



Llywodraeth Cymru
Welsh Government

The Healthy Eating in Schools (Nutritional Standards and Requirements) (Maintained Primary Schools) (Wales) Regulations 2025: Statutory guidance for local authorities and governing bodies

Guidance

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The Healthy Eating in Schools (Nutritional Standards and Requirements) (Maintained Primary Schools) (Wales) Regulations 2025

Audience

This guidance is intended for everyone who is involved with the provision of school food and drink in maintained primary schools. This includes local authorities and governing bodies of maintained schools (including maintained nursery schools) and those working in schools (for example headteachers, teachers, midday supervisors, teaching assistants and private and in-house catering providers). Other stakeholders with an interest may include parents and carers, learners, health professionals, dietitians and healthy schools coordinators.

Overview

This is statutory guidance for local authorities and governing bodies, to be read with the [Healthy Eating in Schools \(Nutritional Standards and Requirements\) \(Maintained Primary Schools\) \(Wales\) Regulations 2025](#) (“the Healthy Eating Regulations”) which will only apply to maintained primary schools (which for the purpose of these Regulations include maintained nursery schools, and maintained middle schools, special schools and pupil referral units (PRUs) that provide primary education). This guidance does not relate to the [Healthy Eating in Schools \(Nutritional Standards and Requirements\) \(Wales\) Regulations 2013](#) as they only apply to maintained secondary schools. Guidance to support the [Healthy Eating in Schools 2013 Regulations](#) is published separately.

Action required

Local authorities and governing bodies of maintained primary schools (which for the purpose of these Regulations include maintained nursery schools, as well as maintained middle schools, special schools and pupil referral units (PRUs) that provide primary education) must have regard to this statutory guidance.

Further information

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This document is also available in Welsh.

Additional copies

This document can be accessed from the Welsh Government's website at
<https://www.gov.wales/healthy-eating-maintained-primary-schools-statutory-guidance>

Large print, Braille and alternative language versions of this document are available on request.

Related documents

[Healthy Eating in Schools \(Wales\) Measure 2009](#)

[The Healthy Eating in Schools \(Nutritional Standards and Requirements\) \(Wales\) Regulations 2013](#)

[The Healthy Eating in Schools \(Nutritional Standards and Requirements\) \(Maintained Primary Schools\) \(Wales\) Regulations 2025](#)

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

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Introduction

The Welsh Government has reviewed the [Healthy Eating in Schools \(Nutritional Standards and Requirements\) \(Wales\) Regulations 2013](#), the supporting Healthy Eating in Maintained Schools Statutory Guidance, and the [Promotion of healthy eating and drinking in maintained schools](#) statutory guidance. The aim of the review was to:

- increase the availability of tasty, healthy, nutritionally balanced school food and drink
- help ensure that healthy eating is promoted in schools with the aim of reducing both health and attainment inequalities

Updated Healthy Eating Regulations came into force on 31 October 2026. Guidance on the duty to promote healthy eating in schools is set out in a separate document.

In discharging their duties under section 1 of the Measure to promote healthy eating and drinking by registered learners of maintained schools, local authorities and governing bodies must have regard to guidance given from time to time by Welsh Ministers on what constitutes healthy eating and drinking.

This statutory guidance ('this guidance') is issued under section 1 and, along with the Healthy Eating Regulations, is designed to help children develop healthy eating habits and ensure they have the energy and nutrition they need to get the most from their whole school day.

This guidance clarifies how the provision within the Healthy Eating Regulations should be applied. Local authorities and governing bodies are required to have regard to this guidance. This means that they must take it into account and if they decide to depart from it have clear and justifiable reasons for doing so.

Who the Healthy Eating Regulations apply to

The Healthy Eating Regulations apply to a local authority or governing body of a maintained primary school in Wales that provides food or drink before 6pm on a school day to registered learners, whether on school premises or at a place other than school premises (for example on a school trip). Where 'maintained primary schools' is used in this guidance this includes maintained nursery schools, and maintained middle schools, special schools and PRUs that provide primary education (the Healthy Eating Regulations will apply only to registered learners in Year 6 and below in such schools or PRUs).

Food covered under the Healthy Eating Regulations

The Healthy Eating Regulations impose requirements and standards about the following:

Regulation and schedule	Requirement and standard
Regulation 3 and Schedule 2	<p>'School breakfast in maintained primary schools' sets out the 4 food and drink categories permitted to be provided to registered learners at maintained primary schools as part of breakfast provision. The requirement applies regardless of whether or not a charge is made for the breakfast. Information on free breakfast in primary schools (FBIPS) can be found in the statutory guidance.</p>
Regulation 4 and Schedule 3	<p>'Food and drink provided as part of a school lunch in maintained primary schools' states what foods must and must not be provided as part of school lunch and specifies the frequency that particular foods can be provided as part of a school lunch.</p> <p>This also states which drinks can be provided in maintained primary schools as part of a school lunch.</p>
Regulation 5 and Schedule 4	<p>'Requirements for food and drink provided otherwise than as part of a school breakfast or a school lunch' sets out the requirements that apply to food provided to registered learners at maintained primary schools before 6pm on a school day outside of breakfast and lunch provision. The Schedule specifies the type of food that must and must not be provided, for example at mid-morning break and afterschool clubs. This is not an exhaustive list of food that can be provided.</p> <p>This also specifies what drinks can and cannot be provided outside of breakfast and lunch provision across the entire school day up to 6pm.</p>
Regulation 4 and Schedule 5	<p>'Nutritional standards for lunch in maintained primary schools' sets out the amount of energy that must be provided in an average daily school lunch and the amount of energy and nutrients that must be provided in an average school lunch in a menu cycle.</p>

Responsibility for ensuring compliance

Local authorities and governing bodies of maintained primary schools who provide food or drink (including where they arrange the provision or where they enter into an agreement for it to be provided) must comply with the Healthy Eating Regulations. Anyone else who is involved in providing food and drink in maintained primary schools in Wales should be aware of the statutory requirements if they plan menus, purchase and procure food and prepare food and drink for or in schools. This includes headteachers and teachers, midday supervisors, teaching assistants, and private or in-house catering providers. Other stakeholders with an interest may include parents, carers, learners, dietitians, health professionals and healthy schools practitioners.

Food and drink the Healthy Eating Regulations apply to

The Healthy Eating Regulations apply to all food and drink provided by, or under an agreement or other arrangement made by, the local authority or governing body to learners across the whole school day before 6pm in all maintained primary schools. This includes at breakfast, all break times and after-school-clubs. The Healthy Eating Regulations also apply to food and drink provided to learners at any outlet on school premises throughout the school day before 6pm where the food and drink is provided by, or under an agreement or other arrangement made by, the local authority or governing body, for example by a school tuck shop, vending machine, outside serving area or canteen.

Use of language in this guidance

The term 'must' is used when there is a statutory duty to meet a requirement.

The term 'should' is used when the advice set out should be followed by local authorities and governing bodies unless there is a clear and justifiable reason not to.

The term 'recommend' is used throughout the guidance to suggest approaches that are beneficial and support best practices.

Breakfast in maintained primary schools

Only food and drinks from the following food and drink categories can be provided during breakfast on each school day, other than plain water which should also be provided.

Each registered learner attending the breakfast session must be given the option to choose one item from each of the food and drink categories.

By 'infants' we mean registered learners in Nursery to Year 2 and by 'juniors' we mean registered learners in Year 3 to Year 6.

Within the recommended portion sizes below, these are minimum portions. Overall, juniors require a larger serving than infants.

Food and drink categories	Suggested items (where 'must' is used, this is when there is a statutory duty to meet a requirement)	Recommended portion sizes
Milk and plain plant-based drinks	Milk must be plain semi-skimmed, skimmed or 1% fat milk (or whole or semi-skimmed milk in nursery) Plain plant-based milk alternatives means soya, oat or other plant-based drinks (but not rice drinks).	At least 125ml for infants and juniors
Cereals	Whole-wheat cereals Bran flakes Porridge Cornflakes Rice-based cereals Cereals provided must not be coated or flavoured with sugar, chocolate or cocoa powder.	At least 20g for 1 whole-wheat cereal biscuit At least 30g for all other cereals
Fruit and vegetables	Fresh fruit (whole or cut into pieces) Vegetable sticks Canned fruit in natural fruit juice Dried fruit to add to cereals (dried fruit should not be provided as a standalone item) Baked beans should not be provided	Fruit – At least 40g for infants and at least 60g for juniors Vegetables – At least 40g for infants and at least 60g for juniors Dried fruit – At least 15g for infants and at least 20g for juniors
Bread and reduced fat spreads	All bread provided must be at least 50% wholemeal. This relates to the percentage of wholemeal flour within the bread (as a percentage of total flour). Reduced fat spreads means spreads made from unsaturated vegetable oil, including olive, rapeseed and sunflower varieties.	At least 1 slice for infants and juniors

Nursery learners

Milk served to learners in a nursery school or a nursery class must be semi-skimmed or full fat milk.

Primary schools

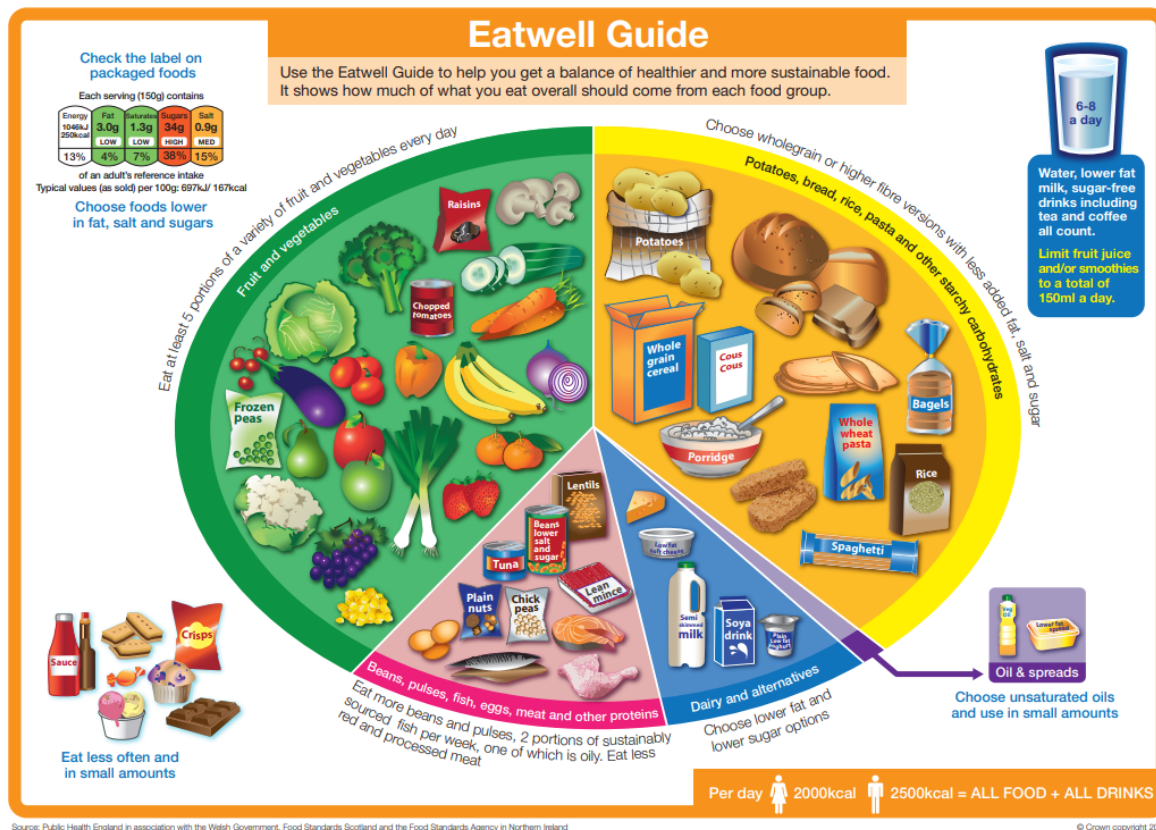
In addition to the breakfast requirements under the Healthy Eating Regulations, where free breakfasts are provided to learners in any maintained primary school, local authorities and governing bodies are also required to have regard to Welsh Government's statutory guidance on [Free breakfast in primary schools](#).

Lunch in maintained primary schools (applicable to nursery learners where lunch is provided)

The Healthy Eating Regulations and guidance have been informed by the Eatwell Guide. The guide is a policy tool used to show UK government advice on eating healthily and achieving a balanced diet.

The proposed food and drink requirements for primary school lunches within the Healthy Eating Regulations and in this guidance have been organised under the sections of the Eatwell Guide (see below) and are more closely aligned with UK healthy eating advice.

Grey shaded sections are used throughout this guidance to highlight foods and drinks that should be eaten less often and in small amounts. Grey is not a colour category used within the Eatwell Guide and is used here solely as a visual aid.



The Eatwell Guide image above shows the different food groups that make up a healthy, balanced diet and the proportion that each group should contribute. The guide is divided into:

- fruit and vegetables (green)
- potatoes, bread, rice, pasta and other starchy carbohydrates (yellow)
- beans, pulses, fish, eggs, meat and other proteins (pink)
- dairy and alternatives (blue)
- drinks (white)

- oils and spreads (purple)

It is intended to support catering providers in planning balanced meals that include foods from each of these groups.

For each section below, the Eatwell Guide advice is included, followed by the requirements in the Healthy Eating Regulations.

'Requirements' in this section are the requirements set out in Schedule 3 to the Healthy Eating Regulations relating to food which must and must not be provided as part of school lunches in maintained primary schools. The requirements must be complied with.

The requirements relate to 'provision'. This means the offer of food and drink, at the point of ordering or service, that learners could take up. Please note however that fruit or vegetables within or with desserts must be served on the plate.

Requirements relating to food and drink that is to be promoted is described in this guidance as 'must be provided'. For example, 'at least 2 portions of vegetables must be provided each day'. This means that at least 2 portions of vegetables should be offered to learners for them to take up as part of their school lunch each day.

Requirements relating to food and drink that is limited is described in this guidance as 'must not be provided more than X times a week'. For example, 'a portion of deep-fried or flash-fried food must not be provided more than once each week'. This means that no more than 1 portion of deep-fried or flash-fried foods can be offered to learners for them to take up as part of their school lunch each week. Alternative deep-fried or flash-fried foods (such as a non-meat alternative) can be offered at the same time, on the same day because learners can only take up one of these options.

Requirements relating to food and drink that is prohibited is described in this guidance as food that 'must not be provided'. For example, 'Confectionery must not be provided'.

Portion sizes

There are 2 portion sizes set out within this guidance – infants and juniors. By 'infants' we mean registered learners in Nursery (maintained settings) to Year 2 and by 'juniors' we mean registered learners in Year 3 to Year 6.

The portion sizes are set out in detail for specific food items and categories below on page 28. Throughout this guidance, all portions are the cooked weight, unless stated otherwise. Where there are requirements to promote certain food categories, there is a minimum weight specified. Where food categories are limited, there is a maximum weight. A weight range with a minimum and maximum weight is provided for some food items. The minimum and maximum portion sizes should be adhered to unless there is a clear justification for why they cannot or should not be adhered to.

The Healthy Eating Regulations set out separate nutritional standards for an average infant school lunch and an average junior school lunch. The portion sizes contained within this guidance will support local authorities and governing bodies to work towards compliance with these standards by setting out appropriate sizes for many of the foods served. However, to aid compliance, local authorities and governing bodies should consider the portion sizes of all foods, including those not covered by this guidance.

Learners should be encouraged to take up all elements of the school lunch provided to them, particularly the promoted food and drink. This will provide a balanced meal in line with the nutritional standards for an average school lunch.

It is recommended that taster portions are offered to introduce learners to dishes they may not have tried before.

Eatwell Guide (Green food group)

Fruit and vegetables

- Eat at least 5 portions of a variety of these each day.
- These are a good source of vitamins, minerals and fibre.

Requirement (must do)

At least 2 portions of vegetables must be provided each day.

At least 6 varieties of vegetables must be provided each week.

Vegetables includes salad but excludes potatoes.

Different vegetables (mixed) provided as a single portion count as 1 vegetable portion.

Interpretation

Can be fresh, frozen, canned or vacuum-packed.

Includes beans and pulses which count towards 1 portion of your 5 a day.

If baked beans were offered as a vegetable, this does not count towards the beans or pulses standard.

Mixed vegetables and mixed salad provided as a single portion count as 1 portion and as 1 variety.

Portions can be provided separately or within a recipe.

Sweet potatoes can be categorised as a vegetable portion when used in recipes where they would not provide a starchy carbohydrate portion (for example sweet potato and chickpea curry or sweet potato brownies).

Recommendations (could do, as best practice)

It is recommended that baked beans in tomato sauce be reduced sugar and salt varieties. It is recommended that baked beans are not provided more than 3 days per week.

Provide at least 1 portion of vegetables alongside the portions of vegetables included within a meal.

Provide a variety of seasonal, locally produced vegetables.

Encourage take-up of vegetables. This could include offering tasting sessions and considering how vegetables are displayed on the counter or plate.

Portion sizes

At least 40g for infants

At least 60g for juniors

Vegetables (Green food group)**Requirement (must do)**

At least 2 portions of vegetables must be provided each day.

At least 6 varieties of vegetables must be provided each week.

Vegetables includes salad but excludes potatoes.

Different vegetables (mixed) provided as a single portion count as 1 vegetable portion.

Interpretation

Can be fresh, frozen, canned or vacuum-packed.

Includes beans and pulses which count towards 1 portion of your 5 a day.

If baked beans were offered as a vegetable, this does not count towards the beans or pulses standard.

Mixed vegetables and mixed salad provided as a single portion count as 1 portion and as 1 variety.

Portions can be provided separately or within a recipe.

Sweet potatoes can be categorised as a vegetable portion when used in recipes where they would not provide a starchy carbohydrate portion (for example sweet potato and chickpea curry or sweet potato brownies).

Recommendations (could do, as best practice)

It is recommended that baked beans in tomato sauce be reduced sugar and salt varieties. It is recommended that baked beans are not provided more than 3 days per week.

Provide at least 1 portion of vegetables alongside the portions of vegetables included within a meal.

Provide a variety of seasonal, locally produced vegetables.

Encourage take-up of vegetables. This could include offering tasting sessions and considering how vegetables are displayed on the counter or plate.

Portion sizes

At least 40g for infants

At least 60g for juniors

Fruit (Green food group)

Requirements (must do)

At least 1 portion of fruit must be provided each day.

At least 4 different types of fruit must be provided each week.

Different fruits provided as a single portion count as 1 fruit.

Fruit does not include fruit juice.

Interpretation

Can be fresh, dried, frozen or canned.

Portions can be provided separately or within a recipe.

Fruit salad and fruit cocktail provided as a single portion will count as 1 portion and as 1 variety.

Fruit juice is not permitted as a portion of fruit.

Guidance (should do, unless there are clear and justifiable reasons not to)

Canned fruit should be in fruit juice only (not canned in syrup) and should not contain added sugar.

Fruit must be offered and should be promoted and encouraged.

Portion sizes

At least 40g (fruit) or at least 15g and no more than 20g (dried fruit) for infants.

At least 60g (fruit) or at least 15g and no more than 20g (dried fruit) for juniors.

If fresh and dried fruit are combined and either the fresh fruit or the dried fruit portion size is provided, this would satisfy the requirement to provide 1 portion of fruit. For example, if 15g of dried fruit is used, a portion of fruit would be provided and a full fresh fruit portion would not also be required.

Dessert portion of Fruit or Vegetable (Green food group)

Requirements (must do)

All sweetened baked products and desserts, yoghurt and cheese (with or without plain unflavoured crackers) provided must contain or be accompanied by a dessert portion of fruit or vegetables.

A dessert portion of fruit or vegetables is at least 20g (infants) or 40g (juniors) of fruit (other than dried fruit) or vegetables.

At least 10g for infants and at least 15g for juniors of dried fruit

Interpretation

Fruit or vegetables must be provided on the plate within or alongside a sweetened baked product, dessert, yoghurt or cheese (in the case of cheese, this is cheese provided at the end of a school lunch).

Fruit or vegetables may be incorporated into the product or dessert (for example apple in crumble) or provided as an accompaniment (for example a yoghurt and sliced fruit).

A combination of fruit and vegetables can be provided (for example, beetroot and orange brownie).

Recommendation (could do, as best practice)

Provide a variety of seasonal, locally produced fruit or vegetables.

Eatwell Guide (Yellow food group)

Potatoes, bread, rice, pasta and other starchy carbohydrates

All meals should be based around starchy carbohydrates.

Choose wholegrain or higher fibre versions with no or low added fat, salt and sugar.

These are a good source of energy and the main source of a range of nutrients in our diet.

Potatoes, rice, pasta and other starchy carbohydrates (Yellow food group)

Requirements (must do)

A portion of starchy carbohydrates must be provided every day.

At least 3 types of starchy carbohydrates must be provided each week.

At least 1 portion of starchy carbohydrates provided each week must be pasta, noodles or rice containing at least 50% wholegrain (see below in interpretation list for starchy carbohydrates).

Starchy carbohydrates does not include potatoes, or potato products cooked in fat or oil. If potatoes or potato products cooked in fat or oil have been provided therefore, an alternative from this category must be provided.

Interpretation

The minimum wholegrain requirement for rice relates to the percentage of wholegrain rice within portions (as a percentage of total rice).

The minimum wholegrain requirement for pasta and noodles relates to the percentage of wholegrain flour within products (as a percentage of total flour) or the percentage of wholegrain pasta or wholegrain noodles within portions (as a percentage of total pasta or noodles).

Starchy carbohydrates include bread, potatoes (other than where cooked in fat or oil), rice, pasta, noodles and couscous – this list is not exhaustive. See below for separate requirements for potatoes and potato products cooked in fats or oils.

Sweet potatoes should be classed as a starchy carbohydrate when used as a replacement for white potatoes (for example baked sweet potato, fries).

Please note sweet potatoes may also be categorised as a vegetable portion when used in recipes where they do not provide a starchy carbohydrate portion (for example sweet potato and chickpea curry or sweet potato brownies).

Guidance (should do, unless there are clear and justifiable reasons not to)

The wholegrain percentage should be gradually increased from 50% to 100%, being mindful of consumption and waste (the rate of increase can vary according to local needs).

Recommendations (could do, as best practice)

Where possible, take steps to source other bread-based products (for example pizza, naan and garlic bread) that are at least 50% wholemeal in relation to their percentage of wholegrain flour (as a percentage of total flour).

Where possible, leave the skin on potatoes to maximise consumption of fibre.

Portion sizes

- Baked potatoes – At least 100g for infants, at least 150g for juniors.
- Mashed and boiled potatoes – At least 105g for infants, at least 160g for juniors.
- Dry roasted potatoes (no fat or oil added) - At least 100g for infants, at least 150g for juniors.
- Rice At least 75g cooked (approx.30g dried) for infants, at least 115g cooked (approx. 45g dried) for juniors.
- Pasta – At least 75g cooked (approx. 35g dried) for infants, at least 115g cooked (approx. 55g dried) for juniors.
- Noodles – At least 75g cooked (approx. 30g dried) for infants, at least 115g cooked (approx. 55g dried) for juniors.
- Cous-cous – At least 65g cooked (approx. 33g dried) for infants, at least 100g cooked (approx. 50g dried) for juniors.

Bread (Yellow food group)

Requirements (must do)

All bread (except garlic bread, naan bread, pizza bases, tea cakes and crumpets) provided must be at least 50% wholegrain.

Supplementary bread (with no added fat or oil) must be available every day at lunchtime to those learners who want it.

Interpretation

The minimum wholegrain requirement for bread relates to the percentage of wholegrain flour within the bread (as a percentage of total flour).

This includes bread within sandwich-type foods where ingredients are placed between or wrapped in bread. Examples include, but are not limited to, sandwiches, baguettes and wraps.

Supplementary bread is bread that does not form part of a sandwich or a set meal. This is provided in addition to the food and drink that is included within the nutritional analysis of an average primary school lunch. It is intended for learners who are still hungry after taking up and consuming the school lunch provided to them. Supplementary bread must not be included within nutritional analysis calculations.

Guidance (should do, unless there are clear and justifiable reasons not to)

The wholegrain percentage should be gradually increased from 50% to 100%, being mindful of consumption and waste (the rate of increase can vary according to local needs).

Recommendations (could do, as best practice)

Where possible, take steps to source other bread-based products (for example pizza, naan and garlic bread) that are at least 50% wholegrain in relation to their percentage of wholegrain flour (as a percentage of total flour).

Portion sizes

Bread as a portion of secondary starchy carbohydrate (for example naan or garlic bread where another primary starchy carbohydrate is provided) 25g to 30g for infants and juniors.

- Pizza – At least 55g but no more than 95g (per slice including the topping).
- Supplementary bread – No more than 2 slices of medium sliced bread for juniors and no more than 1 slice of medium sliced bread for infants.
- Bread as a portion of starchy carbohydrates – 50g to 70g for infants and juniors.

Eatwell Guide (Pink food group)

Beans, pulses, fish, eggs, meat and other protein foods

Eat more beans and pulses.

Eat 2 portions of sustainably sourced fish per week, 1 of which should be oily.

Eat less red and processed meat.

These foods are good sources of protein, vitamins and minerals.

Beans and pulses (Pink food group)

Requirements (must do)

Either beans or pulses or both must be provided as the main source of protein in a non-meat and non-fish school lunch at least once a week.

Interpretation

A non-meat and non-fish school lunch is a school lunch that is provided as an alternative to a school lunch providing meat or fish on the same school day.

Guidance (should do, unless there are clear and justifiable reasons not to)

A wide variety of pulses, such as different types of beans and lentils, should be used rather than relying solely on baked beans.

Expanding the range of pulses on school menus helps increase dietary diversity and promotes the consumption of natural, minimally processed pulses to support healthier choices and broaden children's exposure to nutrient-rich food.

Recommendations (could do, as best practice)

Take opportunities to provide beans and pulses across all food options (not only the non-meat and non-fish option.)

Portion sizes

At least 55g for infants and juniors.

Fish (Pink food group)

Requirements (must do)

A portion of fish must be provided at least once each week.

At least 1 portion of fish provided every 4 weeks must be oily fish.

Fish combined with at least one other ingredient to form a fish product must contain at least 50% fish, measured by the weight of the cooked ingredients.

Interpretation

Can be fresh, frozen or canned.

Fish are a good source of vitamins and minerals; however, oily fish is particularly high in omega-3 fatty acids.

Oily fish includes but is not limited to anchovies, herring, kipper, mackerel, pilchards, salmon, sardines, trout and whitebait.

Fish products that do not contain oily fish, but which are fortified with omega-3 fatty acids, do not count towards the oily fish requirement.

Guidance (should do, unless there are clear and justifiable reasons not to)

Fish procured should be sustainably sourced.

Recommendations (could do, as best practice)

Use oily fish fillets (fresh, frozen or canned) as they provide significantly more omega-3 fatty acids than coated oily fish products.

Choose canned fish that's not in brine or oil.

Portion sizes

- Fish and oily fish – At least 50g for infants and juniors.
- Fish combined with at least one other ingredient to form a fish product – At least 25g fish for infants and juniors. Fish products must contain at least 50% fish by weight of the cooked ingredients; portion sizes do not alter this requirement.

Red meat (Pink food group)**Requirements (must do)**

A portion of red meat must be provided at least once a week.

Red meat must not be provided more than twice a week.

For the purpose of the above requirements, 'red meat' does not include a specified meat product.

Interpretation

Red meat means meat of mammalian species including beef, lamb, mutton, pork, veal, venison and goat meat. It does not include rabbit meat.

This does not include white meat.

Guidance

Leaner cuts of meat should be used. Trim off visible fat and skim off excess fat during cooking and use mince with a lower fat content.

Recommendations (could do, as best practice)

Use opportunities to reduce red meat in recipes by adding beans, pulses or more vegetables. This will also increase fibre and reduce the saturated fat content of meals.

Portion sizes

No more than 55g for infants and juniors.

Specified meat products (Pink food group)**Requirements (must do)**

A portion of a specified meat product must not be provided more than once each week.

This requirement does not apply to ham provided as part of a school lunch on a school trip. In calculating the number of times a portion of specified meat product is provided each week, ham provided on a school trip must not form part of the calculation.

Interpretation

Specified meat product means:

- bacon
- burger consisting of a mixture of meat and other ingredients
- canned or tinned meat
- chorizo
- corned meat
- gammon
- ham
- meatballs
- pastrami
- pâté containing meat or liver of any mammalian or bird species
- salami (including pepperoni)
- sausage consisting of a mixture of meat and other ingredients
- a food that contains one of the following as an ingredient whether or not the food also contains any other ingredient:
 - mechanically separated meat
 - the carpus, the heart, the muscles of the head (other than masseters), the tarsus, the tail or the tongue of any mammalian or bird species recognised as fit for human consumption
 - any other shaped or formed meat product not falling within the bullet points above consisting of a mixture of meat and other ingredients

Fresh meat cuts can be used for burgers, meatballs and food falling within the 'any other shaped or formed product' category above, where they are made:

- on school premises
- on premises owned or occupied by a local authority

- where the local authority or governing body of a maintained primary school have a contract with a third party to provide school lunches, on premises owned or occupied by that third party

To note, where meat cuts are used in this way they will not be classed as specified meat products when they are provided as part of a school lunch.

'Ham' includes jambon de Paris, prosciutto, serrano ham and similar products.

'Sausage' includes chipolata, corn dog, hot dog, frankfurter, sausage meat and similar products.

'Any other shaped or formed meat product' does not include a sliced cut of meat (this could be meat that is sliced on school premises or pre-sliced at a place other than school premises).

Recommendations (could do, as best practice)

Gradually reduce the provision from 1 portion each week to none each week.

Portion sizes

No more than 55g for infants and juniors

Processed alternatives to meat and fish (Pink food group)

Requirements (must do)

A portion of processed alternatives to meat and fish must not be provided more than twice a week.

Interpretation

Industrially produced processed non-meat and non-fish food products that attempt to mimic meat or fish products, such as mycoprotein sausages and burgers and plant-based sausages and burgers.

These do not include soya, mycoprotein and pea protein mince, chunks or pieces.

Baked beans, hummus and nuts are not included as these do not come within this description.

Recommendations (could do, as best practice)

Gradually reduce the offer from 2 portions per week to 1 or none per week.

Portion sizes

No more than 55g for infants and juniors.

Egg (Pink food group)

Recommendations (could do, as best practice)

A minimum portion of 1 egg could be provided as a source of protein.

Eggs can be included as an additional source of protein, providing a versatile and nutrient-rich option to support a balanced diet.

Eatwell Guide (Purple food group)

Oils and spreads

Choose unsaturated oils and spreads and eat in small amounts.

Interpretation

Includes vegetable, olive, rapeseed and sunflower oils and spreads.

Recommendations

Fats and oils should be used in moderation, including during cooking. All types of fat are high in energy and should be limited.

Grey shaded sections highlight foods and drinks that should be eaten less often and in small amounts.

Other foods high in fat, salt and sugars (Grey food group)

If consuming foods and drinks high in fat, salt or sugar, have these less often and in small amounts.

These foods are not needed in our diet.

Recipes and products developed for primary schools are not usually high in fat, salt or sugar, but are restricted to convey consistent healthy eating messages.

Potato or potato products cooked in fat or oil (Grey food group)

Requirements (must do)

A portion of potato or potato products cooked in fat or oil must not be provided more than twice each week, and where provided no more than 1 portion may be deep-fried.

Interpretation

This means any potato or potato products cooked in fat or oil. It includes fat or oil added to potatoes before or during the cooking process and fat or oil in the coating of potato products. 'Deep-fried' means deep-fried during the manufacturing process or during the cooking process. Examples include, but are not limited to, chipped potatoes, potato shapes, hashbrowns, roast potatoes, diced potatoes and potato wedges.

When potatoes prepared in fat or oil are offered, an alternative starchy carbohydrate not cooked in fat or oil must also be available.

Recommendations (could do, as best practice)

Seek opportunities to reduce potato products which have been coated in or cooked in fat or oil during the manufacturing process or during preparation from scratch.

Take steps to remove deep-fat fryers altogether.

Portion sizes

Potatoes cooked in fat or oil (other than roast potatoes)

No more than 60g for infants and no more than 85g for juniors.

Roast potatoes cooked in fat or oil

No more than 75g for infants and no more than 115g for juniors.

Deep-fried or flash-fried food or where coating or breadcrumb contains oil (Grey food group)

Requirements (must do)

A deep-fried or flash-fried food, or foods where coating or breadcrumb contains oil, must not be provided more than once each week.

Interpretation

Alternative deep-fried or flash-fried foods can be offered at the same time, on the same day, because learners can only take up one of these options.

Deep-fried means to cook by immersing in a deep utensil of fat or oil. Flash-fried means to cook quickly in hot fat or oil. They apply to manufactured or prepared-from-scratch foods.

They include foods that have been coated or breaded with the addition of oil during the manufacturing process. Such foods may be baked rather than deep-fried or flash-fried.

They do not include potato and potato products.

Recommendations (could do, as best practice)

Take steps to remove these food items from the menu over time, replacing them with healthier alternatives and replacing deep-fat fryers with healthy cooking appliances.

Portion sizes

The food items that would be included within this section have been attributed portion sizes under other food categories.

Pastry and pastry products (Grey food group)

Requirements (must do)

Pastry or products containing pastry (whether sweet or savoury) must not be provided more than once a week.

Interpretation

Alternative pastry and pastry products can be offered at the same time, on the same day, because learners can only take up one of these options (for example sausage roll and vegetarian sausage roll).

A sweet and savoury pastry product cannot be served on the same day (for example sausage roll and apple pie).

Recommendations (could do, as best practice)

When making pastry from scratch, it is recommended the flour be at least 50% wholegrain. Take steps to source pastry products where the flour is at least 50% wholegrain.

Portion sizes

No more than 25g of pastry for infants and no more than 40g of pastry for juniors.

Sweetened baked products and desserts (Grey food group)**Requirements (must do)**

Sweetened baked products and desserts must not be provided more than 3 times a week. This restriction does not apply to ambient or chilled yoghurt.

Interpretation

Sweetened baked products and desserts contain ingredients which are a source of saturated fat and free sugars that have been added to make them sweeter. Such an ingredient includes, but is not limited to, sugar, fruit juice, honey syrup or [artificial sweeteners](#).

They include sweet (but not savoury) pastry and sweet products containing pastry.

Examples include, but are not limited to, jelly, ice cream, whips, cakes and biscuits. It includes frozen yoghurt because of its high free sugar content.

They exclude chilled or ambient yoghurt.

Recommendations (could do, as best practice)

When making sweetened baked products and desserts from scratch, it is recommended the flour be at least 50% wholegrain.

Take steps to source sweetened baked products and desserts where the flour is at least 50% wholegrain.

Consideration should be given to providing reduced-sugar yoghurts, as they are a healthier option and support compliance with free sugar standards.

Gradually phase out the frequency of sweetened baked products and desserts to support children in making healthier choices. It is important that children are taught to see this type of product as one that should be enjoyed occasionally as part of a balanced diet rather than something to be consumed every day.

Portion sizes

- Biscuits* – no more than 30g for infants and juniors.
- Cakes* – no more than 40g for infants and juniors.
- Flapjack* – no more than 40g for infants and juniors.
- Sponge pudding* – no more than 40g for infants and juniors.
- Crumble* – fruit crumble must have at least 20g of fruit for infants and 40g of fruit for juniors if it is to satisfy the dessert portion of fruit requirement.
- Yoghurt – at least 80g but no more than 120g for infants and juniors.
- Rice pudding – at least 100g but no more than 120g for infants and juniors.
- Custard – at least 60g but no more than 80g for infants and juniors.
- Ice cream and frozen yoghurt – no more than 80ml portion for infants and juniors.

* Exclude any additional fruit, vegetables or seeds and the dry weight is for mixes.

Confectionery (Grey food group)

Requirements (must do)

Confectionery and food containing confectionery must not be provided.

Interpretation

No confectionery is permitted.

Confectionery means the following:

- cereal bars
- chewing gum
- chocolate in any form
- any product containing chocolate or wholly or partially coated with chocolate
- any chocolate-flavoured substance (except cocoa powder used in sweetened baked products and desserts)
- decorative toppings made from sugar or icings made from sugar
- processed or extruded fruit bars
- other non-chocolate confectionery (whether or not containing sugar) including mints

Cereal bars can be chewy or crunchy.

Chewing gum includes sugar-free chewing gum.

Savoury snacks (Grey food group)

Requirements (must do)

Savoury snacks must not be provided.

Interpretation

Savoury snacks mean pre-packaged savoury items which are ready to eat without further preparation. They consist of, or include as a basic ingredient, potato or other root vegetables, cereals, legumes, nuts or seeds. They do not include:

- legumes, nuts, seeds or root vegetables with no added fat, salt or sugar
- plain unflavoured crackers, oatcakes or water biscuits
- sandwiches

Examples of the types of savoury snacks that must not be provided include but are not limited to:

- crisps (whether made with potatoes or root vegetables)
- popcorn (whether plain, sweetened or salted)
- rice cakes (whether plain or flavoured)
- Bombay mix
- flavoured savoury biscuits or crackers
- breadsticks
- legumes with added salt, sugar or fat (such as chickpea puffs)

Removing the packaging does not exempt these products.

Drinks in maintained primary schools

Eatwell Guide (White food group)

Drinks (White food group)

Drink 6 to 8 cups or glasses of fluid each day (water and lower-fat milk).

Requirements (must do)

Only plain water, plain milk and plain plant-based drinks may be provided.

Plain water (White food group)

Interpretation

Still or carbonated

Does not contain artificial or natural sweeteners, sugars, honey, colouring or flavouring.

Learners in all maintained schools must have easy access at all times to free, fresh drinking water, especially during breakfast sessions and lunchtimes.

Guidance (should do, unless there are clear and justifiable reasons not to)

Water stations in the dining room and throughout the school should be signposted.

Following the guidance found in the [Promotion of healthy eating and drinking in maintained schools guidance](#), a school should be aware of where and how drinking water is available free of charge, consider the use of water coolers and fountains, and promote healthy hydration during the school day and the use of water bottles.

Make sure the supervisors direct children to available water sources at lunchtime.

Freshly poured tap water should be provided together with cups or glasses on tables or at the serving counter if required.

Discretion can be given to serving milk or plant-based alternatives at lunch. If provided, a serving should be 125ml.

Recommendations (could do, as best practice)

Chilled water is more appealing.

Plain milk (White food group)

Requirements (must do)

Milk provided to nursery children must be semi-skimmed or whole milk.

For all other learners it must be semi-skimmed, 1% fat or skimmed milk.

Interpretation

No added substances

Guidance (should do, unless there are clear and justifiable reasons not to)

Where possible lower fat milk should be chosen as it contains the same amount of calcium, protein and other nutrients as fuller-fat equivalents. Skimmed milk contains the lowest levels of fat, followed by 1% fat milk and semi-skimmed milk.

If milk is provided at lunch, a serving should be 125ml.

Recommendations (could do, as best practice)

Maintained primary schools can take advantage of the free and subsidised milk scheme.

Plain plant-based drinks (White food group)

Interpretation

Means soya, oat or other plant-based drinks (but not including rice drinks), which are fortified with calcium, unflavoured and do not contain free sugar (for example, do not contain strawberry or vanilla flavouring).

Plain plant-based drinks must be fortified with calcium.

Guidance (should do, unless there are clear and justifiable reasons not to)

If a plain plant-based drink is provided at lunch, a serving should be 125ml.

Plain plant-based drink should:

- be labelled with 'no free sugars'
- have a maximum threshold of $\leq 0.5\text{g}$ total sugars per 100ml (aligned with legal criteria for no sugars)
- be fortified with vitamin A, riboflavin, vitamin B12, vitamin D and iodine to match the nutritional profile of cow's milk where possible

Fruit juice is only permitted to be provided on a school trip.

The essential need is to provide fresh, readily available drinking water in all maintained schools.

Portion sizes

The following portion sizes are cooked weights (unless specified otherwise).

Vegetables (Green food group)	Primary portion
Cooked (includes baked beans, pulses and cooked vegetables)	Infants: minimum of 40g Juniors: minimum of 60g
Raw (includes salad, coleslaw and uncooked veg)	Infants: minimum of 40g Juniors: minimum of 60g

Fruit (Green food group)	Primary portion
Fruit	Infants: minimum of 40g Juniors: minimum of 60g
Dried fruit	Infants: minimum of 15g and maximum of 20g Juniors: minimum of 15g and maximum of 20g

Fruit or vegetables in or with desserts (Green food group)	Primary portion
Fruit and vegetables within a sweetened baked product or dessert or as an accompaniment	Infants: minimum of 20g or at least 10g of dried fruit Juniors: minimum of 40g or at least 15g of dried fruit

Potatoes, bread, rice, pasta and other starchy carbohydrates (Yellow food group)	Primary portion
Mashed potato	Infants: minimum of 105g Juniors: minimum of 160g
Boiled potato	Infants: minimum of 105g Juniors: minimum of 160g
Baked potato	Infants: minimum of 100g Juniors: minimum of 150g
Dry roasted potatoes	Infants: minimum of 100g Juniors: minimum of 150g
Rice	Infants: minimum of 75g cooked (approx. 30g dried) Juniors: minimum of 115g cooked (approx. 45g dried)
Pasta	Infants: minimum of 75g cooked (approx. 35g dried) Juniors: Minimum of 115g cooked (approx. 55g dried)
Noodles	Infants: minimum of 75g cooked (approx. 30g dried) Juniors: minimum of 115g cooked (approx. 55g dried)
Cous-cous	Infants: minimum of 65g cooked (approx. 33g dried) Juniors = minimum of 100g cooked (approx. 50g dried)
Bread (offered as part of a meal)	Infants: 25g to 35g suggested Juniors: 25g to 35g suggested
Bread* (main component of a meal)	Infants: 50g to 70g suggested Juniors: 50g to 70g suggested
Supplementary bread	No more than 1 slice of medium sliced bread for infants No more than 2 slices of medium sliced bread for juniors
Pizza	Infants: at least 55g but no more than 95g (slice composite base and cheese topping) Juniors: at least 55g but no more than 95g (slice composite base and cheese topping)

Beans, pulses, fish, eggs, meat and other proteins (Pink food group)	Primary portion
Fish and oily fish portions	Infants: Minimum of 50g portion

	Juniors: Minimum of 50g portion
Fish and oily fish products	<p>Infants: Minimum of 50g portion, of which minimum 50% fish content (at least 25g of fish)</p> <p>Juniors: Minimum of 50g portion, of which minimum 50% fish content (at least 25g of fish)</p>
Red meat (other than specified meat products)	<p>Infants: no more than 55g</p> <p>Juniors: no more than 55g</p>
Poultry	<p>Infants: 40g to 60g suggested</p> <p>Juniors: 40g to 60g suggested</p>
Specified meat products	<p>Infants: no more than 55g</p> <p>Juniors: no more than 55g</p>
Processed alternatives to meat and fish	<p>Infants: no more than 55g</p> <p>Juniors: no more than 55g</p>
Beans and pulses	<p>Infants: 55g suggested</p> <p>Juniors: 55g suggested</p>

Potato and potato products cooked in fat or oil (Grey food group)	Primary portion
Potato products cooked in fat or oil (potato shapes, hashbrowns, chips, diced and wedges)	<p>Infants: no more than 60g</p> <p>Juniors: no more than 85g</p>
Roast potatoes cooked in fat or oil	<p>Infants: no more than 75g</p> <p>Juniors: no more than 115g</p>

Pastry and pastry products (Grey food group)	Primary portion
Pastry	<p>Infants: no more than 25g of pastry</p> <p>Juniors: no more than 40g of pastry</p>

Sweetened baked products and desserts (Grey food group)	Primary portion
Freshly baked and commercially produced baked goods (for example biscuits, cookies, cakes, brownies, flapjacks)	<p>Biscuits: no more than 30g Cake (brownies, sponges, Welsh cakes, muffins, cupcakes): no more than 40g Flapjack: no more than 40g</p> <p>All the above are for the mixes (based on dry weight – these figures exclude any additional fruit, vegetables and seeds)</p>
Sweetened desserts such as sponge puddings, cheesecakes, crumbles, tarts, jelly	Sponge pudding: no more than 40g for the constituent ingredients based on dry weight (excluding fruit, vegetables and seeds)
Frozen desserts such as ice cream	<p>Infants: no more than 80ml Juniors: no more than 80ml</p>
Rice pudding	<p>Infants: At least 100g but no more than 120g Juniors: At least 100g but no more than 120g</p>
Custard	<p>Infants: At least 60g but no more than 80g Juniors: At least 60g but no more than 80g</p>

Yoghurt (chilled or ambient)	Primary portion
Yoghurts	<p>Infants: At least 80g but no more than 120g Juniors: At least 80g but no more than 120g</p>
Cheese (with crackers)	<p>Infants: 15g to 25g suggested Juniors: 15g to 25g suggested</p>

Condiments (Grey food group)	Primary portion
Condiments include but are not limited to tomato ketchup, brown sauce, salad cream, mayonnaise, French dressing, tartare sauce, mustard, pickles and relishes	<p>Infants: no more than 10ml Juniors: no more than 10ml</p>

Requirements for food provided otherwise than as part of a school breakfast or a school lunch

Nursery-aged children need healthy snacks between meals that are the appropriate portion size for their age, to meet their nutritional requirement. Snacks to avoid include sugary snacks, savoury pre-packed snacks, nuts and popcorn, tree nuts and peanuts. (For guidance on tree nuts and peanuts see page 66 of Welsh Government's [Food and nutrition for Childcare settings: Section 4](#)).

Breaktime snack provision for primary learners other than nursery learners should consist of fruit and vegetables only. Fruit and vegetables must be available in any place on school premises where food is provided.

The following table outlines food between meals that is recommended during different parts of the day, and food that is prohibited.

Product – recommended provision	Nursery snack provision	Primary learners breaktime provision	After-school provision
Vegetables			
Fruit			
Protein items such as hummus, tuna and chicken			
Bread-based products (at least 50% wholemeal bread), English muffins, crumpets, bagels			
Plain cream crackers, water biscuits and oatcakes			
Small sandwiches, wraps, baguettes with a variety of non-mayonnaise-based fillings including salad			
Dairy products such as yoghurts and cheese			
Foods prohibited			
Red meat			
Specified meat products			

Processed alternatives to meat and fish			
-			
Potato and potato products cooked in fat or oil			
-			
Deep-fried or flash-fried foods			
-			
Pastry and pastry products			
Sweetened baked products and desserts (not including ambient or chilled yoghurt)			
Salt			
Confectionery			
Savoury snacks			

Vending

Food selected for selling in vending machines must follow the requirements for food provision served outside of breakfast and lunch time under the Healthy Eating Regulations. Further, where vending is used to provide food at lunchtime, the food available must be nutritionally analysed along with the rest of the lunch provision.

Nutritional standards

The nutritional standards in the Healthy Eating Regulations for an average school lunch are based on the most up-to-date scientific research and dietary guidelines, reflecting the energy and nutrient needs of primary [school](#)-aged children (see [Government Dietary Recommendations](#)).

Average school lunch

The nutritional standards for an average school lunch are designed to provide a maximum 30% of a child's daily needs for [macronutrients](#) (energy, carbohydrates, protein, fat, saturated fat, free sugar and fibre – see [Government Dietary Recommendations](#)) and a minimum 35% of their daily needs for key micronutrients (iron, calcium, folate, zinc, vitamin A and vitamin C). Sodium is an exception, with a maximum allowance set at 30% of the daily limit.

These guidelines have been developed on the basis that children eat 3 meals a day, with lunch making up around one-third of their daily intake.

The energy and nutrients in an average school lunch will be analysed per menu cycle (1 to 4 weeks) rather than weekly. The energy in an average school lunch will also be analysed on a daily basis. An average school lunch must provide:

- the amount of energy shown in the table below, within a 15% daily tolerance and 5% tolerance per menu cycle
- no more than the maximum amount shown in the table for fat, saturated fat, free sugars and sodium
- at least the minimum amount shown in the table for carbohydrate, fibre, protein, iron, zinc, calcium, vitamin A, vitamin C and folate

The nutritional standards are split into 2 different age groups:

- juniors (Year 3 to Year 6) based upon the average needs of 7 to 10-year-olds
- infants (Nursery to Year 2) based on the average needs of 4 to 6-year-olds

See the following table.

Table of energy and nutrient standards for Year 3 to Year 6 and Nursery to Year 2

Nutrient	Percentage of daily requirement*	Year 3 to Year 6	Nursery to Year 2	Minimum or maximum
Energy (Kcal)	30%	528 (permitted range on a daily basis is 449 to 607 and over a menu cycle is 502 to 554)	429 (permitted range on a daily basis is 365 to 493 and over a menu cycle is 408 to 450)	(15% daily tolerance, 5% tolerance over a menu cycle)
Fat (g)	30%	20.5	16.8	Max
Saturated fat (g)	30%	6.5	5.3	Max
Carbohydrates (g)	30%	70.4	57.3	Min
Free sugars (g)	30%	7	5.7	Max
Fibre (g)	30%	6	5.3	Min
Protein (g)	30%	8.5	5.91	Min
Iron (mg)	35%	3	2.1	Min
Zinc (mg)	35%	2.5	2.3	Min
Calcium (mg)	35%	193	157.5	Min
Vitamin A (µg)	35%	175	140	Min
Vitamin C (mg)	35%	10.5	10.5	Min
Folate (µg)	35%	53	35	Min
Sodium (mg)	30%	499	360	Max

Kcal = kilocalories; g = grams; mg = milligrams; µg = micrograms

Calculating the average school lunch

Schedule 5 provides formulas to calculate the energy and nutrient content of an average school lunch for infant and junior learners, both daily and across a menu cycle

The 'provision' of food and drink consists of a selection of mains, sides or accompaniments, desserts and drinks. Learners are encouraged to take up each element to create a complete meal for their school lunch and all elements are to be included in the nutritional analysis calculation other than any supplementary bread provided. The energy and nutrients provided in school lunches estimated to be served to less than 1% of registered learners served with a school lunch are also excluded from the calculations required by Schedule 5.

Food and drinks provided as part of lunchtime provision must be nutritionally analysed using the appropriate method set out in the nutritional analysis guide. The nutritional analysis guide provides details on how to nutritionally analyse school lunches to ensure compliance with the nutrient standards for an average school lunch.

Macronutrients

To note: the advice below stated under 'practical advice' for each macronutrient and micronutrient is stated only as overall general health advice:

Energy

An average school lunch must provide 30% of the total daily energy requirement for primary school-age children, within a 15% daily tolerance and a 5% tolerance over one full menu cycle (1 to 4 weeks):

Nutrient	Percentage of daily requirement	Year 3 to Year 6	Nursery to Year 2	Minimum or maximum
Energy (Kcal)	30%	528 (permitted range on a daily basis is 449 to 607 and over a menu cycle is 502 to 554)	429 (permitted range on a daily basis is 365 to 493 and over a menu cycle is 408 to 450)	15% daily tolerance, 5% menu cycle tolerance

Why the energy standard is important

- Energy fuels children's bodies to function well each day.
- Children need the right amount of energy from a variety of nutritious foods each day to grow, be active and maintain a healthy weight.
- Energy helps children to stay alert, engaged and ready to learn, supporting them to thrive throughout the school day.
- Consuming too much energy can lead to weight gain over time, increasing the risk of ill health both now and in the future.

This standard ensures school lunches provide the right amount of energy to support healthy growth and development, helping children feel their best at school every day.

Sources of energy

Energy from food comes from carbohydrate, fat and protein.

- At least 50% of total daily dietary energy should come from carbohydrate, with no more than 5% of this from free sugars.
- Fat should provide no more than 30%, including a maximum of 10% from saturated fat.
- The rest comes from protein.

Practical advice

- Plan balanced meals that appeal to learners, for example a starchy wholegrain carbohydrate, vegetables and lean or low-fat protein.
- Use standard serving spoons or ladles to assist with appropriate portion sizes. Include foods that offer steady, long-lasting energy to support learners throughout the school day, focusing on ingredients that are satisfying and nutrient-dense.

Where a school is closed on any day of a menu cycle (for example an INSET day or other planned closure) then the food and drink that would otherwise be planned for that specific day of the menu cycle if the school was open, must be included in the overall menu cycle nutritional analysis calculation. This also applies to days when food and drink to mark any religious or cultural occasion is provided as a school lunch. The food and drink that would otherwise be planned for that specific day of the menu cycle must be included in the overall menu cycle nutritional analysis calculation (rather than the food and drink provided to mark any religious or cultural occasion).

Protein

An average school lunch must contain no less than 30% of the total daily protein requirement:

Nutrient	Percentage of daily requirement	Year 3 to Year 6	Nursery to Year 2	Minimum or maximum
Protein (g)	30%	8.5	5.91	Min

Why the protein standard is important

- Protein is a source of energy and is essential for children's growth and repair, helping to build muscle and strength.
- It also supports other key functions, such as immune health and bone health.
- Learners are growing quickly, so getting enough protein is especially important for them.

This standard helps ensure school lunches include a variety of protein sources that support children's satiety, growth, development and long-term health, making every meal a valuable part of their overall well-being.

Sources of protein

Beans, pulses, lentils, fish, eggs, tofu, soya, nuts, seeds, poultry, red meats and other meats.

Practical advice

- Use more beans and pulses – they're low-fat, high-fibre and help learners feel full longer.
- Lean meat, with the fat trimmed and skin removed before cooking, provides a valuable source of protein.
- Don't rely only on cheese for vegetarian meals – mix it up with tofu, lentils, eggs and soya.
- Include a broad mix of protein-rich dishes across the menu cycle to maintain choice and appeal. For lactose-free learners, provide plain plant-based drinks instead of milk.

Fat

An average school lunch must contain no more than 30% of the total daily requirement for fat:

Nutrient	Percentage of daily requirement	Year 3 – Year 6	Nursery – Year 2	Minimum or maximum
Fat (g)	30%	20.5	16.8	Max
Saturated fat (g)	30%	6.5	5.3	Max

Why the fat standard is important

- Fat is an essential part of a healthy, balanced diet in small amounts. It provides energy, supports brain and nervous system health (for example omega-3 fatty acids), and helps absorb important vitamins (A, D, E, K).
- Consuming too much fat over time can impact on children's health, contributing to weight gain and increasing the risk of conditions like type-2 diabetes, some cancers, high cholesterol and heart disease.
- However, reducing the amount of saturated fat and replacing it with small amounts of unsaturated fat can support both immediate and long-term health and well-being.

This standard ensures school lunches provide the right amount and type of fat to support children's immediate and long-term health and well-being, while still delivering meals that are tasty and balanced.

Sources of fat

- Saturated fat – mainly found in animal products such as fat in meat and meat products, butter, cheese and cream. Vegetable fats high in saturated fat include cocoa butter and coconut oil. Chips, pasties, deep-fried foods, pastries, dressings such as mayonnaise, cakes, biscuits, puddings are often high in saturated fat.
- Unsaturated fat – usually found in plant foods such as vegetable oils and spreads, for example olive, rapeseed and sunflower oil. Also nuts and seeds.
- Omega 3 fatty acids – the best sources are oily fish, for example sardines, salmon, mackerel. Other sources include walnuts, flax seeds, linseeds and green leafy vegetables.

Practical advice

- Select ingredients that naturally contain healthier fats to support balanced, nutritious cooking. Swap saturated fats for smaller amounts of unsaturated fats whenever possible.
- Choosing lean cuts of meat, with visible fat trimmed and skin removed before cooking, helps to lower the overall fat content of the meal.
- Opt for healthier cooking methods such as steaming, boiling, baking, or grilling instead of frying.
- Remove excess fat during cooking (for example by skimming it off sauces or stews).
- Avoid adding butter to food (for example vegetables) after cooking.
- Use reduced-fat dairy foods and lean meat options, when possible, such as skimmed or semi-skimmed milk, low-fat yoghurt and reduced fat cheese.
- Skip spread or mayonnaise in sandwiches if the filling is already moist.
- If using a fat spread, choose a reduced-fat version and use it sparingly.

- When buying pre-prepared products or receiving a replacement product, check the ingredients and nutrition labels. Choose options with lower fat. According to the Government's Front of Pack Nutrition labelling scheme:
 - over 17.5g of fat per 100g is high, 3g or less is low
 - over 5g of saturated fat per 100g is high, 1.5g or less is low
 (Note: these are adult guidelines – children should consume even less.)
- Speak to suppliers about the fat content in the products they provide.

Carbohydrate

There are 2 types of carbohydrate: starches and sugars. Starchy carbohydrates should provide the main source of energy in the diet and form the main component of a meal. Gram for gram carbohydrate contains less than half the calories of fat. The fats added during cooking and serving with these foods is what increases the calorie content.

An average school lunch must contain no less than 30% of the total daily requirement for carbohydrate:

Nutrient	Percentage of daily requirement	Year 3 to Year 6	Nursery to Year 2	Minimum or maximum
Carbohydrates (g)	30%	70.4	57.3	Min

Starchy carbohydrates

Why the carbohydrate standard is important

- Carbohydrates are a central part of a healthy balanced diet and our main energy source.
- Foods that contain carbohydrate provide energy, vitamins, minerals and fibre which support health.
- Wholegrain starchy carbohydrates are healthier options because:
 - they digest slowly and are high in fibre, providing lasting energy and keeping children fuller for longer, while supporting their digestive health
 - they are rich in vitamins and minerals, offering more nutritional benefits than refined carbohydrates
 - including them regularly in meals can reduce the risk of conditions like heart disease, certain cancers and type 2 diabetes, and help support a healthy weight, making them a great choice for school menus

This standard ensures school lunches provide the right amount and type of carbohydrates to support children's long-term health, while keeping them feeling full, satisfied and energised, helping them to thrive every day.

Sources of starchy carbohydrates

Cereals (wheat oats, barley, millet, rye), bread of all types, potatoes, yam, cassava, couscous, rice, noodles and pasta.

Practical advice

- Offer starchy carbohydrate options that contribute to balanced, satisfying meals and work well across the menu cycle. Introduce wholegrains gradually if needed, starting with a 50:50 mix of white and wholegrain, then slowly increasing the amount of wholegrain portion over time.

Free sugars

An average school lunch must contain no more than 5% total daily dietary energy of free sugars:

Nutrient	Percentage of daily requirement	Year 3 to Year 6	Nursery to Year 2	Minimum or maximum
Free sugars (g)	30%	7	5.7	Max

Why the free sugars standard is important

- Free sugars are sugars added to foods in any form (like biscuits, chocolate and cake) or naturally found in honey, syrups, fruit juices, smoothies and similar products where the structure of the fruit or vegetable has completely broken down.
- These foods often have little nutritional value, but consuming too much free sugar over time is linked to weight gain, poor dental health and increased risk of health issues such as heart disease and type-2 diabetes. This makes it important to limit their presence in school lunches.

This standard ensures school lunches align with recommendations to reduce free sugar intake, supporting children with tasty, satisfying, healthier choices as part of a balanced diet while normalising desserts as an occasional rather than everyday item.

Sources of free sugars

- Table sugar
- Syrups, honey, jam
- Confectionery, biscuits, chocolate, cake, pastries, sweets, ice cream
- Sweetened yoghurt and milks
- Fruit and vegetables that are blended, pureed, pastes, or juiced
- Sugar-sweetened beverages

Some other common terms used to label sugar are glucose, fructose, beet sugar, cane sugar, dextrose and syrup.

The natural sugars found in milk and in whole fruits and vegetables are not free sugars and do not need to be restricted in the same way.

Practical advice

- Choose whole fruit over sweetened products.
- Serve whole or chopped fruit instead of fruit purées.
- Offer fresh fruit in appealing ways to encourage learners to choose it regularly as part of the meal.
- Replace cakes, biscuits and pastries with:
 - whole fruit
 - fruit-based desserts (for example baked apples, fruit salad)
- Use unsweetened yoghurt and add fresh fruit for flavour.
- Cut down sugar in homemade desserts and sauces.
- Use spices like cinnamon or vanilla to add flavour without sugar.

- Check labels on prepared products. Look for products with 5g or less sugar per 100g (low sugar) and avoid products with more than 22.5g sugar per 100g (high sugar). (These are adult guidelines – children should consume even less.)
- Speak to suppliers and manufacturers. Work with manufacturers to include free sugar on their product specifications so it is easier for you to access the relevant information. Engage with manufacturers and suppliers to source or develop products with lower sugar levels.

Fibre

An average school lunch must contain no less than 30% of the total recommended dietary intake of fibre:

Nutrient	Percentage of daily requirement	Year 3 to Year 6	Nursery to Year 2	Minimum or maximum
Fibre* (g)	30%	6	5.3	Min

* AOAC (Association of Official Analytical Chemists) analysis methods are the standard methodology used in product analysis food labelling for calculating fibre.

Why the fibre standard is important

- Fibre is essential for maintaining healthy digestion and supporting gut function.
- A high-fibre diet also lowers long-term risk of chronic conditions like cardiovascular disease, type 2 diabetes and bowel cancer, making it an important part of every school lunch to support children's health and well-being.
- Many children don't get enough fibre, so small changes in school meals can make a big difference.

This standard supports children to increase their daily fibre intake, which many find challenging, ensuring they stay full and satisfied at school while supporting their long-term health and well-being.

Sources of fibre

- Wholegrains: brown rice, oats, wholegrain cereals, wholemeal pasta and wholemeal bread.
- Potatoes with the skin on.
- Whole fruit and vegetables with skin on.
- Beans, pulses and lentils.

Practical advice

- Add extra vegetables and pulses throughout the menu, such as lentils into sauces for bolognese, curry and chilli.
- Swap white carbohydrates to wholegrain options or start with introducing 50:50 options to help you transition.
- Prepare fruit and vegetables using methods that retain their natural texture and nutritional value. Speak to suppliers about the fibre content in the products they provide and choose products that are higher in fibre. Look for wholegrain or added fibre options.

Sodium (salt)

An average school lunch must contain no more than 30% of the total recommended dietary intake of salt:

Nutrient	Percentage of daily requirement	Year 3 to Year 6	Nursery to Year 2	Minimum or maximum
Sodium (mg)	30%	499	360	Max

Sodium is a component of salt. To convert sodium into grams (g) of salt you need to multiply the sodium value by 2.5.

Why the sodium standard is important

- The cells in our body need a small amount of salt to function properly.
- However, too much salt in children's diets can lead to issues like water retention and raised blood pressure, as well as an increased risk of heart disease, kidney problems and a stroke later in life.
- Reducing children's intake of salty foods not only supports better health outcomes but can also help them develop a preference for less salty flavours.

This standard helps ensure school lunches stay within safe salt limits, encouraging healthier taste preferences and supporting children's health both now and as they grow.

Sources of sodium

Salt is often added during or after cooking. However, most of the salt that children eat is already in the food we buy including bread, cheese, soups and sauces, stock and gravy, ready meals, some breakfast cereals, salty snacks (for example crisps, salted nuts), sausages and cured meats, and condiments.

Practical advice

- Use herbs, spices, garlic and lemon juice to enhance taste instead of salt.
- When possible, prepare meals from scratch to reduce hidden salt often found in manufactured products.
- When using pre-prepared items, check nutrition labels and choose those lower in salt. According to the Government's Front of Pack labelling scheme:
 - more than 1.5g of salt (0.6g sodium) per 100g is high
 - 0.3g of salt (0.1g sodium) per 100g or less is low(Note: these are adult guidelines – children should consume even less.)
- Speak to suppliers about the salt content in the products they provide.

Micronutrients

Iron

An average school lunch must contain no less than 35% of the total recommended dietary intake of iron:

Nutrient	Percentage of daily requirement	Year 3 to Year 6	Nursery to Year 2	Minimum or maximum
Iron (mg)	35%	3	2.1	Min

Why the iron standard is important

- Iron is essential for growing children, supporting muscle development and helping carry oxygen around the body.
- It also plays a key role in maintaining a healthy immune system.
- During periods of rapid growth, like in childhood, iron needs are higher.
- Without enough iron, children may feel tired and low in energy, making it harder for them to stay focused and thrive at school.

This standard helps ensure school lunches make an important contribution to children's iron intakes as part of a healthy balanced diet, supporting children to feel at their best each day.

Sources of iron

- Red meat and offal
- Canned fish
- Eggs
- Plant-based sources of iron, including:
 - pulses and legumes (such as beans, peas, and lentils)
 - dark green vegetables (such as kale and broccoli)
 - nuts and seeds (be aware of all allergies, including nut allergies)
 - dried apricots
 - wholegrains
- Some foods are fortified with iron, such as bread and breakfast cereals.

Practical advice

- Iron from animal sources is more easily absorbed by the body than plant sources but plant sources remain essential, offering important health benefits and contributing significantly to children's overall iron intake.
- Pair plant-based iron sources (like beans, lentils, and wholegrains) with foods rich in vitamin C (such as peppers, citrus fruits, or tomatoes) to help boost absorption.
- Be aware that some foods, like bran-based cereals (high in phytates) and drinks like tea (high in tannins) make it more difficult for the body to absorb iron.
- Use varied, well-chosen ingredients in vegetarian meals so they contribute meaningfully to learners' dietary iron needs. Add iron-rich foods to familiar dishes, for example lamb casserole, spaghetti bolognese, hummus, shepherd's pie and mixed-bean wraps.

Zinc

An average school lunch must contain no less than 35% of the total recommended dietary intake of zinc:

Nutrient	Percentage of daily requirement	Year 3 to Year 6	Nursery to Year 2	Minimum or maximum
Zinc (mg)	35%	2.5	2.3	Min

Why the zinc nutritional standard is important

Zinc is essential for children's growth, tissue repair, wound healing, and supporting a healthy immune system.

This standard ensures school lunches make an important contribution to children's zinc intake, supporting children's growth, immune function and overall health.

Sources of zinc

Red meat, offal (especially liver and kidney), eggs, fish, milk and other dairy products, cereals, soya products, red kidney beans, lentils, chickpeas and nuts (be aware of all allergies, including nut allergies).

Practical advice

- Create vegetarian dishes that use a range of nutritious ingredients to help support learners' zinc intake.
- Add zinc-rich ingredients to popular meals, for example cottage pie, roast pork or beef, lentil bake, brown rice, vegetarian bolognese with soya mince, and crumble toppings with pumpkin seeds.

Calcium

An average school lunch must contain no less than 35% of the total recommended dietary intake of calcium:

Nutrient	Percentage of daily requirement	Year 3 to Year 6	Nursery to Year 2	Minimum or maximum
Calcium (mg)	35%	193	157.5	Min

Why the calcium nutritional standard is important

- Calcium is essential for strong bones, as well as healthy muscle and nerve function, making it especially important for school-aged children who are growing.
- A lack of calcium can lead to stunted growth during childhood and increase the risk of osteoporosis later in life, so it's vital to include calcium-rich foods in school lunches to support children's development.

This standard ensures school lunches make an important contribution to children's calcium intake, supporting their growth, bone development and long-term health.

Sources of calcium

- Dairy products such as milk, cheese and yoghurt.
- Canned fish with bones (for example salmon and pilchards)
- Broccoli and cabbage
- Dried fruits

- Tofu
- Red kidney beans, chickpeas and soya beans
- Fortified plant-based milk drinks

Practical advice

- Low-fat dairy products provide the same amount of calcium as the full-fat versions, making them a healthier choice.
- Include plant-based items that support children's calcium needs as part of everyday meals.
- Add calcium-rich foods to meals, such as cheese and potato pie, salmon quiche, salmon fishcakes, red kidney beans and chickpeas in stews, soups, casseroles and curries, and custard made with milk.

Vitamin A

An average school lunch must contain no less than 35% of the total recommended dietary intake of vitamin A:

Nutrient	Percentage of daily requirement	Year 3 to Year 6	Nursery to Year 2	Minimum or maximum
Vitamin A (µg)	35%	175	140	Min

Why the vitamin A nutritional standard is important

- Vitamin A is essential for healthy vision, especially in dim light, supports the immune system and plays a key role in maintaining healthy skin and tissue.

This standard ensures school lunches provide a valuable contribution to children's vitamin A intake as part of a healthy, balanced diet that supports their vision, skin health and overall well-being.

Sources of vitamin A

- Oily fish, eggs, liver
- Cheese, milk and yoghurt
- Yellow-, orange- and red-coloured fruits and vegetables such as carrots, peppers, apricots, oranges, papaya, mango, butternut squash, sweet potato and tomatoes.
- Dark green leafy vegetables.

Practical advice

- Incorporate foods high in vitamin A into dishes, for example salmon fish cakes, baked sweet potato wedges, red pepper and tomato omelette, carrot and coriander soup and fruit salad.

Vitamin C

An average school lunch must contain no less than 35% of the total recommended dietary intake of vitamin C:

Nutrient	Percentage of daily requirement	Year 3 to Year 6	Nursery to Year 2	Minimum or maximum
Vitamin C (mg)	35%	10.5	10.5	Min

Why the vitamin C nutritional standard is important

- Vitamin C is essential for wound healing, protects cells and helps maintain healthy blood vessels, skin, bones and cartilage.
- It also acts as an antioxidant, protecting children from infections and disease, and helps the body absorb iron more effectively.
- Not enough vitamin C can lead to health issues such as scurvy.

This standard ensures school lunches provide a valuable contribution to children's vitamin C intake, as part of a healthy balanced diet, supporting their overall health and well-being.

Sources of vitamin C

- Fruits – especially citrus fruits (oranges, lemons, limes, grapefruit), berries and kiwi fruits.
- Vegetables – especially broccoli, green and red peppers, potatoes and sweet potatoes.

Practical advice

- Make raw (uncooked) fruit and vegetables available each day as they contain the most vitamin C.
- Prepare and cook food containing vitamin C as close to lunchtime as possible to preserve their nutritional value, as vitamin C is water-soluble and can be lost during cooking.
- Steam vegetables or cook them with minimal water to retain more vitamin C.
- Include appealing ingredient combinations that naturally help boost vitamin C intake across the menu.

Folate

An average school lunch must contain no less than 35% of the total recommended dietary intake of folate:

Nutrient	Percentage of daily requirement	Year 3 to Year 6	Nursery to Year 2	Minimum or maximum
Folate (µg)	35%	53	35	Min

Why the folate nutritional standard is important

- Folic acid is essential for making red blood cells and supporting growth and healthy cell division. In food, it naturally occurs as 'folate'.
- Folic acid deficiency can lead to tiredness, weakness, loss of appetite, weight loss, and digestive issues.
- Including folate-rich foods in school lunches is important to help children stay healthy and energised throughout the day.

This standard ensures school lunches provide a valuable contribution to children's folate intake, as part of a healthy balanced diet, supporting their overall health and well-being.

Sources of folate

- Oranges, green leafy vegetables, green beans, beetroot, broccoli, peas
- Wheat bran and other wholegrain foods, including brown rice
- Fortified breakfast cereals
- Eggs
- Poultry, pork, shellfish and liver
- Yeast and beef extracts

Practical advice

- Prepare and cook folate-rich foods (like leafy greens and lentils) as close to serving time as possible to keep their nutritional value.
- Steam vegetables like broccoli, cabbage, and spinach instead of boiling.
- If boiling is needed, use minimal water and avoid overcooking.
- Add leafy greens at the end of cooking to preserve folate.
- Add lentils, peas, or chickpeas to:
 - spaghetti bolognese
 - shepherd's pie
 - veggie curry or chilli
 - mixed-bean wraps
- Use spinach or kale in:
 - pasta sauces
 - omelettes
 - stews and casseroles
- Offer folate-rich sides and fillings by:
 - including lettuce, spinach or shredded cabbage in sandwiches and wraps
 - serving raw vegetable sticks like cucumber, pepper, and carrot with dips

Basic overview – lunch

Food category	Primary
Vegetables	<p>At least 2 portions of vegetables must be provided each day.</p> <p>At least 6 varieties of vegetable must be provided each week.</p> <p>Vegetables include salad but exclude potatoes.</p> <p>Different vegetables provided as a single portion count as 1 vegetable.</p>
Fruit	<p>At least 1 portion of fruit must be provided each day.</p> <p>At least 4 different types of fruit must be provided each week.</p> <p>Different fruits provided as a single portion count as 1 fruit.</p>
Dessert portion of fruit or vegetables	<p>All desserts must contain or be accompanied by a dessert portion of fruit or vegetables.</p>

Starchy carbohydrates	<p>A portion of starchy carbohydrates must be provided every day.</p> <p>At least 3 types of starchy carbohydrates must be provided each week.</p> <p>At least 1 portion of starchy carbohydrates provided each week must be pasta, noodles or rice containing at least 50% wholegrain.</p>
Bread	<p>All bread (except garlic bread, naan bread, pizza bases, tea cakes and crumpets) provided must be at least 50% wholemeal.</p> <p>Supplementary bread (with no added fat or oil) must be available every day at lunchtime to those learners who want it.</p>

Fish	<p>A portion of fish must be provided at least once each week.</p> <p>At least 1 portion of fish provided every 4 weeks must be oily fish.</p> <p>Fish combined with at least one other ingredient to form a fish product must contain at least 50% fish.</p>
Red meat	<p>A portion of red meat must be provided at least once a week.</p> <p>Red meat must not be provided more than twice a week.</p> <p>For the purpose of these requirements, 'red meat' does not include 'specified meat products'.</p>
Specified meat products	A portion of a specified meat product must not be provided more than once each week.
Processed alternatives to meat and fish	A processed alternative to meat and fish must not be provided more than twice a week.
Beans and pulses	Either beans, pulses or both must be provided as the main source of protein in a non-meat and non-fish school lunch at least once a week.

Potato and potato products	A portion of potato or potato products cooked in fat or oil must not be provided more than twice each week. Where provided, no more than 1 portion may be deep-fried.
Deep-fried or flash-fried or where coating contains oil	A deep-fried or flash-fried food, or where coating contains oil, must not be provided more than once each week.
Pastry and pastry products	Pastry or products containing pastry (whether sweet or savoury) must not be provided more than once a week.
Sweetened baked products and desserts	Sweetened baked products and desserts (not including ambient or chilled yoghurt) must not be provided more than 3 times a week.
Condiments and salt	<p>No salt is to be added to food, or to be made available to add to food, after the cooking process is complete.</p> <p>The portion of any condiment made available to learners must not exceed 10ml.</p>
Confectionery	Confectionery and food containing confectionery must not be provided.
Savoury snacks	Savoury snacks must not be provided.

Exemptions

The Healthy Eating Regulations do not apply to food and drink in the list. However, it is recommended that those organising any events still encourage and promote healthier options in keeping with the requirements and standards under the Healthy Eating Regulations and as part of a whole-school ethos towards healthy eating. Therefore, such food and drink can still be subject to restrictions at the discretion of the local authority or governing body of a school.

Restrictions do not apply:

- at fund-raising events
- when teaching food or drink preparation and cookery skills, provided that any food or drink so prepared is not provided to learners as part of a school breakfast or school lunch
- as part of any medically prescribed dietary requirements (MPDR)
- to learners at a boarding school as part of an evening meal
- to learners on a residential trip
- to learners on the premises of a maintained school that does not provide primary education (for example primary school-aged learners who attend a secondary school for school transition days and for the occasional lesson)

Religious or cultural occasions

The Healthy Eating Regulations do not apply to food and drink provided to mark any religious or cultural occasion other than when the food and drink is provided as a school lunch. When such food and drink is provided as a school lunch, it must comply with the requirements in Schedule 3 but will not be included in the nutritional analysis in Schedule 5. It is recommended that these occasions should be held no more than once per half term. (See paragraph 7.9 of the Nutritional Analysis Guide on how the nutritional analysis for a menu cycle should be carried out when such days fall in the menu cycle.)

Food brought into school by learners, parents or carers to celebrate birthdays

It is recommended that schools develop policies for restricting birthday foods in line with the ethos of the requirements and standards under the Healthy Eating Regulations, for example advising parents and carers that the food will be given to the learners to take home with them at the end of the school day. Schools and governing bodies should consider whether allowing children to bring birthday cake into school is in accordance with the duty to promote healthy eating and drinking.

Special diets guidance

Special diets refer to food and drink provided to meet individual needs not covered by the standard school menu. A special diet could, for example, be requested due to an individual's healthcare need such as:

- a metabolic condition
- a food allergy or intolerance
- a disability or where a learner is neurodivergent

It may also refer to food provided due to a religion or belief.

[The Healthy Eating Regulations](#) must still be complied with where any adjustments are made to the school food offer, unless food and drink is provided as part of any MPDR or unless doing so would conflict with a reasonable adjustment required under the Equality Act 2010.

The Regulations and associated guidance set out the framework within which adjustments can be implemented. Local authorities, governing bodies and schools, as appropriate, should work closely with the learner, their family and any relevant health professionals involved with the care of the learner, to determine the exact nature of any reasonable adjustments in relation to the school food provision. As appropriate where safeguarding concerns arise, local authorities, governing bodies and schools may request medical evidence. Medical evidence must be obtained for food and drink to come within the definition of MPDR.

Making adjustments and interaction with other statutory duties

Making adjustments based on religion or belief

Local authorities and governing bodies of maintained schools have a duty under the Equality Act 2010 not to discriminate, either directly or indirectly, against those with a protected characteristic, which could be because of a religion or belief.

Local authorities and governing bodies should work with the learner and their family to develop inclusive menus and consider any further support or adjustments in relation to the school food provision in line with the requirements in the Healthy Eating Regulations.

Making alternative arrangements for learners with dietary healthcare needs

[Section 175 of the Education Act 2002](#) places a duty on local authorities and governing bodies of maintained schools to make arrangements for ensuring that their functions are exercised with a view to safeguarding and promoting the welfare of children in school or another place of learning. This includes supporting children with healthcare needs, which could be food-related, for example:

- intolerances
- allergies
- coeliac disease
- type 1 diabetes
- metabolic conditions

Adjustments in relation to the school food provision on healthcare basis must be in line with the requirements in the Healthy Eating Regulations (but see below where food and drink is provided as part of MPDR or where a duty to make reasonable adjustments applies).

[The Supporting Learners with Healthcare Needs Guidance](#) is issued under Section 175 to assist schools to consider how they can support learners with healthcare needs.

In making any changes to the standard school food offer, local authorities and governing bodies should consider any risks associated with adjusting the offer to ensure learner safety. This may involve the need for them to seek the advice of registered health professionals where appropriate.

Duty to make reasonable adjustments under the Equality Act 2010

There may be specific instances where the individual needs of learners on roll at a school restrict them from accessing the standard school food offer because of a disability within the meaning of the Equality Act 2010. For example, a learner with complex needs who is neurodivergent and has autism might require a restricted diet.

Under the Equality Act 2010, local authorities and governing bodies are under a duty to make reasonable adjustments for disabled learners to ensure they are not put at a substantial disadvantage in relation to accessing meals where appropriate.

Whether this duty to make reasonable adjustments applies will depend on whether the learner has a disability within the meaning given in [section 6 of the Act](#). The Healthy Eating Regulations apply unless they conflict with a reasonable adjustment required under the Act.

Medically prescribed dietary requirement

The Healthy Eating Regulations do not apply to food and drink provided as part of any MPDR. This means dietary requirements prescribed or recommended in writing for a learner by a registered medical practitioner or a registered dietitian ([The Health Professions Order 2001](#) describes the legal basis for the regulation and registration of dietitians in the UK). A medical practitioner or dietitian may, for example, prescribe or recommend dietary requirements for a learner where there is a need to follow a particular diet due to a medical condition. This could be a need to eat certain foods or to avoid certain foods.

However, it is recommended that where there are MPDR, and those cannot be accommodated under the Regulations, local authorities and governing bodies providing food and drink should continue to encourage and promote healthier options in keeping with the requirements and standards under the Regulations and as part of a whole-school ethos towards healthy eating. Therefore, such food and drink can still be subject to restrictions at the discretion of the meal provider.

The provisions outlined above have been set out in a diagram below. The diagram is an example of where a learner may expect an adjustment and where food and drink provided because of an adjustment may be exempt from requirements set out in the Regulations. However, it is not an exhaustive description of circumstances in which adjustments can be made by local authorities and schools. It should also be noted that some learners may fall into more than one category.

Special diets synopsis

The Regulations apply to all learners. However, adjustments should be considered for the following learners.

- Learners with healthcare needs (for example an allergy or intolerance) – consider duty under section 175 of the Education Act 2002 and how these learners can be supported.
- Learners with a religious or lifestyle diet – consider duty not to discriminate against those with a protected characteristic under the Equality Act 2010, for example food requirements because of a religion or belief.
- Learners with a disability (as per the Equality Act 2010) or learners who are neurodivergent – consider duty to make reasonable adjustments under the Equality Act 2010 for learners with a disability.

The Regulations do not apply to:

- food and drink provided as a reasonable adjustment required to be made to a learner with a disability under the Equality Act 2010, where this conflicts with The Healthy Eating in Schools (Nutritional Standards and Requirements) (Maintained Primary Schools) (Wales) Regulations 2025
- food and drink provided as part of MPDR, supported by written evidence provided by a healthcare practitioner