

# School Food Standards Compliance Pilot: Feasibility Phase 2 Research

Area of research interest: [Consumer Interests \(aka Wider Consumer Interests\)](#)

Study duration: 2023-06-01

Planned completion: 31 July 2024

Project status: Completed

Authors: Verian

Date published: 1 August 2024

DOI: <https://doi.org/10.46756/sci.fsa.gsy115>

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## Executive Summary

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

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

The Department for Education and the Foods Standards Agency, with support from the Office of Health Improvement and Disparities, developed the School Food Standards Compliance Pilot as a novel approach to assuring the School Food Standards. Its purpose was to test if Food Safety Officers could carry out a School Food Standards check (referred to as the 'check') to identify potential non-compliance with the School Food Standards alongside food hygiene inspections. Food Safety Officers are trained professionals and are responsible for inspecting a range of business types at different points on behalf of their local authority. In addition, where potential non-compliance with the School Food Standards was identified, the pilot explored whether appropriate teams within local authorities would be able to support schools. The pilot launched in September 2022 across 18 local authorities that volunteered to participate and has included 3 phases: Discovery, Feasibility Phase 1 and Feasibility Phase 2. The reports on the findings of the [Discovery Phase](#) and [Feasibility Phase 1](#) were published in November 2023.

This report sets out the findings of research that explored the responses of local authorities and schools to the checks, within the final phase (Phase 2) of the pilot. For local authorities, the focus was on how they perceived and responded to the check data provided by Food Safety Officers carrying out the checks. For schools, the focus was on examining their experiences of the checks and understanding the actions and behaviour change they had undertaken to address potential non-compliance.

## Methodology

This report brings together data from four different sources including:

1. A survey completed by a sample of 18 Food Safety Officers who had conducted checks in Phase 2.
2. A survey completed by a sample of 63 schools who had received a check during the pilot.
3. In-depth interviews completed with 27 local authority staff in November and December 2023.
4. In-depth interviews completed with 7 school staff and 6 catering staff completed in June and July 2023.

An important caveat to these findings is that the participating local authorities are unlikely to be representative as they opted into the pilot voluntarily, and so may have had more resource, expertise, and engagement with school food in comparison to other local authorities in England.

## Results

Food Safety Officers reported that the checks were straightforward to administer, and that the changes made to the question sets, guidance and reporting process in the final phase of the pilot helped make the process easier and more efficient. While it is likely that the checks were being applied consistently by Food Safety Officers within a local authority, it is possible that there were inconsistencies in application between local authorities such as how Food Safety Officers defined 'meat products'. Many local authority participants also felt that changes made to question sets due to findings from Phase 1 of the research, as well as the new requirement to rotate them, reduced the quality of the data, as less data was being provided and compliance could not be compared reliably across schools. Schools reported that they were happy to facilitate the checks, and in some cases this acted as a catalyst for them to review their school food provision; however, overall there was inconsistency in the extent to which they acted to address reported instances of potential non-compliance.

In testing the feasibility of an effective response to the checks, significant barriers were experienced by local authorities regarding effectively following up with schools where potential non-compliance was marked by the checks. There were some examples cited by schools and local authorities where this process worked successfully, typically when school staff were supportive and engaged or local authorities had the capacity and capability to provide substantial support (often achieved through having a dedicated team that specialised in school food). However, in many local authorities there were issues regarding communicating both internally and when engaging with schools and caterers. Some local authorities also did not have the resource or expertise to provide support for schools at all.

## Recommendations

There are ways in which the check could be improved, by resolving remaining areas of uncertainty in the questions and ensuring that communication about the check and its results reach catering managers and external catering suppliers. There may be an opportunity to target the check to a greater extent to more efficiently capture instances of potential non-compliance. This targeting could focus on certain types of school being more likely to receive a check (for example, targeting secondary schools, where multiple instances of potential non-compliance were more common), and/or the specific questions asked at each school.

Achieving a consistently effective response to the checks requires overcoming the barriers identified. Given structures and relationships between teams in the local authorities were found to vary, it will be challenging to identify a nationally standardised follow-up process that could be put into practice across all local authorities. Any standardised follow-up process should aim to target the same outcome(s), such as raised awareness of the School Food Standards legal obligations

amongst governors and trustees, but not prescribe a means of doing this. This will help ensure all local authorities would be able to follow this guidance regardless of their specific local structures and models for operating in relation to school food. Given that resource and expertise also varied, additional support may be needed so that all local authorities can fulfil their role in a standardised follow-up process effectively.