 2025 Regulations and the soon to be published Guidance.
47. The **aim of this approach** is to help children and young people thrive by accessing more nutritious, balanced food in school from a young age, and the development of healthy eating habits that will support them now and in the future. Through these efforts we hope to support improved education and health outcomes, reduce inequalities for children and young people, and improve the wellbeing of future generations.
48. [The Rights of Children and Young Persons \(Wales\) Measure 2011](#) places a duty on the Welsh Ministers to pay due regard to the United Nations Convention on the Rights of the Child (UNCRC) and its Optional Protocols when exercising any of their functions.

Research and evidence that has been considered

49. The **following research has been considered** in informing the review of the 2025 Regulations and forthcoming Guidance.

School Meals

50. [Wales Centre for Public Policy research](#) supports our understanding of the benefits school meals can deliver, including that they can:
- Raise educational achievement.
 - Help develop healthy eating habits and reduce health inequalities.
 - Fight child hunger and poverty.
 - Improve family finances.
51. Research also further indicates [School meal quality can support improved academic performance](#).

Obesity

52. Via the [Obesity in Wales report](#), we know that currently:
- One in four children (about 9,000) start school overweight.
 - Children living in areas of higher socio-economic disadvantage face greater rates of weight issues.
 - Many children's diets don't meet national recommendations.

UK Government dietary recommendations

53. There have been revisions to UK Government dietary recommendations since the regulations were introduced in 2013.
54. Specifically, following the [SACN Report on Carbohydrates and Health](#), there was a significant reduction in the recommended intakes of free sugars to provide no more than 5% of dietary energy. The term free sugars has replaced the term Non-Milk Extrinsic Sugars (NMES) and describes the types of sugar we eat too much of – added sugars and sugars naturally present in fruit juice and honey etc. It does not include sugar found naturally in milk, fruit and vegetables. Not reflecting this updated definition in the 2025 Regulations could lead to negative impacts on achieving appropriate energy intake to maintain a healthy weight. Additionally, it could counter efforts to reduce dental cavities in children which in turn has a [negative impact on maintaining a healthy weight, growth and quality of life](#).
55. There is strong [evidence that eating sufficient fibre is associated with a lower risk of cardio-metabolic disease](#) and colorectal cancer. Failing to align school food regulations with daily fibre recommendations risks poorer health outcomes, increasing the burden of preventable chronic diseases. To increase fibre consumption, we are proposing that schools offer 50% wholegrain bread, brown rice, and wholemeal pasta, while encouraging the use of wholemeal flour in both sweet and savoury dishes.
56. Most people in Wales [eat more saturated fat than is recommended](#). Reducing saturated fat reduces the risk of cardiovascular disease and coronary heart disease events, lowers total, LDL and HDL cholesterol and improves indicators of glycaemic control. Ensuring school food regulations restrict the availability of foods high in saturated fats will contribute to prevention of diet-related ill health and chronic diseases.
57. SACN recommendations include limiting the consumption of red and processed meat. UK Government dietary advice was revised, following the SACN review on Iron and Health, to limit red and processed meat in our diet to [no more than 70g per day as it may increase the risk of colorectal cancer](#). The beneficial nutrients provided through red meat in moderation are acknowledged in our proposals.

Children's Commissioner

58. The Children's Commissioner for Wales' office undertook a review of the existing evidence in the school food space. In particular, [the Commissioner conducted an engagement exercise](#) with children and young people around healthy eating and school dinners in March 2024. A summary of the findings is set out below:
- 490 children and young people aged between 7 and 18 answered the survey while a further 1,250 children took part in groups, with teachers and youth workers submitting a summary of their views. They also received responses from 19 local authorities.

- 51% children said they had school dinners regularly whilst 40% said sometimes. 43% said they thought school meals were healthy whilst 48% said they were sometimes healthy.
- Positive themes were identified regarding the current school lunch such as the taste of the meal and the choice available.
- Negative themes included small portion sizes, and the quality of the food provided.

Nesta

59. With the roll-out of the UPFSM offer across Wales, [Nesta identified an opportunity to help change eating habits amongst children in Wales for life](#). On average, school meals have been shown to contain less sugar, saturated fat and total calories than packed lunches. Therefore, Nesta suggested that a considerable improvement to children's diets may be made by shifting more children from eating packed lunches to eating school meals if they can be made to be appealing and appetising to learners. Nesta's work also identified the importance of trust in the school food offer, which in part is informed by understanding that the food provided is of high quality.

Evidence gathered through policy co-development

60. Building on the available evidence, expert groups were established through a Task and Finish approach with a range of partners including learners, schools, governing bodies, local authorities, WLGA, dieticians, public health, Estyn and academics. The groups assessed whether the current Regulations and Guidance for maintained nursery and primary schools were fit for purpose. This involved reflecting on evidence on what is currently being consumed and recommendations from the SACN committee and the [Eat Well Guide](#), alongside issues such as practicality, affordability, sustainability, deliverability and take-up. They also considered the current guidance that supports the promotion of healthy eating and drinking, reflecting on best practice and how roles and responsibilities could be more clearly defined.
61. Health was the key policy driver and discussions focused on aiming for the optimal wherever possible. The proposals put forward were shared in advance with catering providers, Public Health Wales and the supply chain to allow proper consideration by those who will have a key role in delivery and supporting realisation of our objectives through this work. The groups' work helped shape proposed revisions to school food requirements for public consultation and informed the drafting of supporting Guidance.

Public Consultation

62. Following consideration of the available evidence, including that which was gathered through the Task and Finish approaches, a set of proposals were developed and tested at public consultation between May and July 2025. The proposals were presented in a range of formats alongside supporting information and draft assessments of impact in a range of areas. The key proposed changes that were consulted on included:

- Offering more fruit and vegetables to help Welsh children get their five-a-day.
- Providing more wholegrains because evidence suggests Welsh children aren't getting enough fibre.
- Limiting pastry, sweetened baked goods and desserts, and fried foods based on the latest dietary advice.
- Tailoring portion sizes based on age group to help reduce food waste.
- Reducing processed meat and limits to processed alternatives to fish and meat which can be high in salt and saturated fat.
- Retaining red meat in moderation to ensure children enjoy its nutritional benefits without overconsumption.
- Prohibiting sugary drinks, which are linked to obesity and tooth decay.

63. The public consultation documents included children and young people versions and were supported by focused engagement with learners. More detail on these elements follows in the next section.

Participatory work with children and young people

64. The **following participatory work with children and young people has been used** to inform the review of the 2025 Regulations and forthcoming Guidance.

Participatory work with Children and Young People prior to the consultation

65. Children in Wales were commissioned by the Welsh Government in 2024 to conduct focus group sessions in primary schools as part of the policy development process and prior to proposals being tested at public consultation. Focus groups with primary learners were held in two schools, one in Flintshire and one in Ceredigion. Children's perspectives on school meals were central to the engagement, exploring their preferences, perceptions of quality, portion sizes, food presentation, and the nutritional balance of their meals. Through a series of engaging, child-centred activities, data was collected to gain an understanding of how children experience school food and where improvements could be made.

66. The findings indicated that while the quality of school meals was generally rated well, there were concerns regarding lack of choice, inconsistent portion sizes, and the availability of fruit and vegetables. Children's preference for familiar, comforting foods was evident, but there was also interest in expanding the menu to include a greater variety of options. Children in Wales suggested several improvements - increasing meal variety; standardising portion sizes; enhancing nutritional offerings, managing food waste more transparently and revisiting special diet requests. These recommendations were considered and informed the design of further engagement with children during the public consultation.

67. In addition to these sessions, participating local authorities were encouraged to account for the views of children and young people in taking forward the development of proposals through Task and Finish approaches. Further, they were encouraged to undertake their own engagement with children and young

people following the sharing of the proposed Regulations in September 2024 as part of a pre-consultation testing and reflection period.

Participatory work with Children and Young People during public consultation

68. Between May and July 2025, the Welsh Government publicly consulted on proposals to update the 2025 Regulations and Guidance. This consultation was open to all children and young people. An easy read version and a children / youth friendly version of the consultation document in plain English and Welsh was prepared to support this engagement. British Sign Language materials were also produced. Marketing and communications activity supported the sharing of key messages as part of efforts to raise awareness and secure engagement. 2,570 responses were submitted to the main consultation, 38% of which were provided by children and young people. A further 53 responses were received via the children and young people focused consultation materials.

69. Alongside the consultation, the Welsh Government engaged specifically with children and young people through a range of online and in person focus groups. Ten focus groups with learners were held with 152 learners in total from the following schools:

- St. Mary's Catholic School, Wrexham.
- St. David's Catholic School, Swansea.
- Ysgol Llanfihangel y Creuddyn, Ceredigion.
- Awel y Mor Primary School, Port Talbot.
- Clwyd Primary School, Swansea.
- Ysgol Gynradd Gymraeg Rhosafan, Port Talbot.
- Cadoxton Primary School, Vale of Glamorgan.
- Ysgol Gyfun Cwm Rhondda, Rhondda Cynon Taf.
- Lliswerry High School, Newport.

70. The aim was to gather feedback on the proposed changes from a wide range of demographics of children (parents/carers were also engaged via separate focus groups). The focus groups prioritised deep engagement with children and young people from across different communities and protected characteristics, to better understand dietary needs and preferences in specific contexts. This was designed to add value to the consultation exercise, providing reflections on unintended consequences for relevant stakeholders. Focus groups were conducted in both Welsh and English and included neurodiverse learners and learners who require special diets.

Analysing the evidence and assessing the impact on children and young people

71. Research and evidence, alongside participatory work with children and young people has informed the following **analysis and assessment of impact on children and young people**. This also sets out how we anticipate the decision to update the 2025 Regulations and soon to be published Guidance will **affect**

different groups of children and young people, both positively and negatively, and our proposed action to mitigate or reduce any negative effects.

72. Welsh Government **considered the available evidence**, set out above, when conducting the policy work to review the 2025 Regulations and Guidance. To support this work, the Food and Nutritional Task and Finish Group was established, which included a range of partners (Public Health Wales, public health dietitians, WLGA, local authority catering leads, nutrition academics) – they were tasked with proposing revisions to the current Regulations and Guidance for primary schools based on UK dietary recommendations, including SACN committee recommendations and the Eat Well Guide. These health recommendations were carefully considered and balanced alongside issues such as practicality, affordability, deliverability and take-up (based on an understanding of learner preference and existing levels of take up of menu items).
73. The group specifically factored in the potential impact any proposals may have on the take-up of school food amongst those that were eligible for free school meals, many of whom are from protected groups. It was widely recognised that changing the school food offer too radically too quickly could see the introduction of foods that many learners are not used to eating and that a reduction in take up of free school meals would not deliver the intended policy intent of ensuring learners get a free, nutritious meal at school, potentially impacting negatively on the learner's long term health as well as on their family's finances (requiring the family to pay for and bring in a packed lunch).
74. Health was the key policy driver and discussions focused on aiming for the optimal wherever possible. The proposals put forward were shared in advance with catering providers to allow them time to pilot where feasible and gather learner feedback on potential changes that were likely to be introduced (some of this feedback was reflected in local authority consultation responses). The proposals were also shared with Public Health Wales and the supply chain to allow proper consideration by those who will have a key role in delivery and supporting realisation of our objectives through this work. This included a period for pre-consultation testing for Local Authorities.
75. While the focus was on achieving the greatest health outcomes, the groups also considered the deliverability and uptake of a future food in schools offer, as well as how this might impact on the sustainability and viability of school food services in Wales. In some instances, food waste, reduction in take-up of school food on certain days and the impact on the viability of the catering service were considered. The group's work helped shape proposed revisions to school food requirements for public consultation (May to July 2025) and informed the drafting of supporting Guidance.
76. The published [summary of consultation responses](#) identified over a third of the responses to the consultation (38.1%) were from children and young people (19.4% primary 18.7% secondary). Overall, there was broad support for the majority of proposals, including from children themselves and their parents. Therefore, many of the provisions remain unchanged, these include:

- The increase of portions and variety of fruit and vegetables.
- One portion of starchy carbohydrates containing minimum of 50% wholegrain weekly.
- All bread being at least 50% wholegrain.
- Fish provided at least once a week and oily fish every four weeks.
- Red meat at least once a week, but no more than twice.
- Potato or potato products no more than twice a week.
- Deep fried or flash fried food no more than once a week.
- Pastry or products containing pastry no more than once a week.
- Only plain water, plain milk and plain plant-based drinks to be provided.

77. However, several amendments to the proposals consulted on have been made. The following have been amended with the feedback from children and young people in mind. This feedback highlighted the confusion over certain provisions, and we have made amendments to reflect this:

- We have mandated starchy carbohydrates to be provided each day with three different varieties each week because this helps children and young people understand that all meals should be based around starchy carbohydrates.
- We have introduced clearer definitions of what is red meat and what is processed meat to ensure primary learners are not overconsuming, based on public health guidance.
- We will be exempting mycoprotein, pea protein and soya mince, pieces and chunks from the definition of processed alternatives to meat and fish because children and young people highlighted that these were familiar items for non-meat eating learners.
- We have introduced a new 'Beans and Pulses' provision to replace the cheese-based meal provision because children and young people highlighted that the proposal was confusing and that cheese is a popular choice.

78. Through our understanding of the evidence gathered the main **positive impacts** on children and young people of the 2025 Regulations and soon to be published Guidance will be:

- **Health:** Offering all primary learners a healthy, nutritious meal every day will have long-term health benefits, which will support our efforts to tackle health inequalities and play an important role supporting all learners to reach their full potential.
- **Behaviour and Attainment:** Good health and wellbeing are important to enable successful learning and eating a nutritious meal in school can improve learners' overall mood, and energy levels increasing their engagement in education, attendance and boosting achievement. Raising the profile of healthy eating across the whole school and opportunities to share healthy food together can help improve social skills and wellbeing at mealtimes.

- **Alignment to our Future Generation aspirations:** Creating an opportunity for all primary learners to share and enjoy a healthy, nutritionally balanced meal together. We hope to maximise the benefits of our investment in children's health and wellbeing, learning, and in their social skills for future generations.

79. We know that children spend a significant proportion of their daily lives in school and the food they are provided can contribute over a third of their daily requirements. Evidence indicates that when meals are backed up by nutritional requirements, this has been beneficial to [educational outcomes](#). Evidence also indicates the benefits of nutritional requirements in school food on health outcomes. Ensuring that the food provided in schools contributes towards improved outcomes for learners represents better value for money to the public purse.
80. [Evidence](#) also shows that children living in areas of higher socio-economic disadvantage face higher rates of weight issues. Updating the 2025 Regulations, accompanied by strengthened soon to be published Guidance, therefore represents an effective method for helping equitable access to healthier food as well as supporting the development of healthy eating behaviours and food choices that can contribute toward improved outcomes and quality of life for children and young people living in Wales.
81. Furthermore, the Guidance, published alongside the 2025 Regulations, will reinforce expectations on how local authorities and schools should meaningfully engage with primary learners in the design and delivery of the school lunch offer. This includes ensuring that the offer better reflects the diverse needs of learners and sub-groups, particularly in relation to special dietary requirements and cultural preferences.
82. There are significant positive impacts from changes to school meals so that they are nutritionally balanced and reflect the latest UK Government dietary recommendations. This will potentially have long-term impacts on primary learners and their families, for example, through preventing health inequalities and improving educational engagement.
83. There are potential **negative impacts**, where the changes could limit the availability of what we know from the consultation to be popular food choices such as processed meat and sweetened desserts. This could potentially increase child hunger if primary learners do not choose to eat what is offered in the future. This could have a particular impact on children living in socio-economic disadvantage, who are also more likely to be from some ethnic minorities and from families with disabled people, as these children may be more reliant on the meal in school.
84. There is also a potential negative impact on primary learners that are neurodivergent, disabled, have ALN, some ethnic minority children, some children with religious beliefs and children living in socio-economic disadvantage who might not have their needs considered within new menu design and

therefore become more likely to not take up the offer of a free meal. Some of these children are also more likely to be living in socio-economic disadvantage so it could have a disproportionate impact on their access to food. This risk, however, also exists under the status quo prior to the introduction of 2025 Regulations.

85. These impacts will be mitigated through existing practice, where caterers design menus with the needs and preferences of primary learners and local communities in mind. But also, through providing clarity in the soon to be published Guidance on how schools and local authorities should continue to strengthen work with primary learners and their families to develop inclusive menus and consider any further support or adjustments in relation to accessing the school food provision.
86. Separately the inclusion of a dedicated section on the management of special diets in the draft Guidance was welcomed, noting that it provides important legal clarity by distinguishing between the duty to make reasonable adjustments for disabled primary learners and those with broader healthcare needs. Paragraphs 102- 104 within the Equality Impact Assessment contains further information on this point.

How the proposal enhances or challenges children's rights

87. This section identifies how the proposed introduction of updated Regulations **enhances or challenges children's rights**, as stipulated by the UNCRC articles and its Optional Protocols.
88. Overall, the 2025 Regulations and soon to be published Guidance could have a significant positive effect enhancing children's rights, in particular:
- **Article 3** (Best interests of the child) All organisations concerned with children should work towards what is best for each child. This policy proposal seeks to create an opportunity for all primary learners to share, enjoy and benefit from a healthy, nutritionally balanced meal eaten together.
 - **Article 6** (life, survival and development) Every child has the right to life. Governments must do all they can to ensure that children survive and develop to their full potential. This policy proposal will increase access to healthy food for primary learners which will improve child development and contribute towards them achieving their full potential.
 - **Article 24** (health and health services) Every child has the right to the best possible health. Governments must provide good quality health care, clean water, nutritious food, and a clean environment and education on health and well-being so that children can stay healthy. This policy proposal will directly increase primary learners access to nutritious food and education on health and wellbeing.
 - **Article 27** (adequate standard of living) Every child has the right to a standard of living that is good enough to meet their physical and social

needs and support their development. Governments must help families who cannot afford to provide this. This policy is part of a programme of food in schools which increases access to food for families who cannot afford it and improves the standard of food to support child development for all primary learners.

89. There are also potential negative impacts, these could limit the availability of what we know from the consultation to be popular food choices such as processed meat and sweetened desserts. As such, there exists a potential **conflict of rights** if **Article 13** (right to freedom of expression) is interpreted in a way which considers that the new food requirements could limit a child's choice to certain food provisions. However, on balance, ensuring that the food offer in primary schools reflects the latest health recommendations enhances children's rights overall rather than diminishes them. Should this aspect of the proposal increase child hunger, if primary learners do not choose to eat what is offered in the future, there could be a negative impact on the rights referenced above. This could have a particular impact on children living in socio-economic disadvantage, who are also more likely to be from some ethnic minorities and from families with disabled people, as these children may be more reliant on the meal in school.
90. These impacts will be mitigated through providing clarity in the forthcoming Guidance on how schools and local authorities should work with primary learners and their families to develop inclusive menus and consider any further support or adjustments in relation to accessing the school food provision. Careful approaches to implementation can also further mitigate these risks by communicating with and engaging primary learners and their families, familiarising them with new/proposed food and menu items over time.
91. On balance, ensuring that the food offer in primary schools reflects the latest health recommendations enhances children's rights rather than diminishes them.

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
Article 1 (definition of the child) Everyone under the age of 18 has all the rights in the Convention	x	x	<p>The review of food requirements and nutritional standards initially applies only to primary learners so enhances rights for children aged 3-11.</p> <p>Not updating the Regulations and Guidance for Secondary Schools could lead to inequity of provision between the school phases with older learners (ages 11-18) not being able to access a school meal which reflects the latest UK Government dietary recommendations.</p>

			However, proposals to gather more data and engage more closely with Secondary learners before introducing Regulations for this phase of education will strengthen any proposals introduced at a later date.
Article 2 (non-discrimination) The Convention applies to every child without discrimination, whatever their ethnicity, gender, religion, language, abilities or any other status, whatever they think or say, whatever their family background	x		<p>If new menus are designed without consideration of the needs of disabled children, children from some ethnic minorities and with some religious groups there is a risk that this right could be challenged</p> <p>However, the revised soon to be published guidance promotes an inclusive approach and addresses perceived issues around adjustments to meet a learner's dietary requirement because of their race, religion or cultural beliefs, therefore supporting primary learner's rights not to be discriminated.</p>
Article 3 All organisations concerned with children should work towards what is best for each child.	x		The 2025 Regulations will bring both food requirements and nutritional standards for primary learners closer aligned to the latest scientific and dietary guidelines. The soon to be published Guidance will outline how organisations can enhance the way they work together and their roles towards improving access to healthy food for children.
Article 6 All children have the right of life. Governments should ensure that children survive and develop healthily	x		Updating the Regulations and Guidance is likely to have a positive impact on the health, development, and wellbeing for primary learners who will be offered a nutritionally balanced meal which reflects the latest UK Government Dietary recommendations.

Article 12 (respect for the views of the child) Every child has the right to express their views, feelings and wishes in all matters affecting them, and to have their views considered and taken seriously. This right applies at all times, for example during immigration proceedings, housing decisions or the child's day-to-day home life	x		<p>Primary learners have been specifically consulted on these revised food requirements and nutritional standards. There was also an easy read and children and young people version of the consultation document and targeted engagement activity for learners.</p> <p>Secondary school children also had the opportunity to respond to the call for evidence during the consultation. Additionally, Children in Wales have been carrying out engagement with both primary school and secondary school children to identify their views and needs.</p>
Article 13 (freedom of expression) Every child must be free to express their thoughts and opinions and to access all kinds of information, as long as it is within the law.	x	x	<p>Although children have been provided an opportunity to have their say on the Regulations which set out the food and drink to be provided in primary schools, learners in these settings will not be free to pick certain food products that were previously available and which are now limited or withdrawn from the school meal offer. This could be perceived as impacting on their right to freedom of expression and choice.</p>
Article 14 (freedom of thought, belief and religion) Every child has the right to think and believe what they choose and also to practise their religion, as long as they are not stopping other people from enjoying their rights. Governments must respect the rights and responsibilities of parents to guide their child as they grow up.	x		<p>There is a small risk that primary learners could be negatively impacted if the local authority or school is unable to meet their specific needs or does not consider them within menu design meaning that some ethnic minority children, disabled children and children from socio-economic disadvantage are less likely to take up the offer of a free meal and reduce access to healthy food.</p> <p>However, the revised soon to be published guidance will support primary learner's rights not to be discriminated by providing clarity to local authorities/schools that they</p>

			<p>should work with learners and parents to design menus that respond to the needs and consumption habits of their local community.</p> <p>It will also seek to address when food and drink can be adjusted to meet the needs of primary learners with a dietary requirement because of their race, religion or cultural beliefs.</p>
Article 15 (freedom of association) Every child has the right to meet with other children and to join groups and organisations, as long as this does not stop other people from enjoying their rights	x		Schools, school governors and caterers strive to provide optimum environments for children to meet and socialise with other children.
Article 17 (access to information from the media) Every child has the right to reliable information from a variety of sources, and governments should encourage the media to provide information that children can understand. Governments must help protect children from materials that could harm them.	x		Through the curriculum and the whole school approach to healthy eating and drinking, those involved in the school food system, as well as primary learners, will be encouraged to source information on healthy eating that will help inform their development. This is further highlighted within the Guidance.
Article 24 Children have the right to good quality healthcare and to clean water, nutritious food and a clean environment so they will stay healthy.	x		Updating the Regulations and Guidance is likely to have a direct positive impact on a child's access to nutritious food, improving the health and wellbeing of primary school children. Nutritionally balanced meals will reflect the latest UK Government Dietary recommendations.

Article 27 Children have a right to a standard of living that is good enough to meet their physical and mental needs.	x		As in Article 24.
Article 28 Education should develop each child's personality and talents to the full. It should teach children to respect their parents, their own and other cultures and the environment	x		By linking food offered in school to the curriculum (a whole school approach to food) primary learners may be taught about healthy living; locally sourced food and engagement with the local supply chain in schools will support learning about the local and global environment. Further, encouraging the primary learner's voice to be heard in relation to school menus and dining room environments will help to develop a deeper connection with food and their own and others food cultures. This is an expression of the whole school approach.
Article 29 Children's education should help them fully develop their personalities, talents and abilities. It should teach them to understand their own rights, and to respect other people's rights, cultures and differences. It should help them to live peacefully and protect the environment.	x		As in Article 28.

Communicating with Children and Young People

92. Children and young people will be informed of the outcome of this decision, bilingually, via multiple avenues. This will include:

- Publication of the summary of responses to consultation and focused engagement with children and young people.

- Publication of final Regulations, Guidance and supporting documentation.
- Communication of key messages and circulation of relevant materials by local authorities and education settings.
- Local and school level communication and learning as part of the duty to take action to promote healthy eating and drinking in schools.
- Local and school level communication and engagement during the development and introduction of new menus in the context of updated Regulations and Guidance.

Monitoring and Review

93. Paragraphs 42-45 in **Section 1** outlines our proposed approach to monitoring and review of this policy.
94. It is proposed that 2025 Regulations will come into force in October 2026. The Welsh Government is committed to reviewing the impact of these proposed Regulations. Well established networks with schools, local authorities, suppliers and wholesalers will offer strengthened opportunities to discuss and review implementation approaches, both in anticipation of the proposed October coming into force date and beyond it. This will provide a policy feedback loop supporting adjustments to planned or future approaches to supporting implementation. Ongoing engagement and planning will help ensure the development of mechanisms to ensure local authorities can feedback progress.
95. Further, methods of monitoring and evaluation will be considered as part of efforts to measure and quantify the impact of this new policy over time. A range of opportunities may already exist that can be used to support monitoring and evaluation of any changes. These include existing education and health datasets and indicators which can be compared over time, the independent evaluation of the universal primary free school meals commitment, data on public procurement, market insight, engagement and social listening.
96. Welsh Government will consider whether the identified impacts come to fruition and whether there are unintended consequences. This Children's Rights Impact Assessment will be updated and re-published as appropriate, reflecting any new or emerging findings.

Equality Impact Assessment

Policy objective

97. The Equality Act 2010 places a General Equality Duty on Welsh Ministers to have 'due regard' to a range of requirements which relate to removing or minimising disadvantages for people with or who share protected characteristics and to remove barriers to participation.
98. This document **assesses the impact on people with protected characteristics as described in the Equality Act 2010** because of **the decision** to introduce the 2025 Regulations and the soon to be published Guidance.
99. The **aim of this approach** is to help all primary learners thrive by accessing more nutritious, balanced food in school from a young age, and the development of healthy eating habits that will support them now and in the future. Through these efforts we hope to support improved education and health outcomes, reduce inequalities for children and young people, and improve the wellbeing of future generations.
100. When considering each of the protected characteristics, this Equality Impact Assessment interconnects with several considerations examined in the Children's Rights Impact Assessment above. Therefore, it is recommended they are read alongside each other.

Research and evidence that has been considered

101. A wide range of evidence, as set out within the Summary Impact Assessment and Children's Rights Impact Assessment has been considered in developing policy and has informed the analysis within this Equality Impact Assessment. It is not repeated here. However, additional evidence, research, and ways of working, not quoted elsewhere, has also directly informed our understanding of the impact of the 2025 Regulations and forthcoming Guidance on people with protected characteristics as described in the Equality Act 2010. It is summarised below.

Special Diets

102. In addition to the work carried out by the **Food and Nutrition** Task and Finish Group, a **Special Diets** in Schools Task and Finish group was also established to provide clarity on the delivery of medically prescribed diets, additional dining needs, lifestyle diets (including vegetarian and vegan diets), and the provision of food in special schools, PRUs and EOTAS settings. Part of their role, as with all of the Task and Finish approaches, included giving consideration to primary learners with or who share protected characteristics and how to remove barriers to participation.
103. The group was tasked with identifying the user journey i.e. how a primary learner goes from first identifying a potential medically prescribed diet or special diet to receiving an appropriate provision at school. It sought to understand

opportunities to strengthen the guidance to provide clarity on roles and responsibilities and when an alternative provision should be offered.

104. Collectively the Task and Finish Groups helped shape proposed revisions to the 2025 Regulations and supporting Guidance published for consultation. The key proposed changes to the 2025 Regulations that were consulted on are outlined above in paragraph 62.
105. In addition to this, the draft Guidance sought to include more clarity around the inter-relationship between different legislative instruments (including the Equality Act) that could support the provision of school food for those with medically prescribed diets or special diets (including religious (faith or belief) or lifestyle diets) and explains how menu adjustments can be accommodated for those with medical, sensory or additional dining needs.

Engagement with relevant groups during the consultation

106. The Welsh Government held a public consultation to hear views on the proposed changes to the 2025 Regulations and Guidance. Details of the approach are set out within the Children's Rights Impact Assessment and consultation materials can be found at [Healthy eating in schools | GOV.WALES](#) (including a draft Equality Impact Assessment developed and published ahead of public consultation).
107. The consultation sought to understand the lived experiences of learners, including those within any vulnerable groups or with protected characteristics. To achieve this Welsh Government promoted participation with the consultation and sought views. It also engaged children and young people, and parents and carers, through a range of online and in person focus groups. The aim was to gather feedback on the proposed changes from a wide range of demographics.
108. The findings from focus groups held with parents and carers of those with protected characteristics are summarised below:

- **Parents from low-income families**

In this assessment, parents from low-income households are used as a proxy for learners with protected characteristics, particularly those who are more likely to experience socio-economic disadvantage and intersecting inequalities - such as children from ethnic minority backgrounds, disabled learners, single parent households and those with additional learning needs. This approach reflects the disproportionate representation of these groups among those eligible for free school meals and helps to identify potential barriers and impacts more effectively.

Parents from low-income families were generally supportive of the proposed changes when presented with them in full, recognising the importance of offering a greater variety of new, healthy food options in schools to enable children to try new things.

- **Parents of neurodivergent children**

Parents of neurodivergent children were supportive of the proposed changes in theory, with the feeling that it is a step in the right direction for the wider population of learners. The proposals surrounding fruit and vegetable provision were especially welcomed, as it was felt that an increase in portions and variety was positive. However, several participants expressed concerns that there was insufficient consideration on the impact of the changes on neurodivergent learners. Specifically, there was worry that their children would not eat the healthier alternatives proposed, due to reasons of taste and texture. Particularly for children with other sensory needs.

In these instances, it was felt that a limited offering of slightly more unhealthy options would be appropriate, as it was deemed better for their child to eat something, as opposed to nothing at all. Despite this, parents also recognised the challenges in providing a tailored offering

- **Parents from varied cultural and religious backgrounds**

Parents from varied cultural and religious backgrounds were strongly supportive of the proposed changes. The group was particularly positive about the prospect of more diversity in meal offerings, meaning that children are eating a wider range of fruits and vegetables, on the condition that the overall protein content of meals would still be balanced. There was, however, a perception amongst some that a reduction in carbohydrates (in favour of vegetables) could lead to learners leaving more of their meals and an increase in food waste. It should be noted that carbohydrates will not be reduced in any meaningful way in the 2025 Regulations for junior learners.

Consultation feedback on the Special Diets Statutory Guidance and the integrated impact assessments

109. The revised guidance was broadly welcomed for its clarity and strengthened focus on equity, particularly in relation to learners with disabilities, religious dietary needs, and those from ethnic minority backgrounds.
110. Respondents appreciated the inclusion of clearer expectations around medically prescribed diets and reasonable adjustments, which support compliance with the Equality Act 2010.
111. The guidance was seen as a step forward in promoting inclusive access to school meals, especially for primary learners who may otherwise be excluded due to dietary restrictions or cultural preferences.
112. However, some respondents expressed concern that menu design may not adequately reflect the consumption habits of ethnic minority groups, potentially leading to lower uptake of school meals among these learners. There were also worries that religious dietary requirements (e.g. Halal, Kosher) may not be consistently accommodated, which could result in indirect discrimination. Several responses highlighted the risk of neurodivergent learners being negatively affected by changes in food texture, presentation, or unfamiliar ingredients, especially in relation to wholegrain products.

113. Socio-economic disadvantage was flagged as a compounding factor—if primary learners from disadvantaged ethnic minority backgrounds do not take up the school meal offer, this could exacerbate food insecurity.

Our understanding of the cohort affected by the proposal

114. Data from the Pupil Level Annual School Census allows us to better understand the cohort affected by the introduction of the 2025 Regulations and soon to be published Guidance. While not identifying all primary learners with protected characteristics, evidence shows that learners with a protected characteristic/s are more likely to be living in low-income households therefore the data supports us to identify certain groups.

Pupil Level data by Wales for 2025 (pupils aged 5 to 10 in Reception and Years 1 to 6)

Source: Pupil Level Annual School Census (PLASC)

*The pupils eligible for free school meals include those transitionally protected

Characteristic	Number of pupils	Number of eFSM pupils	% eligible for FSM	% of all eFSM pupils (58,789) with the characteristic	% of those with the characteristic and are eFSM of the whole school population (202,383)	% of pupils with the characteristic of the whole school population
ALN/SEN	20,481	9,308	45.4	15.8	4.6	10.1
BAME	31,958	9,345	29.2	15.9	4.6	15.8
GRT	907	628	69.2	1.1	0.3	0.4
Mixed	8,715	2,788	32.0	4.7	1.4	4.3
Asian	6,960	1,105	15.9	1.9	0.5	3.4
Black	4,322	1,211	28.0	2.1	0.6	2.1
Female	99,108	28,957	29.2	49.3	14.3	49.0
Male	103,275	29,832	28.9	50.7	14.7	51.0

What are the possible negative impacts on people in protected groups and those living in low income households and how will you mitigate for these?

115. This section considers the potential negative impacts of the key proposed changes on primary learners with protected characteristics. Our assessment identifies that the 2025 Regulations and soon to be published Guidance are unlikely to have a significantly negative impact on people with protected characteristics. Where negative impacts have been identified, efforts to mitigate or minimise them are also identified.

116. In considering the protected characteristics, we note that the protected characteristics listed along with other considerations are not independent of each other, and some people may have to deal with complex and interconnected issues related to disadvantage at any one time.

Sex /Gender

Data: Female -This group represents slightly less than half of the primary school population (49%). **Male** - This group represents slightly more than half of the school population (51%).

117. Evidence shows that rates of overweight or obesity are generally higher in boys than in girls. Due to these differing rates of overweight or obesity, the 2025 Regulations and associated forthcoming Guidance is likely to have a very slightly more positive effect on males. There is also evidence that shows that Women are more likely to experience eating problems or disorders than men – Eating disorders such as anorexia nervosa and bulimia usually start in the teenage years, but eating problems—like restrictive eating, body dissatisfaction, or anxiety around food—can begin earlier, including during primary school.

118. The 2025 Regulations and supporting forthcoming Guidance aim to ensure that the provision of school food is balanced for both male and female learners and, through strengthened guidance which supports the wider work around whole school approach and food education, it is hoped that primary learners will be supported to develop positive attitudes towards eating a balanced diet. The Welsh Government have implemented several programmes to target eating disorders, focusing on early intervention and improving access to care. These include expansion of peer support services through Specialist Eating Disorders Service and the introduction of the first ‘First Episode and Rapid Early Intervention in Eating Disorders model’.

119. It is anticipated that encouraging and providing a healthy diet from an early age can help support better relationships with food, irrespective of sex or gender. To mitigate any negative impact of the 2025 Regulations, we will continue to monitor school food take-up in primary schools.

Age

Data: All children (202,383) included within this assessment were aged between 5 and 10 years of age at 31 August 2024.

120. **Evidence** demonstrates that over 1 in 4 children are starting school overweight or with obesity in Wales. Revising the 2025 Regulations and Guidance as per the commitment set out in the Welsh Government’s Healthy Weight: Healthy Wales Strategy presents an opportunity to offer a nutritionally balanced school meal, building healthier dietary habits early in life to take into adulthood.

121. Updating the 2025 Regulations and soon to be published Guidance is likely to have a significant positive impact on the health and wellbeing of all primary learners -offering a nutritionally balanced meal which reflects the latest UK Government Dietary recommendations.
122. Evidence indicates that [nutrition standards](#), as part of a whole school approach to food can have a positive impact on the consumption of healthy food and beverages whilst learners are in school and in building healthier dietary habits to take into adulthood.
123. The 2025 Regulations and forthcoming Guidance introduce two separate portion sizes based on an average requirement for juniors and infants - this is aimed at ensuring primary learners get more appropriate portion sizes according to their age range to avoid overconsumption amongst younger learners. This will have a positive impact across all age groups on improving health outcomes, including those in groups with protected characteristics, ensuring that learners have approximately 30% of their daily nutritional requirements at lunch time, and 20% at breakfast and are not overconsuming
124. There may be a slight risk that some primary learners may not take up the food offer because of the choice and type of meals offered and their willingness to try new/different foods. This could be especially relevant for those with additional learning needs, ethnic minorities or those from social economically deprived backgrounds (more detail is provided on these individual instances in the relevant groups of learners in turn below).
125. To mitigate this risk, Welsh Government will continue working closely with our key delivery partners to support and monitor implementation and further enable us to understand and mitigate emerging inequalities as they are identified
126. These Regulations will work alongside other pre-school interventions aimed at reducing obesity and overweight levels amongst learners starting primary school including the Flying Start programme and 2025 Regulations that are applicable to private maintained nurseries.

Race

Data: Those from ethnic minority backgrounds represent 15.8% of the primary school population in Wales (Mixed 4.3% Asian 3.4% and Black 2.1%)

127. The revised soon to be published Guidance supports equity of provision across Wales by reinforcing the duty under the Equality Act 2010 not to discriminate against primary learners based on race or ethnicity. It encourages schools and local authorities to consider cultural and dietary needs when designing menus, which can have a positive impact by helping to improve access to school meals for ethnic minority learners.
128. However, some ethnic minority learners may have different consumption habits that are not reflected in new menu designs. If these needs are not considered, learners may choose not to take up the school meal offer. This could

disproportionately affect ethnic minority primary learners, particularly those from socio-economically disadvantaged backgrounds, by limiting their access to nutritious food as well as impacting on families' income by requiring them to provide and pay for their own packed lunches.

129. Additionally, there is a potential health impact, as data shows that learners categorised as Black, Black British, Caribbean or African have statistically higher rates of obesity compared to White learners. Census and health data: The UK Census shows that 70.8% of Black adults were overweight or living with obesity, compared to 63.8% of all adults. This highlights the importance of ensuring equitable access to healthy meals for ethnic minority groups.
130. Separately, ethnic minority families in Wales are more likely to experience socio-economic disadvantage. If primary learners from these families do not access school meals due to cultural or dietary mismatches, it may exacerbate existing inequalities.
131. To mitigate these risks the Welsh Government will continue working closely with key delivery partners to monitor the implementation of the 2025 Regulations and guidance, identifying and addressing any emerging inequalities.
132. The soon to be published Guidance encourages local authorities and schools to work with families to understand dietary needs and make reasonable adjustments, ensuring that all learners can access the school meal offer.
133. Local authorities will be encouraged to design menus that reflect the needs of their local communities, including engagement with ethnic minority groups to understand and accommodate cultural dietary preferences. Local authorities will also be encouraged to engage with learners and involve them in menu design through school councils and other student forums.
134. The WLGA will continue to help identify and share examples of good practice, promoting consistency and inclusivity in menu planning across Wales.
135. The 2025 Regulations on food promotion and presentation aim to reshape the food environment, making healthier choices more accessible and reducing exposure to unhealthy options. Alongside this, the Welsh Government is investing in targeted programmes such as the [Children and Families Programme \(PIPYN\)](#) and the [All Wales Diabetes Prevention Programme](#), with funding directed to areas of high deprivation aimed at tackling obesity and promoting a balanced diet.

Impact on Learners with additional learning needs (as a proxy for disabled children) and learners with Disabilities

Data: Learners with additional learning needs (ALN), including those with disabilities, represent a significant proportion of the primary school population in Wales—approximately 10.1%, equating to around 20,000 learners.

136. The 2025 Regulations and soon to be published Guidance are expected to have a positive impact on disabled learners. Notably, gaps in previous guidance—particularly around what constitutes medically prescribed dietary requirements and when other reasonable adjustments should be made—have now been addressed. The updated guidance clarifies how the Equality Act 2010 interfaces with the 2025 Regulations, reinforcing the duty to make reasonable adjustments and avoid discrimination.
137. Learners with additional learning needs with specific food requirements may require tailored support to access school meal provision, such as special diets, assistance during dining, or adaptations to facilities, this may be described in a learners one page profile which may be part of a learner's individual development plan or considered as reasonable adjustments under the Equality Act 2010.) Without appropriate support, and if schools or local authorities are unable to meet their specific needs there is a risk that these learners could be negatively impacted.
138. In line with the Supporting Learners with Healthcare Needs guidance, schools are encouraged to develop Individual Healthcare Plans (IHPs) for learners with medical conditions or disabilities that affect their access to education, including school meals, specific dietary requirements and care for medical or disability related needs through reasonable adjustments. IHP should outline the specific dietary requirements, support needs, and adjustments necessary to ensure the learner can participate fully in school life.
139. The revised school food guidance complements this approach by ensuring that barriers and dietary needs identified in IDP's (including one-page profiles) or IHPs are recognised and can be considered for accommodation within the school food provision, promoting a holistic and inclusive support framework.
140. Disabled learners or those with health conditions who require a special or medically prescribed diet will be supported through the updated guidance, which affirms their right to access school meals. The revised guidance also reinforces schools' legal duty not to discriminate—either directly or indirectly—against learners with protected characteristics, including those related to religion or belief. The guidance also explains how local authorities and schools are expected to work collaboratively with learners and their families to understand their needs and identify and implement appropriate adjustments to the school food offer. This is a significant step toward ensuring equity of access and promoting inclusive practices within school food provision.
141. While the risk remains that some disabled learners may face barriers—such as unmet dietary needs or inaccessible facilities—these arise from how the 2025 Regulations and guidance are interpreted and operationalised, rather than from the 2025 Regulations and Guidance alone. Welsh Government will continue to work closely with catering leads and local authorities to monitor the implementation of the guidance. This will help identify and mitigate any emerging inequalities.

142. To support consistent decision-making across Wales, the Welsh Government is also collaborating with the WLGA's dietician to develop further resources including good practice examples, and training for local authorities that includes raising awareness of the sensory challenges and needs of some neurodivergent learners and how they can be reduced at school meal times through an adjusted food offer, or adaptations to the environment. This will help ensure that additional support is provided equitably, regardless of location.
143. The Welsh Government is also working to improve support available for specific challenges for learners with eating disorders. Local Health boards across Wales are increasingly accepting ARFID referrals and providing tailored interventions. This marks a significant step in recognising and responding to the needs of individuals with this lesser known but serious eating disorder.

Religion, belief, and non-belief

144. **Data:** There is a lack of data on the religion, belief, or non-belief of the eFSM cohort but there are some patterns that can be found in [data](#) on people living in areas of deprivation in Wales.
145. Although eFSM children will be living across Wales research patterns show that people of Muslim faith are over four times more likely than Christians to live in the 10% most deprived Lower Super Output Areas (LSOAs) in Wales, with just over 1 in 4 Muslims living in these areas (27.7%). Having said this, 38.7% of people living in the 10% most deprived LSOAs in Wales are Christian compared with 6.4% being of Muslim faith. This is because there are over 26 times more Christians living in Wales than Muslims.
146. Those with no religion are slightly more at risk than those with a religion to live in the most deprived areas.
147. The revised soon to be published guidance reinforces schools' legal duty not to discriminate against learners according to religion, belief, or non-belief. It encourages schools to work with families to provide appropriate dietary adjustments, promoting inclusion and equity and ensuring a positive impact on these groups of learners.
148. However, learners following religious diets (e.g. Halal or Kosher) may feel excluded if specific food items are unavailable or not considered in menu design. This could result in reduced uptake of school meals and unequal access to provision.
149. Local authorities currently design menus based on the needs and consumption habits of their communities. The Equality Act 2010 requires public bodies to avoid direct and indirect discrimination, which includes failing to accommodate religious dietary needs where reasonable. However, evidence from the consultation indicated that some learners and families feel religious dietary needs are not consistently met, which may discourage participation in the school meal offer.

150. To help mitigate any potential negative impacts, our revised soon to be published Guidance makes it clear that schools have a duty not to discriminate, either directly or indirectly, against those with a protected characteristic, which could be because of a religion or belief, and that they should work with the learner and their family to consider the necessary support or adjustments in relation to the school food provision. Separately, local authorities and schools are encouraged to engage with learners and families to understand dietary needs and make reasonable adjustments where appropriate.

Marriage and civil partnership

151. There is limited evidence of any impact on this group. Although eFSM learners will be living across Wales [research patterns](#) show that single people are more than twice as likely to live in the 10% most deprived LSOAs compared with those who are married or in a civil partnership (12.7% and 6.6% respectively). 10.1% of people who are separated, divorced or from a dissolved civil partnership live in the most deprived areas and 8.1% of people who are widowed live in these areas. Nearly half of all people living in the most deprived 10% of LSOAs are single. Therefore, although there is insufficient data to understand the scale of the impact of the proposal on this group it is likely that the cohort includes a disproportionate number of single parents who are separated, divorced or from a dissolved civil partnership. These families are more likely to be led by women, but there will be families also led by lone men.

Gender Reassignment (the act of transitioning and Transgender people):

152. There is insufficient data to be able to understand the scale of the impact of the proposal on this group.

Pregnancy and maternity

153. There is insufficient data to understand the scale of the impact of the proposal on this group

Sexual orientation (Lesbian, Gay and Bisexual)

154. There is insufficient data to understand the scale of the impact of the proposal on this group

Children and young people up to the age of 18

155. This assessment focuses on primary learners, with older groups (up to the age of 18) not being affected by these proposals.

Low-income households

Data: There are over 67,586 primary aged learners in Wales eligible for means tested free school meals (which is widely used a proxy for socio-economic disadvantage) or transitionally protected.

156. In this assessment, **parents from low-income households are used as a proxy** for learners with protected characteristics, particularly those who are more likely to experience socio-economic disadvantage and intersecting inequalities—such as primary learners from ethnic minority backgrounds, disabled learners, and those with additional learning needs
157. Many of these learners experience lower levels of educational attainment, often linked to socio-economic disadvantage. Providing a nutritious school meal not only supports their health and wellbeing but also contributes to better engagement, attendance, and achievement, helping to close the attainment gap.
158. However, if fewer learners choose to access free school meals because of the menu changes to comply with the 2025 Regulations this could also disproportionately affect low-income households.
159. If free school meal take-up were to decline for this cohort it could have a financial impact on families who would need to purchase provisions to provide their children with a packed lunch and may also be forced to reduce spending in other areas, like heating and other essentials, which could negatively impact on primary learners and their families.
160. The opportunities to improve the health and eating habits of learners has been carefully considered alongside the risk that fewer learners may take up the school food offer if they do not like the new menus. To mitigate this risk, primary learners have been specifically consulted with on the proposals and targeted engagement activity has taken place for learners to better understand their views and needs.
161. **Evidence** shows that learners living in areas of higher socio-economic disadvantage face higher rates of weight issues. This is of greatest concern for our primary aged learners as **evidence shows** that poverty rates are greatest for households with younger learners .
162. The 2025 Regulations and soon to be published Guidance present an opportunity to offer a nutritionally balanced school meal, reducing health inequalities associated with poor diet that are found to be prevalent within socio-disadvantaged groups.
163. The introduction of Universal Primary Free School Meals as well as these Regulations and forthcoming Guidance provides an opportunity to continue to improve the school food offer and ensure equity of the offer for all. Evidence indicates the important role of food requirements and nutritional standards as part of a whole school approach in improving primary learner's dietary habits, raising attainment and reducing health inequalities.
164. Welsh Government will continue working closely with our key delivery partners to monitor the implementation and further enable us to understand and mitigate emerging inequalities as they are identified. We will continue to encourage engagement with primary learners in menu design to ensure that learners have

their voices heard and consideration is given to their views within the parameters of the 2025 Regulations.

165. We will also continue working closely with our key partners to better understand behaviours that might impact on delivery and to identify barriers and opportunities at a local level, to support effective and equitable implementation and mitigate emerging inequalities as they are identified.

How will the proposal promote equality

Eliminating Discrimination, Harassment and Victimisation

166. The 2025 Regulations and the soon to be published Guidance seek to mitigate potential risks of both direct and indirect discrimination for:

- Neurodivergent primary learners, including those with autism or Avoidant/Restrictive Food Intake Disorder (ARFID).
- Primary learners with medically prescribed diets.
- Primary learners from ethnic or religious backgrounds with specific dietary requirements.

167. The forthcoming Guidance reinforces schools' legal duty under the Equality Act 2010 to make reasonable adjustments for disabled learners. This includes ensuring access to medically prescribed diets and accommodating the needs of primary learners with Additional Learning Needs (ALN) and neurodivergent conditions. The guidance clarifies that failure to provide appropriate dietary options could constitute discrimination because of disability, religion or belief, or race.

168. Schools must work proactively with families to understand and meet dietary needs, ensuring that no child is excluded or disadvantaged due to their protected characteristics. This includes avoiding practices that may inadvertently stigmatise or isolate learners, such as offering limited or unsuitable food options that do not reflect cultural, religious, or medical requirements. Schools should also work proactively to ensure that the dining environment is not a barrier to accessing school food and learners with needs that impact on their access to food are identified and responded to so that they can access the food offer alongside their peers.

Advancing Equality of Opportunity

169. The 2025 Regulations aim to advance equality of opportunity by improving health and attainment outcomes for all learners, with a particular focus on those from low-income households, ethnic minorities, and disabled learners. These groups are disproportionately affected by health inequalities who are more likely to experience poor health outcomes due to dietary factors, and lower educational outcomes.

170. By ensuring that all primary learners have access to healthier, nutritionally balanced meals aligned with updated UK dietary guidelines, the guidance supports improved mood, energy levels, and engagement in education. This can lead to better attendance and achievement, particularly for primary learners who may otherwise face barriers to learning due to poor nutrition.
171. The soon to be published guidance sets out the need for inclusive menu design and encouraging local authorities to collaborate with learners to reflect cultural and religious preferences in the food offer. The guidance also supports the development of inclusive practices that recognise and accommodate the diverse needs of disabled learners or learners with healthcare needs, including those with ALN and neurodivergent conditions.

Fostering Good Relations Between People

172. The soon to be published Guidance seeks to foster good relations through inclusive language and practices. For example, the use of terms like “balanced eating” rather than “healthy eating” helps avoid stigma or shame, particularly for primary learners who may struggle with food-related issues.
173. Learner voice and participation are central to the revised approach, ensuring that primary learners feel heard and respected in shaping the food offer. Shared mealtimes are promoted as opportunities to build social skills and relationships, contributing to a more inclusive and supportive school environment.
174. By recognising and valuing the diverse backgrounds and needs of learners, the guidance helps to build mutual understanding and respect among pupils, staff, and families.

What if any, barriers do people who share protected characteristics face? Can these barriers be reduced, removed, mitigated?

Summary of Barriers and Mitigation Strategies

Learner Group	Barrier	Mitigation
Neurodivergent Learners (e.g. autism, ARFID)	Sensory sensitivities to food texture, taste, or presentation or the environment may limit what these learners can eat.	The soon to be published guidance clarifies the duty to make reasonable adjustments, including flexibility in menu design and provision of safe alternatives. It will also provide clarity to local authorities/schools that they should work with learners and parents to

		<p>design menus and consider the dining environment to respond to the needs and consumption habits of their local community. Understanding and responding to learner needs and identifying approaches to remove barriers to accessing the food offer is encouraged. The use of Individual Healthcare Plans (IHPs) and Individual Development Plans (IDPs) are encouraged within the Guidance. This includes use of Individual Healthcare Plans (IHPs) and reflecting objectives Individual Development Plans (IDPs).</p>
Learners with Disabilities or Medical Needs	There may be a risk of exclusion if medically prescribed diets are not accommodated.	<p>The forthcoming revised Guidance provides legal clarity on the duty to provide medically prescribed diets and reasonable adjustments and encourages understanding and responding to learner needs in order to identify approaches to remove barriers to accessing the food offer.</p>
Ethnic Minority and Religious Groups	Cultural or religious dietary needs (e.g. Halal, Kosher) may not be	<p>Schools are expected to work with families to understand and accommodate dietary needs. The WLGA is</p>

	consistently met, leading to reduced meal uptake.	supporting local authorities with inclusive menu planning and sharing good practice.
Low-Income Households	If primary learners reject new meals, families may face financial pressure to provide packed lunches, risking food insecurity.	The Universal Primary Free School Meals (UPFSM) offer, combined with inclusive menu design and learner engagement, aims to ensure uptake and reduce stigma. Monitoring and evaluation will track impacts.
Gender and Age	Boys may be more affected by obesity; girls may be more vulnerable to eating disorders.	Portion sizes are tailored by age group. The policy promotes balanced eating and early healthy habits. Welsh Government programmes support early intervention for eating disorders.
General Barriers	The provision of unfamiliar foods along with potential limited flexibility in accommodating individual needs could reduce uptake or cause anxiety to individual learners.	The forthcoming Guidance has been revised for clarity, and training, communication strategies and learner engagement will be delivered by local authorities and educational settings.

Human Rights and UN Conventions

175. The Welsh Government's approach to revising the Healthy Eating in Schools guidance reflects a commitment to upholding the principles of **human rights**, particularly the right to adequate food, health, and non-discrimination. By reinforcing duties under the **Equality Act 2010**, the guidance ensures that learners are not placed at a substantial disadvantage due to their race, disability, religion, or socio-economic status. This includes promoting equitable access to

nutritious meals for primary learners from ethnic minority backgrounds who are statistically more likely to experience obesity and food insecurity. The strategy aligns with the broader human rights obligation to support the **well-being of all children**, ensuring that school food provision is inclusive, culturally sensitive, and responsive to individual needs.

Human Rights	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate negative Impacts?
Human Rights including Human Rights Act and UN Conventions	A rights-based approach has been adopted in the development of the new food requirements to increase children's right to access healthy food.	<p>Updating the 2025 Regulations and associated guidance has no impact on Articles 2 – 14¹, or the following European Convention on Human Rights protocols:</p> <ul style="list-style-type: none"> • Protocol 1, Articles 1 (the right to peaceful enjoyment of possessions) and 3 (the right to free elections). • Protocol 13, Article 1 (abolition of the death penalty). 	A full CRIA has been undertaken.

EU/EEA and Swiss Citizens' Rights

176. There will not be any negative impacts on EU/EEA and Swiss Citizens' Rights as a result reviewing the 2025 Regulations and associated Guidance. Individuals falling within scope of the Citizens Rights Agreements will have the same entitlements to a healthy school meal.

Monitoring and Review

177. As outlined above in Section 1, paragraphs 42-45, it is proposed that the 2025 Regulations will come into force in October 2026. Welsh Government will work closely with partners ahead of this date, gathering views as part of efforts to monitor and review progress. This will include considering whether identified impacts came to fruition and whether there were unintended consequences. This Equality Impact Assessment will be updated and published as appropriate, reflecting any new or emerging findings.

Health Impact Assessment

Introduction

178. This Health Impact Assessment evaluates the potential health effects of the updated Healthy Eating in Schools Regulations 2025 (applicable in maintained nursery and primary schools in Wales). The current school food Regulations in Wales came into force in 2013 – since then, there have been updates to the UK Government’s nutritional advice and Wales has also seen a full roll out of Universal Primary Free School Meals.
179. The new 2025 Regulations are designed to closer align school food standards in primary schools in Wales with current UK dietary guidance, supporting improved nutrition, health equity, and long-term well-being for children. Schools are critical environments for public health intervention, as children consume over a third of their daily dietary intake during the school day as well as the promotion of healthy eating and education can prevent health inequalities
180. The programme is part of a broader Welsh Government commitment to tackling child poverty, improving educational outcomes, and promoting health equity. It supports the Well-being of Future Generations (Wales) Act 2015 and aligns with national strategies such as Healthy Weight: Healthy Wales and the Child Poverty Strategy. The context for this HIA is the recognition that childhood and adolescence are crucial periods for growth and development, learning and development, requiring optimal nutrition to lay the foundation for future health and well-being. In Wales, many children’s diets fall short of national recommendations, with deprivation closely linked to poor diet quality. Schools, therefore, are an obvious setting for population-level public health interventions.

2. Population Groups Affected - positive and negative impacts on those groups:

Children from Socio-Economically Disadvantaged Households

181. Children from low-income families are likely to experience the greatest health benefits. School meals often represent a primary source of nutrition for these pupils. Improved standards will increase a child’s access to balanced, nutritious meals, which if consumed will contribute to reducing risks of obesity, type 2 diabetes, and dental decay. Enhanced nutrition supports concentration, cognitive development, and educational attainment. Financial relief for families can reduce stress and improve household wellbeing.
182. If menus do not reflect cultural or taste preferences, uptake may decline, increasing the risk of leaving vulnerable pupils without adequate

nutrition during the school day. In extreme cases, children may go hungry if suitable alternatives are unavailable. The visibility of healthy school meals could inadvertently highlight socioeconomic disparities, reinforcing stigma for families unable to provide similar food at home.

Neurodivergent Learners and Those with Disabilities or Medical Dietary Needs

183. Tailored provision through Individual Development Plans (IDPs) and Individual Healthcare Plans (IHPs) can ensure these pupils receive appropriate nutrition, preventing malnutrition and supporting emotional regulation. Improved dietary quality can enhance participation, learning outcomes, and overall wellbeing.
184. If adjustments are inconsistent or menus fail to accommodate sensory sensitivities, pupils may reject food, increasing anxiety and risk of hunger. Limited choice or lack of suitable alternatives could exacerbate exclusion and nutritional gaps.

Children from Minority Ethnic and Religious Backgrounds

185. Inclusive menu design that respects cultural and religious dietary requirements promotes equity and uptake. This supports physical health, fosters a sense of belonging, and encourages healthy eating habits.
186. Failure to accommodate cultural needs may lead to meal rejection and reduced participation, undermining health benefits. Over emphasis on one cultural norm could marginalize others, creating feelings of exclusion and affecting social cohesion. In addition, evidence shows that [children from ethnic minorities are more likely to be obese](#) and [develop type 2 diabetes](#), compared to their white peers.

Primary-Aged Learners (4–11 Years)

187. Early exposure to healthy eating habits is critical for lifelong health. Increased intake of fruit, vegetables, and wholegrains supports growth, cognitive development, and reduces chronic disease risk. Limiting sugary drinks and high-fat foods helps maintain healthy weight and dental health.
188. During transition, unfamiliar foods may lead to increased waste and reduced consumption. If children compensate by eating unhealthy snacks outside school, the overall health impact may be diminished.

Preventative Benefits for the NHS

189. The introduction of improved school food standards represents a significant opportunity to reduce the long-term burden of diet-related illness on the NHS. Childhood is a critical period for establishing lifelong eating habits,

and interventions at this stage can prevent the onset of chronic conditions that place substantial pressure on healthcare services.

190. Dietary patterns in childhood track into adulthood. Alignment with national dietary recommendations will ensure schools are environments which are supportive of healthy eating. A school environment supportive of healthy eating can influence equality of opportunity, life chances and health outcomes over the long term. In addition, it supports the capacity of children to make decisions about healthier food choices generally, while also preparing them for life where food plays a role in social gatherings.

- **Reducing Obesity and Related Conditions:**

By promoting balanced diets, the policy can help maintain healthy weight trajectories, reducing future demand for obesity-related treatments such as diabetes management and cardiovascular care.

- **Improving Oral Health:**

Limiting sugary drinks and snacks will reduce dental decay, which remains a leading cause of hospital admissions for young children.

- **Supporting Mental Health and Cognitive Development:**

Good nutrition improves mood stability and concentration, reducing risks of mental health issues later in life.

- **Long-Term Cost Savings:**

Preventative measures in childhood reduce lifetime healthcare costs, freeing NHS resources for other priorities.

Cross-Cutting Risks and Opportunities

191. The policy has strong potential to improve health outcomes, particularly for disadvantaged and vulnerable groups. However, success depends on uptake and inclusivity. Cultural sensitivity, sensory considerations, and consistent implementation are essential to avoid unintended consequences such as hunger, stigma, or inequity. When these factors are addressed, the policy can deliver transformative benefits for health, wellbeing, and educational attainment, while reducing future demand on NHS services.

3. Mitigation Measures

192. To address these risks, the implementation process must be inclusive and responsive. Menu design should involve engagement with families and communities to ensure cultural and sensory needs are met. Clearer soon to be published guidance for caterers, and those with a duty to take action to promote healthy eating and drinking, including on legal duties under the Equality Act 2010 will help schools meet their obligations to provide for diverse dietary requirements. They will emphasise that portion sizes should be age-appropriate, and familiar foods should be retained alongside new

options to encourage acceptance. Stakeholder consultation, including pupils, parents, and catering teams, will be essential. For learners with medical or sensory dietary needs, Individual Healthcare Plans and Development Plans are a helpful tool that can be used to support learners and ensure their requirements are met.

193. In addition, efforts will be made to foster system-wide collaboration across local authorities, schools, catering providers, and health professionals in relation to school food provision. This collective approach will help ensure the intended improvements are achieved and that children take up the offer of a nutritious, balanced meal. Collaboration will also support consistency in standards, enable sharing of best practice, and strengthen monitoring of uptake and quality. The alignment with national dietary recommendations offers an opportunity to integrate nutrition education into the curriculum. This can raise awareness about healthy eating habits and equip children with the knowledge to make informed dietary choices, both in school and at home.

4. Differential Impacts

194. The benefits of the Regulations will not be evenly distributed. Children from deprived communities are likely to experience the greatest improvements in health outcomes, as they rely more heavily on school meals. Conversely, there is a risk of exclusion for ethnic and cultural groups if menus are not sufficiently inclusive. Meeting medical dietary needs will be critical for neurodivergent and disabled learners. Schools with limited resources may face implementation challenges, requiring targeted support.

5. Monitoring and Evaluation

195. Monitoring will draw on existing education and health datasets, alongside evaluation of the UPFSM programme and stakeholder feedback. Uptake rates, nutritional quality, and compliance with standards will be key indicators. Public procurement data, market insight, and social listening will provide additional intelligence on implementation challenges and successes.

6. Conclusion

196. The updated Healthy Eating in Schools Regulations offer a strategic opportunity to improve child health, reduce inequalities, and embed lifelong healthy eating habits. With inclusive implementation, the policy is expected to deliver significant public health benefits across Wales.