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School meal nutrition and procurement policies in England: governance variability and innovation in implementation settings

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Introduction: Healthy, sustainably sourced school meals are considered a means to advance health, environmental, and economic goals within food systems. Achieving these benefits in practice, however, often requires navigating a complex, multi-level policy and governance landscape. In England, two interrelated policy areas that govern school meals are the School Food Standards and public procurement rules. Policy change is needed to improve outcomes, particularly given the lack of implementation provision. To highlight this, the paper introduces the concept of implementation settings to examine how school food policy and procurement are enacted in practice.
Methods: The study draws on a qualitative case study that introduced British-grown beans into primary school meals in two English local authorities. Data were collected through semi-structured interviews with policy actors across national and local government, schools, academies, caterers, and the voluntary sector, as well as from academic literature and policy documents. The analysis focused on diverse governance arrangements within implementation settings.
Results: Findings reveal a fragmented school food governance landscape in England, characterised by diverse arrangements and variable implementation outcomes, as diverse policy actors have been delegated or have assumed differing responsibilities. These dynamics highlight significant governance variability in how national school food policy is enacted, with local innovation and entrepreneurship driving positive outcomes.
Discussion: By foregrounding implementation settings as a critical site of governance, the paper advances understanding of the social, institutional, and contextual conditions that enable or constrain effective school food policy implementation. It further argues that local collaborative innovation offers important but partial pathways forward. Consistently positive food system outcomes also require strong national leadership and structural reforms. The study provides both practical and theoretical insights for those seeking to understand, navigate, and transform institutional food systems governance.

KEYWORDS

school food, policy implementation, nutrition policy, public procurement, governance, neoliberalism, local innovation, food system

1 Introduction

The role that school meals and public procurement can play in transforming food systems has been restated in recent years at a global level by the launch of the School Meals Coalition at the United Nations Food Systems Summit in 2021 [School Meal Coalition, 2023; Food and Agriculture Organization (FAO), Alliance of Bioversity International and CIAT, Editora da UFRGS, 2021]. Given that children consume about 30 per cent of their daily energy intake at school, providing school children state-funded high-quality cooked lunchtime meal can substantially improve diets, support educational attainment and address inequalities (Harrison et al., 2013; Parnham et al., 2023). Moreover, school meals offer an opportunity to drive wider change, especially where procurement can favour sustainable and local sourcing of foods which benefit small businesses and the local economy (Kersley and Knuutila, 2011; Bremner and Osborne, 2025). Supportive government policy is central to ensuring that school food drives these beneficial food systems outcomes through, for example, introducing and updating nutrition standards for school food, and through procurement policy rules and guidance (Swensson and Tartanac, 2020; Parsons and Barling, 2021).

This paper explores the school food nutrition and public procurement policies that govern school food provision in England, and recent developments in these two related policy areas. It looks in some detail at the implementation realities of these polices through a locality-based case study, situated within the wider implications of politics of austerity in English local authorities. Using a multilevel governance perspective, it explores how national frameworks and initiatives are implemented—or not—in local settings, highlighting the diverse actors, mechanisms, and governance processes at play within what we refer to as 'implementation settings'.

The following introductory sections and literature review explain the context for this research. The first section explains our theoretical framing – how public policy making can be reinterpreted, remade or ignored on the ground during the ongoing day to day implementation of the policies. It is followed by a description of current school food provision in England highlighting key actors, policies, governance mechanisms and recent changes. In turn, the research methods are explained, combining analysis of policy documents with evidence from stakeholder interviews at multiple levels – from school staff, Multi-Academy Trusts, local authorities and catering companies, up to government civil servants and national food charities. Our research findings focus on the implementation of policies in practises and a multi-level analysis of where there is innovation to improve implementation. This is followed by a discussion section and recommendations for some key directions and priorities for policy change to realise healthier and more sustainable school meals in England.

1.1 Literature review

1.1.1 Conceptualising public policy implementation governance and practise

Studies of public policy recognise that the implementation of 'policy in practise' is part of an iterative process that can lead to change through reinterpretation, recasting or just non-compliance of the intended policies in question (Pressman and Wildavsky, 1973; Sætren, 2024). Early emphasis in policy implementation research focused on the operational practise of the street level bureaucrat in carrying out and delivering policies (Lipsky, 1980). Indeed, rather than viewing implementation as a separate stage of the public policy process, studies found that a more fluid and dynamic understanding is required, stretching the making of policy to the practise level of day to day on the ground actions (Durose, 2011; Sager and Gofen, 2022; Sætren, 2024). Studying the decisions and actions of ground-level policy actors led to identification of local level innovation and policy entrepreneurship, and a shift to understanding the viewpoints of those actors involved in policy implementation practises (Tummers et al., 2015; Boswell and Corbett, 2015; Arnold, 2021).

More recently, improving the design of policy has been an analytical focus to enhance policy implementation in public sector organisations (Hudson et al., 2019; Capano and Lepori, 2024). The range of actors involved in policy delivery has also become more visible in recent decades, beyond public sector organisations, emphasising the operation of public policies from the state as shifting from governing to governance (Moran, 2003). That is, the state directing the implementation of policy through networks of state and non-state actors rather than primarily through line-managed bureaucracies, complementing changes taking place in public administration under the new public management credo of the central state – '*steering not rowing*'. The growth of the contemporary state marked an increase in regulatory policies, away from more costly distributive or redistributive policies (Majone, 1994; Moran, 2003). The conceptualisation of the regulatory state signified the shifting of the burden of action, compliance and, importantly, costs to the private sector and professions. Yet this should not be seen as merely nonstate actor networks interacting. The state and its policies remain a core feature of this governance, but with a wider set of actors enrolled into policy delivery (Bell and Hindmoor, 2009). The reach of the state extended through auditing of compliance to regulation by private companies, public institutions, professions and civil society alike (Power, 1997). Furthermore, such governance occurs at multiple levels (national, regional-local, and in some cases international), again highlighting the dynamic and interactive nature of policy development across these levels. The public policy and governance relationship and multi-level governance approaches were applied as a framework to understand the dynamics of Britain's food policy (Lang et al., 2001; Lang et al., 2009); and have become more prevalent in local food systems and policy research (Lever et al., 2019; Parsons et al., 2021; Monticone et al., 2023; Yapp, 2023) and in broader cross-national food systems transition literature (van Bers et al., 2019; Béné and Abdulai, 2024).

This research applies a public policy and governance conceptual lens to examine key 'implementation settings', the specific contexts in which decisions about school meals and their procurement are made and enacted. It explores how the overall national policy direction and ongoing policy developments at the macro level are interlinked with and related to the actions and inactions occurring within these settings. The term 'implementation settings' is introduced to capture both the sites of decision-making and the contextual factors that shape those decisions in the day-to-day governance of procurement practises and school nutrition standards. This conceptualisation parallels Lever et al.'s (2019) rethinking of 'place' in local food governance—not merely as a fixed physical location, but as a dynamic and relational space where diverse actors and processes interact. Both 'place' and 'implementation settings' are conceptual arenas where policy is negotiated, and practise is shaped.

Literature on school food policy implementation in the United Kingdom acknowledges variability in compliance, but this is

typically examined in relation to differences between the devolved nations. Scotland, Wales, and Northern Ireland appear to have more effective policies and stronger mechanisms for implementation, monitoring, and compliance. This is partly because school meal provision in these nations is more centralised and adherence to statutory standards is more closely integrated into service delivery. In addition, state-funded schools in these nations remain under local authority control, unlike in England (Adamson et al., 2013; McIntyre et al., 2022; Furey and Woodside, 2022; Lalli et al., 2024). Other UK studies also link policy compliance to health and dietary outcomes (e.g., Pallan et al., 2024a; Pallan et al., 2024b).

The wider literature underscores the global scale of the challenge. Matela et al. (2023), for example, report poor school food policy implementation across Europe and the Western Pacific but show that "hand-holding" schools in the initial years of implementation through capacity building, robust monitoring, and periodic evaluations, significantly improves adherence. Ronto et al.'s (2020) meta-synthesis of 28 studies from various countries identifies barriers and facilitators to effective school food policy implementation. These papers, whilst emphasising the technical challenge of compliance and the implications of poor compliance, focus less on the ideological and structural contexts shaping these policies and their implementation. They also focus less on the innovative role of diverse actors and mechanisms especially in English local authorities, catering companies and schools in driving innovation and improving compliance and therefore, health and dietary outcomes.

1.1.2 Policy context: England's contemporary school food policy and public procurement framework

National policy governing English school food provision dates to The Education (Provision of Meals) Act, 1906. The current policy framework for school food provision was recast in 1980, when under prime minister, Margaret Thatcher, the Conservative government introduced the Education Act (1980) which removed the obligation to provide school meals, except for pupils from households receiving benefits. The Act also devolved nutrition standards to local authorities and encouraged packed lunches to reduce budgets, prevent wastage and permit parental choice over meal preferences (Finch, 2019). National school food nutrition standards were only re-introduced in 2001. In 1988, the Conservative government opened school food provision to the private sector through compulsory competitive tendering (CCT), whereas it had previously been provided solely by local authorities (Morgan, 2004, 2025). Although the subsequent Labour government replaced CCT with the Best Value regime in 1997, this still retained competition and 'value for money' as core principles.

The 2023 Procurement Act, which came into effect in February 2025, however, should modify these guiding principles. This post-Brexit legislation introduces the Most Advantageous Tender model, enabling procurers to consider values beyond cost in contract awards (Cabinet Office, 2023). It also encourages small and medium sized enterprises (SMEs) and voluntary, community, and social enterprises (VCSEs) to engage more fully in public procurement through reserving lower-value contracts and simplifying tendering processes (Cabinet Office, 2024). Covering all public goods, services, and works, including local authority food procurement, the Act now legally permits English public food procurement to align with wider goals of local economic and environmental sustainability (Swensson and Tartanac, 2020). Another core piece of procurement legislation is the Government Buying Standards for Food and Catering (GBSF), introduced in 2011 and overseen by Department for Environment, Food and Rural Affairs (DEFRA) and the Department of Health and Social Care (DHSC). The GBSF sets standards for food production, processing, nutrition, resource efficiency, and socio-economic aspects (Cabinet Office, 2014). Compliance is mandatory across the public sector although not for schools despite the fact that education settings account for around 60 per cent of UK public food procurement, with English schools spending £2.1 billion annually of the £5 billion government food and catering budget (Environment, Food and Rural Affairs Committee (EFRA), 2021; Crown Commercial Service (CCS), 2023; Quince, 2024). The DfE nonetheless encourages schools to comply and to prioritise local, seasonal, and higher-welfare food (Department for Education (DfE), 2025a).

The rapidly accelerating 'academisation' of schools begun by the Labour government in 2000 is another political process that affects the governance of English school meal policy implementation. Academies are a type of state-funded school in England that unlike other state schools are independent from local authority oversight, with greater autonomy over their budgets and curricula. These are overseen by charitable trusts that often manage groups of schools in a Multi-Academy Trust (MAT). From only 203 in 2010, by 2025 there were 10,770 academies, out of England's 22,000 state schools (Pennington et al., 2024; Public Sector Network, 2024). MATs are, therefore, increasingly powerful players in shaping school food provision, especially since they often consolidate catering provision across academies with a single provider for cost efficiency, simplified oversight and alignment to Trust values (Education Policy Institute, 2017; BESA, 2019).

The 2013 *School Food Plan*, an independent review commissioned by the DfE, has strongly influenced English school food policy in recent years. It led to a revision of the National School Food Standards (SFS) and the introduction of Universal Infant Free School Meals (UIFSM) for pupils in Reception to Year Two (ages four to seven), alongside existing means-tested free school meals (FSM) for older children. These are key aspects of school meals that can be guided by policy: the former updating and simplifying mandatory nutrition standards, with the intention of making them easier to implement and the latter extending access to free school meals to reduce inequalities (Parnham et al., 2022a). These policies are mandatory for all state-funded schools in England, including local authority-maintained schools, academies, free schools, and special schools. In 2025, the Labour government also introduced an SFS-compliant Free School Breakfast initiative in England [Department for Education (DfE), 2025b]. As noted above, English school food procurement is encouraged to follow sustainable procurement guidance as outlined in the GBSF but is not governed by any specific public procurement principles beyond the general public-sector procurement framework, which includes consideration of social value. The School Food Standards (SFS) are thus the only mandatory regulations specific to school food across all four UK countries. However, the devolved nations set their own nutrition standards and have distinct criteria for free school meal pricing and eligibility, public procurement regulation and mechanisms to support local procurement. Given these national differences and the fact that the other devolved nations operate solely public sector school meal provision, this paper focuses primarily on England. See Table 1 for an overview of contemporary English school food policy discussed in this article.

TABLE 1 Relevant policy for English school food and procurement, 2025.

Policy mechanism	Legal/Policy basis	Department responsible	Implementation mechanism	Monitoring and compliance	Status (2025)
School Food Standards (SFS)	The Requirements for School Food Regulations, 2014	DfE	Guidance available on DfE website. Online governor training.	School governors and trustees responsible for compliance. Pilot with FSA & Local authorities (2022–2023); menu and kitchen checks added to hygiene inspections.	Pilot completed; feasibility report recommends improved accountability and support to enable improvements (Verian, 2024). Labour government announces review of the School Food Standards (June 2025). Lack of clarity whether this includes measures for implementation.
Government Buying Standards for Food (GBSF)	Introduced in 2011 as part of Greening Government Commitments; Sustainable Procurement policy. Applied in line with UK Public Contracts Regulations, 2015.	DEFRA; DHSC (for nutrition standards)	DfE encourages schools to adopt standards voluntarily	No routine monitoring or compliance mechanisms.	Consultation (2022) and independent review (Quince, 2024) recommend update to include schools. Labour manifesto pledge for local and sustainable sourcing targets. Research to establish baselines for local, sustainable sourcing (January 2025).
2023 Procurement Act	2023 Procurement Act	CCS/Cabinet Office	Guidance for public procurement teams. Introduces Most Advantageous Tender assessment model to allows contracts based on quality and social value, not just lowest cost.	New Procurement Review Unit (PRU) responsible for oversight.	Came into force in February 2025.
Buying Better Food and Drink Agreement (BFF)	See GBSF.	CCS/Cabinet Office	Online platform to help public procurement buyers apply the GBSF and facilitate SME, local supplier procurement.	Open to public sector buyers; not specifically monitored.	Launched late 2024.
Universal Infant Free School Meals (UIFSM)	Children and Families Act 2014, Section 106	DfE	Funded through Dedicated Schools Grant (DSG).	Funding based on per-meal rates; schools self-manage.	Ongoing: £2.61 per eligible meal for 2025–26
Means-tested Free School Meals (FSM)	Education Act 1996, Section 512	DfE	FSM Supplementary Grant.	As above.	Ongoing for eligible pupils from Year 3 onwards. Same rate as UIFSM. June 2025 – extension of FSM to households in receipt of Universal Credit.
Universal Free School Breakfasts	DfE initiative; proposed in 2025 Children's Wellbeing and Schools Bill.	DfE	Breakfasts must meet the SFS; available before school.	Early Adopter Scheme with 750 English schools; DfE monitor through data collection and school feedback.	Pilot in progress (May 2025); bill progressing

The formal framework for English school food policy and procurement spans multiple levels and involves both public and private actors. DEFRA oversees national food and agricultural policy, whilst the Department for Education (DfE) manages school food policy, with additional roles held by the DHSC, the Treasury, and, more recently, Crown Commercial Services (CCS). The DfE also oversees eligibility and funding for free school meals (both UIFSM and means-tested FSM) and sets annual funding rates, although these are not linked to inflation. Schools and Academy Trusts receive funding through two grants, but this is not ringfenced solely for school meals. They may contract with local authority caterers or external private providers, ranging from in-house teams to national catering firms. Where external providers are used, the DfE advises specifying the SFS in contracts and service agreements to ensure compliance and accountability [Department for Education (DfE), 2025a]. However, free school meal funding levels fall short of the real costs of provision and contract prices, requiring local authorities, schools, and MATs to find additional funds. See section 3.3 for more discussion.

Procurement practises differ by provider type. Local authority caterers usually purchase through pre-negotiated frameworks managed by procurement teams often with support from regional professional buying organisations (PBOs), which oversee due diligence and supplier vetting. Private and in-house caterers manage their own supply chains. Whilst local authority caterers remain under local authority oversight, MATs and private caterers operate independently of this control. Catering arrangements also vary: meals may be cooked on-site, in neighbouring schools, or in centralised kitchens, and are either freshly prepared or blast-frozen and reheated (Sabet, 2022).

1.1.2.1 Recent national efforts to improve English school meal provision

The 2022 Conservative government *Levelling Up* White Paper acknowledged uneven school food provision as a barrier to equal opportunities and proposed new measures, including compliance mechanisms, school food plans, and training for governors [Department for Levelling Up, Housing and Communities (DLUHC), 2022]. Although not included in subsequent legislation, several proposed initiatives have since been introduced through other routes. In 2023, the Department for Education (DfE) launched a pilot with the Food Standards Agency (FSA) to trial a new approach to monitoring compliance with the School Food Standards (SFS). FSA food hygiene inspectors typically conduct unannounced visits to schools every 18 months to 2 years. They added a short assessment of school menus during these visits, focusing on key food categories such as fruit, vegetables, whole grains, oily fish, and processed meats. The pilot found this approach could flag compliance issues but highlighted challenges around follow-up, weak accountability structures especially with schools and caterers that did not fall under local authority oversight. A final report highlighted also need for additional funding for local authorities to support with ensuring compliance [Kantar Public, 2023; Verian, 2024; Food Standards Agency (FSA), 2024]. The DfE has also updated guidance for governors and trustees, offering online training and encouraging schools to adopt whole-school food policies [Department for Education (DfE), 2025a; NGA, 2024]. Ofsted, the school inspectorate for England, now also places greater emphasis on food culture and ethos, with inspectors asking detailed questions about food provision, leadership, and education [Department for Education (DfE), 2025c].

To support sustainable procurement, Crown Commercial Services (CCS), which oversees central government procurement, launched the Buying Better Food and Drink Platform in 2024 to facilitate the practical implementation of the 2023 Procurement Act. This online portal enables dynamic procurement, allowing local authorities to source directly from smaller producers and local suppliers alongside existing frameworks. Although currently representing only a small proportion of total public spend, it signals a new role for CCS as a national actor supporting school food procurement, delivered in partnership with private sector partners including procurement specialist Entegra and software developer Equilibrium Markets (Crown Commercial Service (CCS), 2024). This new CCS infrastructure is well placed to support the incoming Labour Government's *"mission-driven approach to public procurement"* following its manifesto pledge for 50 per cent of public sector food to be sourced locally and/or sustainably (Cabinet Office, 2024). In January 2025, the government introduced a system to monitor the origins of food purchased across the public sector; a first step towards fulfilling this pledge by establishing a baseline to expand UK-based sourcing [Department for Environment, Food, and Rural Affairs (DEFRA), 2025].

2 Materials and methods

The research presented here was conducted as part of the BeanMeals study which ran from 2022 to 2024 and was funded as part of the United Kingdom Research and Innovation (UKRI) Transforming UK Food Systems Programme. BeanMeals was food systems research project designed to explore systemic innovation in the food system from 'fork to farm' (Ingram et al., 2025). The project centred on the introduction of two new common bean varieties, bred specifically for UK conditions, into school and home meals. Between February and July 2023, the beans were incorporated into healthy school meals in six primary schools in Leicester and Leicestershire through two public sector caterers, alongside an educational programme for schools, caterers, and children delivered by the UK charity, The Soil Association Food for Life (FFL) (Ingram et al., 2025).

The BeanMeals research examined how the English school food procurement system might support the scaling up of pulse production and consumption in the UK. Pulses and public procurement are both frequently cited as having potential to drive positive food system outcomes and thus form an evident pairing for research into food systems transformation (Djojosoeparto et al., 2025). The BeanMeals food systems model therefore embraced the internationally recognised proposition that public procurement can be a powerful driver of change in school meal provision (School Meal Coalition, 2023). This research offers a case study based on the introduction of beans into schools in two English local authorities. However, the beans also serve as a proxy for the introduction of any healthy, environmentally positive, minimally processed ingredient into English school meals (Ingram et al., 2025).

2.1 Data collection and analysis

This research draws on a range of data sources, including policy documents, NGO reports, press releases, and transcripts of parliamentary debates. The research included 27 semi-structured interviews conducted between January 2023 and March 2025, involving 31 participants. Four interviews included two participants together (e.g., two school cooks, a head teacher and a MAT CEO). Follow-up

interviews with four key participants were conducted to capture shifts in the political context around school food provision, resulting in a total of 31 interview events and 35 participant appearances.

Interviewees were purposively selected from across all relevant decision-making levels, from schools to local authorities, elected officials, public and private caterers, suppliers, charities, non-governmental organisations (NGO)s, and central government departments. These were identified with support from stakeholders working with Leicester and Leicestershire local authorities, and national organisations. See Appendix 1 for a list of anonymised interviewees, referred to in the paper by their self-validated job area and interview date. This indicates which interviews involved several participants and which were repeat interviews.

Interviews were conducted online or in person, following initial contact via email. Interviews lasted between 30 and 60 minutes. These were transcribed using MS Teams, whilst in-person interviews were recorded and transcribed by the researcher. A semi-structured topic guide—developed from a literature review and pilot interviews with BeanMeals stakeholders—ensured consistency whilst allowing flexibility across interviews. Each interview began with an introduction to the BeanMeals project. The beans were introduced as both a practical intervention and conceptual provocation, prompting critical reflection on the ease (or difficulty) of incorporating locally sourced, innovative ingredients into school meals. The topic guide covered six areas: designing school menus; the public procurement system and decision-making around sourcing; observations about how school meal provision had changed over time; identifying key actors in supporting, designing, and implementing school meal provision; wider understanding of relevant policies; and the extent to which the current English policy framework can deliver healthy, sustainable school meals. Open-ended questions encouraged free-flowing conversation to capture the complexities of policy decision-making and implementation (Brinkmann, 2023).

The interview data were analysed using a thematic analysis approach (Braun and Clarke, 2006). An initial coding framework was developed from the topic guide whilst inductive coding was used to identify unanticipated themes and insights. Coding was undertaken in NVivo, with both deductive and inductive codes refined iteratively and clustered into broader themes through constant comparison. Published literature and policy documents were identified through targeted searches of academic databases, government websites, and grey literature. These were integrated with interview findings through iterative coding and comparison to enable triangulation. This ensured that findings were systematically explored through multiple sources, beyond interview to strengthen and contextualise our findings thus highlighting both distinctive and representative aspects of our locality-based case-study. This combined strategy reflects grounded theory principles of inductive theme development and comparison across data sources, whilst remaining situated within a thematic analysis framework.

3 Findings

3.1 England's school food policy: implementation settings and governance

This findings section opens with insights from interviews, supported by literature, showing how the evolution of England's school meal policies, procurement, and governance has led to significant variability in implementation, with schools often inconsistent in complying with the SFS and GBSF.

3.1.1 The school food standards and (non) compliance

The SFS are the mandatory set of standards that explicitly seek to promote societal goals through school meals, sitting alongside broader procurement regulations that encourage consideration of social value in public sector spending. They are managed by the DfE, unlike other areas of public food procurement regulation, which fall under the jurisdiction of DEFRA and CCS. The current SFS are food-based standards (specifying foods to be included, restricted, or excluded) introduced through the 2014 *Requirements for School Food Regulations* and taking effect in 2015 for all state-funded schools. Schools are guided to implement these through an online practical guide available on the DfE website [Department for Education (DfE), 2025a].

The SFS have improved the nutritional quality of school meals, which are now significantly healthier than most packed lunches (Haroun et al., 2011; Stevens and Nelson, 2011; Pearce et al., 2013; Parnham et al., 2022b). However, many school food campaigners argue that the current standards are only a minimal baseline for promoting children's nutrition. They also require updating in line with the 2015 guidance from the Government's Scientific Advisory Committee on Nutrition (SACN), which includes recommendations to increase consumption of foods such as pulses to boost dietary fibre intake [Scientific Advisory Committee on Nutrition (SACN), 2015; Food charity policy advisor, 21/04/23; Food charity director, 8/6/23]. The nutrition standards of the Government Buying Standards for Food and Catering (GBSF), which apply public sector food procurement apart from schools, were already revised in 2021 to align with SACN guidance. Despite ongoing calls from NGOs and within government to update the SFS and ensure coherence across dietary policy, this did not happen under the Conservative government (School Food Review, 2023). Interviewees could offer no explanation although speculated that the government was prioritising efforts to improve compliance (Former local authority caterer, 04/10/23; Food charity policy advisor, 21/04/23). In June 2025, the new Labour Government announced that it was "*acting quickly with experts across the sector to revise the School Food Standards.*" [Department for Education (DfE), 2025e].

There is widespread evidence for poor and inconsistent compliance (Parnham et al., 2023; Peirson-Hagger, 2024). The national food charity, The Soil Association Food for Life (FFL), is the only third-party organisation that routinely monitors individual school compliance as part of its own voluntary standards. They estimate that 60 per cent of English schools are non-compliant (Food for Life, 2019). Subsequently, a 2022 Food Foundation report estimated that only 25 per cent of English schools were committed to meeting the standards (Goudie and Hughes, 2022), and a 2024 study of 36 English secondary schools, found that none were fully compliant (Pallan et al., 2024a). There are various reasons for non-compliance, although central is that the SFS were introduced in 2015 without monitoring and accountability mechanisms and no formal programme to support schools and caterers with implementation. This means that the SFS operate, in effect, as just guidance (Parnham et al., 2023; Peirson-Hagger, 2024; Matela et al., 2023). Project workers for FFL (27/01/23; 20/06/23) clarify that non-compliance is usually around more

challenging aspects of provision such as serving oily fish once every 3 weeks, which is expensive with low uptake (Peirson-Hagger, 2024). Not all cases of non-compliance are necessarily negative, given certain anomalies in the SFS. For instance, several interviewees highlighted examples of schools adopting entirely vegetarian menus, which technically contravene the requirement to serve a portion of meat or poultry at least three times a week (Local authority caterers, 09/02/23; 02/03/23; 20/06/23).

Non-compliance also often arises from efforts to make meals more 'child-friendly'—that is, increasing fat, salt, and sugar content to appeal to children's palates and encourage uptake (Sustainable Food Coordinator, 05/01/23; Food for Life manager, 27/01/23). The reasons for this are complex. For example, caterers reported that post-COVID, children had become more conservative in their food preferences, likely due to increased exposure to processed convenience foods at home—a trend observed in the literature (Gallagher-Squires et al., 2023). This shift has made pupils less familiar with, and more reluctant to try, traditional homemade school meals such as cottage pie (Local authority caterers, 20/02/23; 13/03/23; 20/06/2023). Cooks in several schools reported serving baked beans daily to ensure that some fussy children would at least eat something, despite the SFS permitting them only once a week. This practise was particularly noted in areas of deprivation, where lunch may be a child's only substantial meal of the day. (School cooks, 16/03/23; 06/05/23; Kantar Public, 2023). The lack of effective oversight has given rise to an 'implementation quandary'. As one headteacher noted, *"I feel torn between the immediate need to ensure children eat, even if it's not the healthiest, and the long-term goal of promoting healthy eating habits…given the lack of oversight I feel obliged to prioritise the former, but it conflicts with my role as an educator."* (10/03/23).

Several interviewees also expressed concern that some contract catering companies were deliberately serving menus non-compliant with the SFS and higher in fat, salt and sugar to boost meal uptake and maximise profit (Sustainable food coordinator, 05/01/23; public health consultant, 02/03/23; senior local authority catering manager, 13/01/25). A 2022 Food Standards Agency (FSA) report supports anecdotal evidence that school compliance became less consistent after transitioning from local authority to private catering provision (Kantar Public, 2023). Nixon et al. (2025) note the need for urgent and robust research to identify whether there is a link between types of school meals contracts for food procurement with the quality of food provided and health and academic outcomes for school children.

3.1.2 School food and the government buying standards for food and catering (GBSF)

The GBSF was last updated in 2014, with nutrition standards revised in 2021. In 2022, DEFRA launched a consultation to revise the welfare and sustainability standards, including ambitious targets for local and environmentally sustainable sourcing, although no updates have been implemented to date [Department for Environment, Food, and Rural Affairs (DEFRA), 2022]. There is cross-party support for increasing local sourcing in public procurement and regular NGO calls to update and reform the GBSF (FFL Policy Advisor, 21/04/23). In 2024, the Quince Review, an independent review on local food procurement commissioned by DEFRA, called for a single set of procurement standards to become mandatory across the whole public sector including schools (DEFRA local procurement researcher, 10/04/24; Quince, 2024).

Since its introduction in 2011 there has also been no routine monitoring of the GBSF and there is little evidence of its influence on public procurement (Quince, 2024). Given the lack of monitoring and compliance measures, there is also little incentive for caterers to adopt or adhere to the standards where not explicitly introduced into school tenders. This view was supported by interviewees, two local authority catering managers had not heard of it and another senior local authority caterer noted, *"I do not use it really, it's not something that's routinely used now"* (20/02/23; 13/01/25).

3.2 The school food standards and procurement: innovation in implementation settings

Given the absence of clear implementation mechanisms in national policy, the enactment of school food policy, procurement, and provision takes highly variable forms, with compliance uneven across settings. Yet these settings also offer spaces for policy innovations and reinterpretation through 'on the ground' practises. The actors involved vary across implementation settings and include local authorities, schools, MATs, and both public and private sector caterers. This section reviews innovations led by these diverse actors based on our empirical research.

3.2.1 Innovation within local authorities

Local authorities have a varied approach to oversight of school meals – from active intervention to none (Kantar Public, 2023). They are only directly involved in provision where schools or academies use local authority caterers, in which case they can proactively ensure meals comply with SFS. Leicestershire Traded Services (LTS), the Leicestershire local authority caterer, designs school menus with the local Nutrition and Dietetics Service (LNDS) to ensure compliance, although not every local authority offers a similar service (Public health consultant, 02/03/23).

Similarly public health sits within local authority jurisdiction in England, and public health teams can take initiatives that not only ensure SFS compliance but also encourage healthier and sustainably sourced school food provision in local authority schools and through local authority caterers. One route taken by Leicester and Leicestershire public health teams has been to commission the charity, FFL to work with schools and public sector caterers (Public health consultants, 12/02/23; 02/03/23). FFL have their own voluntary standards for schools and caterers that are more ambitious than the SFS. Compliance at lower award levels is monitored through a checklist completed by schools with supporting evidence, whilst external visits and routine verification are carried out for the highest "Gold" award in schools (Food for Life coordinator, 20/06/2023; Food for Life, 2025). However, this approach has not been widely adopted by many English local authorities; only six FFL commissions were recorded in England in 2025. Local authority interviewees explained that it was difficult to demonstrate measurable progress in schools to meet award criteria, making it hard to justify the associated costs to council budgets. This challenge was not limited to the FFL awards but also reflected wider changes in school staffing, where improvements in food culture were often undermined by high turnover. When cooks, headteachers, or teaching assistants left, their expertise and investment in training were lost (Public health consultants,12/02/23; 02/03/23).

In the absence of mandatory national sustainable procurement policy, local authorities themselves have innovated to incorporate local sustainable food procurement into school food. This includes within public sector school catering services, where interviewees noted that sustainability work is usually driven by a committed individual or small team pro-actively seeking local suppliers and working with procurement teams to make tenders accessible (Former local authority caterer, 04/10/23; Love British Food, 2022; Wilkinson et al., 2024).

Interviewees at LTS highlighted the work of one pioneering senior catering manager that had encouraged the service to adopt FFL's voluntary caterer standards, Food for Life Served Here (FFLSH) which run alongside the individual school awards (Food for Life, 2025; Sustainable food coordinator, 05/01/23; Food charity programme manager, 27/01/23). LTS, which contracts with 240 primary and secondary schools, academies and MATs across Leicestershire, Leicester, Birmingham, Cambridgeshire and Luton, achieved a FFLSH Gold award in 2017. This award requires producing locally sourced, seasonal, and freshly prepared healthy meals incorporating at least 15 per cent organic ingredients and 5 % ingredients sourced to high ethical and environmental standards, alongside food education activities.

More widely, in 2011, Leicester City Council introduced its own sustainable food procurement policy for all council procurement (City Councillor, 07/03/23). Public health teams in both Leicester and Leicestershire have also developed food plans with dedicated officers to better coordinate sustainable food sourcing within the local authority by establishing local food partnerships that map local stakeholders across the food system, including local farmers and growers. This is backed by the national charity funded network, *Sustainable Food Places*, which provides training, guidance, and its own tiered award scheme (Sustainable Food Places, 2024). The Sustainable Food coordinator within the Leicestershire public health team, has collaborated with both the FFL commission and local authority caterer to encourage local, sustainable procurement within county schools (21/11/23). Within the local authority, other actors that can promote initiatives on public procurement include Sustainability or Climate action teams, although their scope and staffing vary widely depending on local priorities, political leadership, and budget constraints (Local authority environmental education coordinator, 24/01/23; City councillor, 07/03/23).

Local authority caterers nevertheless highlight that there are challenges engaging Council procurement teams, given the bureaucratic complexity and the legacy of the lowest cost-based procurement culture. Several noted that procurement teams did not understand the value of local procurement and that they buy hundreds of items, *"for some, buying vegetables is no different from buying office equipment"* (Local authority caterers, 09/02/23; 20/02/23). In addition, procurement officers tended to be path-dependent, preferring established procurement routes: *"Everyone is so time poor in the Council … You'd have to be pretty enthusiastic to start a new procurement exercise given the long timeframes and limited capacity"* (Senior local authority catering manager 24/01/23).

One senior local-authority catering manager (13/01/25) expressed interest in exploring dynamic procurement to work with SMEs and local suppliers, although felt unlikely to use the CCS Buying Better Food online platform, citing the administrative burden for the catering team of running mini-competitions and contracting directly with small suppliers. They were, however, piloting another dynamic procurement mechanism, with software also developed by Equilibrium Markets. The software allows them as caterers to establish sourcing criteria to include small sustainable producers, but with their main wholesaler handling contracts and logistics rather than the local authority itself (AgileChain, 2025). Although dynamic procurement is widely touted as a tool for transforming public procurement, other research highlights similar practical, legal and commercial complexities that must be addressed to fulfil this potential (European Commission, 2021). These include legal issues around regulatory compliance and supplier liability, and commercial aspects such as entrenched practises, limited supplier capacity, and additional costs of integrating digital systems (Wilkinson et al., 2024; Keech et al., 2025).

Another uncommon but potentially transformative structure for local authority ownership offers a means to sidestep the unwieldy bureaucratic nature of public procurement, whilst maintaining public oversight. This model involves establishing public sector caterers as separate legal entities wholly or partly owned by local authorities, rather than operating as internal council departments. Local Authority Trading Companies (LATCs) or arms-length external organisations (ALEOs) allow greater flexibility in procurement by operating outside standard local authority procedures, whilst still enabling a degree of public accountability. A leading example is CATERed, a co-operative Community Interest Company (CIC) jointly owned by Plymouth City Council and local schools. This structure enables CATERed to simplify local, sustainable food sourcing, reinvest profits into service improvements and remain competitive, with continuing public oversight (Plymouth City Council, 2025).

Local authorities in England, however, have no formal oversight to influence or monitor food provision in schools or academies that choose contract or in-house caterers – as one public health consultant noted, *"this leaves a considerable oversight gap because we simply do not know what is going on in those canteens"* (02/03/23). One local authority, has nevertheless, found a means to influence this type of school food provision, by attaching conditions to discretionary funding. The London Borough of Southwark has no public sector catering service and so local schools all have contracts with external providers. Before the introduction of nationally funded UIFSM in 2014, Southwark used internal budgets to provide free meals to all primary school children. This enabled them to attach additional requirements for private caterers receiving the funding including: offering only water to drink, ensuring healthy dessert options and paying catering staff the London Living Wage (School food transformation officer, 08/04/25). Southwark has also introduced a ground-breaking School Food Transformation Programme, supported by a dedicated school food team working in schools, to monitor compliance and support improvement (Southwark Council, 2024a). Alongside this, it also introduced in 2025 a £4 million school food procurement framework as a mechanism to steer private caterers towards local sustainable procurement. Private caterers can now access any supplier contracted by Southwark Council and purchase approved goods directly through the council's system, removing the need to run separate tenders. This framework offers good value for private caterers by reducing administrative overheads, ensuring compliance with the borough's social value and quality standards, and providing access to a vetted pool of local suppliers offering competitive bulk-purchase rates (Southwark Council, 2024b; Sustain, 2024; School food transformation officer, 08/04/25). This level of influence, oversight and innovation in Southwark is however highly unusual. It is made possible by a combination of a long-term political commitment to school food, access to additional local authority and

charitable funds, and small and declining school-age population in the borough (School Food Transformation officer, 08/4/25).

Several interviewees highlighted the proactive approach taken by Scottish local authorities towards monitoring and implementation of Scottish school food standards and procurement regulations (Policy advisor 21/04/23; FFL Scotland, 09/01/23; FSA, 24/03/23; FFL coordinator, 20/06/2023). It is important to note, however, that in contrast to England, Scottish school food provision and governance has not been academised and all catering is provided by local authority caterers often with a single menu across all schools within the local authority, and all state-funded schools are under local authority control. Scotland's national executive agency, *Education Scotland*, employs a dedicated team of Health and Nutrition Inspectors to conduct inspections monitoring adherence to nutritional standards (Kenton-Lake et al., 2021). Although Scottish local authorities hold statutory responsibility for compliance, the Health and Nutrition inspectors provide independent oversight – spending several days in schools making observations, reviewing documentation and conducting interviews. They report to the school and catering service, and inspectors follow up, supporting ongoing improvements (Kantar Public, 2023). The 2022 FSA report notes that this approach is time and resource intensive, happens less frequently than routine hygiene inspections and require inspectors to have nutrition training (Kantar Public, 2023). That said, it does follow observed measures for the improving adherence to school food policy with its focus on encouraging capacity building in school settings (Matela et al., 2023).

There are, nonetheless, limits to how far local authorities can influence school food provision in England, given the growing dominance of Multi-Academy Trusts (MATs) as autonomous decision-makers with their own priorities, alongside the expansion of contract catering companies offering low-cost tenders, appealing to schools and academies. A major consequence has been the erosion of local authority control over school-related budget streams. One local councillor observed, *"As a council we have less interest in school food now because of the academisation agenda. There are new players and we have less money, less opportunity, less oversight, and less ability to make change in this area"* (07/03/23). This trend is likely to persist as rising food and staffing costs, and the challenge of remaining competitive, prompts some local authorities to reconsider the viability of maintaining public catering services, given that it is not a statutory responsibility to provide one (Local authority caterers, 20/02/23; Senior local authority catering manager, 13/1/25).

3.2.2 Innovation within schools and academy trusts

It is ultimately the statutory responsibility of school governors and trustees of Academy Trusts to ensure compliance with the SFS [Department for Education (DfE), 2025a]. However, anecdotal and empirical evidence suggests that many governors are unaware of this responsibility (27/01/23; CEO of a MAT and head teacher, 10/03/23; Pallan et al., 2024b). This may explain why compliance across schools is variable and often shaped by individual school leadership (Parnham et al., 2022a).

One effective strategy at the school level is the adoption of a 'whole school approach to food,' an approach first given prominence in the 2013 School Food Plan, which seeks to embed a healthy food culture throughout the school day. This approach aligns with the World Health Organization's Health Promoting Schools framework, which emphasises a whole-school strategy, integrating health into school policies, the curriculum, the school environment, and engagement with families and the community (Turunen et al., 2017). This includes using mealtimes as teaching opportunities and building connections with local farmers. This approach is endorsed by the DfE's SFS guidance and the updated Ofsted inspection framework, which also encourages schools to develop voluntary food policies and action plans. Schools and Academies can also independently sign up to the FFL award standards, with FFL recognising where schools may not have direct influence over their catering provider (Food for Life, n.d.) There are also other organisations and academic collaborations that have stepped into the implementation vacuum to offer free guidance to schools for sustainable and healthy food provision (Food charity director, 08/06/23; Food charity coordinator, 20/06/2023). In practise, headteachers often take the lead in driving this agenda, implementing school-specific policies to promote school meal uptake and foster a positive food culture. Examples include extending lunch breaks, restricting packed lunches, and compulsory uptake of FSM (FFL programme manager, 27/01/23; CEO of MAT and headteacher, 10/03/23; School business manager, 12/03/23).

The 2023 Procurement Act includes Academy Trusts under its remit, enabling them to consider quality, sustainability, nutrition, and social value alongside cost when awarding catering contracts. Whether they do in practise, however, is highly variable. Some MATs align catering with their educational and ethical aims, such as promoting sustainability and healthy lifestyles. Others delegate decisions to operations managers, who often prioritise the lowest financial bid (CEO of a MAT and headteacher, 10/03/23). A senior local authority catering manager (13/03/23; 13/01/25) noted that some recent MAT tenders had removed FFL quality standards and explicitly favoured cheaper options. The catering service had previously won contracts based on better quality sourcing but were unable to compete on price alone. One senior local authority manager was particularly disheartened by cases where schools absorbed into MATs were switched from public sector provision to the existing MAT catering service provider, without consultation with headteachers, parents, or pupils (13/01/25).

Interviewees raised concerns that regulation is lagging behind academisation, with little consideration for how policy plays out across diverse catering structures. For example, the Labour Party's 2024 election pledge to source 50 per cent of public sector food locally and sustainably would also need to apply to Academy Trusts and private contractors, or risk pushing public providers out of the market entirely, given the higher costs of local sustainable sourcing (Senior local authority catering manager, 13/01/25).

3.2.3 Innovation within private sector catering

Private caterers are not required to provide any public service, beyond meeting the mandatory SFS. There is nevertheless evidence of best practise in local and more sustainable procurement within the private sector, especially from inhouse caterers where they may have greater autonomy in procurement decisions and the ability to create direct long-term relationships with local suppliers (Private school caterer, 30/03/23; Dimbleby and Vincent, 2013). Some private providers have also independently pursued FFL caterer certification and adopted sustainable procurement models. Interviewees highlighted some examples including *Food for Thought*—a not-for-profit, member-owned school meals provider serving 90 schools in Liverpool – that sources over 50 per cent of its food locally, 30 per cent

organically, and uses free-range eggs and farm-assured meat. Similarly, *Local Food Links*, a community-owned social enterprise based in Dorset, supplies 50 member schools and sources nearly all its ingredients from Dorset-based producers (FFL programme manager 27/01/23; 26/10/23; FFL coordinator, 20/06/23; Local Food Links, 2025; Food for Thought, 2025).

3.3 The economics of English school meal provision and limits to innovation in implementation settings

The previous sections explored English policy on healthy, sustainable school meals, highlighting variation and innovation in implementation settings. This section shifts focus to the wider policy landscape, where structural factors, such as funding arrangements, eligibility criteria for FSM, and the continuing effects of austerity on local authorities, shape what is possible in practise. Interviewees highlighted how these factors influenced their capacity to implement policy and improve the overall quality and sustainability of school meals.

Funding arrangements for school meals in England present systemic challenges to implementation efforts. The 2013 School Food Plan recommended universal FSM for all UK primary school children citing wider health, attainment and social benefits – a policy since adopted by Scotland and Wales although not Northern Ireland (Welsh Government, 2024; Scottish Government, 2024; NI Education Authority, 2025). In England, however, the vast majority of schools only provide FSM for the first 3 years of primary education, with means-tested eligibility beyond this based on household income and receipt of benefits. In 2024, 24.6 per cent of children in England were eligible for funded meals, over 2 million pupils (Department for Environment, Food and Rural Affairs (DEFRA), 2024).

Campaigners argue that expanding eligibility in England would address food insecurity, improve uptake and secure the economies of scale necessary to sustain school meal services, which require over 50 per cent uptake, or roughly 150 paid meals daily to remain viable (Dimbleby and Vincent, 2013; Bremner and Co, 2024). In June 2025, the Labour Government announced a rise in the eligibility threshold to include children from all households receiving Universal Credit – a move that would provide free school meals to 500,000 more English children [Department for Education (DfE), 2025e]. This has been welcomed by campaigners, although is still far from universal provision (School Food Matters, 2025).

In addition, funding levels for FSM in England do not match inflation and the rising costs of delivering high-quality meals. For the 2025–2026 year, the government allocated £2.61 per pupil per meal, to cover ingredients, staffing and overhead costs [Department for Education (DfE), 2025d]. The actual cost of a school lunch meeting basic nutritional and sustainability standards, such as the FFL Bronze award, is estimated to be £3.16 (Bremner and Co, 2024). As a result, caterers set contracts with schools to provide meals at a higher rate to cover their costs, with parents, schools or local authorities having to fill this funding gap (Senior local authority catering manager, 13/01/25).

This shortfall contrasts with the higher 2025–2026 per-meal allocations provided in Wales (£3.20) and Scotland (£3.33) although is similar to the primary school allocation in Northern Ireland (£2.60). Anita Brown, chair of the Caterers' Association (LACA) argues that this funding shortfall in England directly impacts compliance: *"Schools are struggling to comply with the School Food Standards because funding does not always cover costs"* (House of Lords, 2024). Finally, the absence of ring-fenced government funding for school meals further undermines provision given that headteachers can reallocate these funds to other priorities. One study estimated that £88.3 million of funds allocated for FSMs in England during the 2016–17 academic year were claimed but not actually spent on meals (Defeyter and Stretesky, 2019). Interviewees in Leicester reported that some schools divert as much as £40,000 annually—equivalent to 30–35 per cent of their FSM budget (Local authority caterer, 20/02/23; public health consultant, 02/03/23).

The cumulative budget constraints must be viewed in the context of broader ideological shifts shaping the role and capacity of English local authorities. From the 1980s onwards, the introduction of neo-liberal and market-oriented policies reshaped school food provision, leading to what a former head of a local authority catering service described as a situation where *"quality actually went out of the window, and it was about who could offer the cheapest service going."* (04/10/23; Morgan, 2025). Against this background in 2010, the Conservative government launched an austerity programme, rooted in an ideological commitment to reduce public spending, which led to prolonged cuts to local authority budgets. Between 2009/10 and 2021/22, these measures reduced local authority spending power by 21 per cent in real terms (Kidd and Reynolds, 2024). Although austerity policies were suspended during the COVID-19 pandemic, local government officials report their return from late 2022 (City councillor, 07/03/23; County councillor, 10/03/23). This renewed pressure on budgets is reflected in mounting deficit. By 2024, both Leicestershire County Council and Leicester City Council were facing major budget shortfalls and warnings of insolvency, with interviewees citing austerity budgeting as a significant factor, alongside rising adult social care costs (Leicestershire County Council, 2024a; Leicestershire County Council, 2024b; Leicester City Council, 2024; Senior local authority catering manager, 13/01/25).

Shrinking budgets, cost saving 'restructuring' and outsourcing of key services, have fragmented policy and service delivery and left council departments under-resourced (Public health consultants, 12/02/23; 02/03/23). This has directly constrained the ability of some local authorities to support school food policy implementation, through measures such as subsidising public sector catering or commissioning programmes like FFL, especially since doing so is not a statutory duty and therefore not a funding priority. Leicester City Council, for example, ended its FFL commission after 8 years in 2023 and in 2025, closed its public sector caterer, Leicester City Catering which was not financially viable without local authority support (Member of the public health team 17/02/23; Senior local authority catering manager, 13/01/25). Limited budgets have also pushed local authority procurement towards lowest-cost contracts with a city councillor explaining that budget constraints meant the City Council could no longer meet its own sustainable food procurement policy (07/03/23). A county councillor similarly explained that the COVID-19 pandemic and budget cuts had halted plans to increase local food sourcing; the current funding environment making them less willing to take risks or innovate (10/03/23). LTS noted that financial and supply pressures left them unable to maintain their Gold FFLSH award, and by 2025, they dropped to Bronze award level (Senior local authority catering manager, 13/01/25). Without financial cushioning, public sector school food provision is also less resilient to

unexpected shocks such as the COVID-19 pandemic, rising inflation and oil prices, and climate change disrupting supply chains (Local authority caterers, 09/02/23; 20/02/23).

A public health consultant (12/02/23) highlighted the difficult trade-offs facing many public health teams in the era of austerity:

> *"You have to understand the dialogue in local government now. If we argue we need to put more money into food for children, then that means having to cut statutory services for child safeguarding. Yes, good nutrition is important and has lifelong health and economic benefits, but what about the children in immediate risk? Because of the budget cuts, we are firefighting …local government is really challenging at the moment."*

Despite the constraints described above, some local authorities are still demonstrating leadership and innovation in school food provision, especially where there is political will and additional funding sources. From 2023 onwards, the Mayor of London, Sadiq Khan, has made FSM a flagship anti-poverty initiative, allocating discretionary funds, sourced from higher-than-anticipated business rate revenues, to extend universal free meals to all primary school pupils across London boroughs until 2029. These meals are also funded at a higher rate of £3 per child (Mayor of London, 2024).

4 Discussion

> *"Your beans ask interesting questions and pose interesting dilemmas at every stage of the process."* A City Councillor (07/03/23).

The *BeanMeals* project research offered a lens through which to view the complex and uneven terrain of English school food governance. Although national policy exists, this does not prescribe mechanisms for implementation, allowing space for local interpretation, innovation, and resistance. English school food policy is thus implemented in varied ways, shaped by a wide range of actors, priorities, and local conditions. As our findings show, implementation settings are not passive delivery sites, but dynamic, relational spaces (Lever et al., 2019). This section discusses this finding and examines several elements that characterise "implementation settings" including local innovation and entrepreneurship; the shifting role of the state; and the wider ideological forces shaping English school food governance.

Local authorities emerged in this research as playing an important role in the implementation of school food policy a point re-iterated by the wider literature, e.g., Morgan (2025). In the absence of prescribed methods, implementation becomes a process of "policy translation," with local authorities adapting national policy in ways that align with local political, economic, and institutional conditions (Hudson et al., 2019; Capano and Lepori, 2024). Across our case studies, we found examples of public health, sustainability, and procurement teams and committed public sector workers working collaboratively with both public- and private-sector caterers to reformulate menus, procure from local and sustainable supply chains and embed sustainability goals. This often relied on working creatively and synergistically within existing budgets and statutory responsibilities to identify leverage points where action could be taken. These findings highlight implementation settings as relational and dynamic spaces of practise with implementation necessarily co-created by local actors in the context of restrained central state involvement, producing a range of outcomes contingent on local capacities and relationships.

This research also underscores the importance of policy entrepreneurship in school food governance, as NGOs, charities, private companies and individual "food policy champions" play a central role in translating school food policy into practise. The research observed how these entrepreneurs drew on specialised knowledge, networks and narrative framing to develop innovative tools and exploit implementation settings to embed their ideas within the public agenda. It also illustrates how policy entrepreneurs have collaborated with local authorities to catalyse improvements in school food provision and how these local experiments can inform and even set national agendas. For example, the FFL voluntary standards, supported by local authority commissions, are routinely cited in government guidance and referenced as a model for future policy [Dimbleby, 2021; Department for Education (DfE), 2025a]. Similarly, the private tech company Equilibrium Markets developed software during a five-year, EU-funded pilot with Bath and Northeast Somerset (BANES) Council to facilitate local procurement in schools (Wilkinson et al., 2024), a modified version of which was later adopted by the Crown Commercial Service for its *Buying Better Food* online platform.

The research illustrates how some school catering services have become central policy actors, rather than merely neutral service providers. Their engagement with reformulation of menus, and coordination with local suppliers positioned them as co-producers of policy, with a clear understanding of operational constraints and opportunities. In this sense, policy entrepreneurship is not confined to external innovators but extends to actors within the delivery infrastructure who act with discretion and strategic intent (Lipsky, 1980; Arnold, 2021). Similarly, the research highlighted how headteachers and other school staff are policy actors in implementation settings, adapting and translating policy based on situated expertise (Lever et al., 2019). The roles taken by these varied actors align with broader shifts in governance, where the state's role in direct delivery diminishes and implementation increasingly depends on cross-sector partnerships. This is emphasised by Sabet and Böhm's (2024) concept of the "school food partnership," which highlights the importance of collaboration between schools, caterers, and local producers to promote sustainable practises in school meals and food education in England. The research further finds that these non-state actors have maintained discursive momentum around the transformative potential of school food in public and policy spaces, particularly where the state has been unresponsive or prone to inertia (Lang et al., 2009; Morgan, 2025).

Although this shift to distributed governance has opened new spaces for innovation and best practise, it also illuminates the limits to what can be enacted locally in the face of systemic underinvestment. A consistent finding across this study was that innovation in school food hinges not just on local creativity but on access to adequate, stable funding; and on whether local actors retain control over that funding. The ongoing failure to resolve school meal funding disparities, alongside broader austerity-era disinvestment in public services, has constrained the capacity of local authorities and schools to maintain or scale promising initiatives (Sager and Gofen, 2022). The picture in many English schools continues to be one where compliance to the SFS is variable and there is overreliance on lowest-cost

industrialised pre-packaged food, sourced from multinational wholesalers through global supply chains (Sabet, 2022).

In recent years there are signs of renewed state interest in school food. Recent public concern about nutritional standards and health inequalities (House of Lords, 2024; Quince, 2024) has prompted the Department for Education to invest in online training for school governors and collaboration with the Food Standards Agency (FSA) on a pilot inspection programme. Yet these engagements remain shaped by the logics of regulatory governance (Majone, 1994; Power, 1997) as exemplified by the joint pilot with the FSA and local authorities focusing narrowly on auditing compliance to standards rather than broader pedagogical or public health goals; or implementation strategies such as capacity-building which Matela et al. (2023) identify as critical to effective school food policy implementation. In 2025, the Labour Government has clearly recognised the potential of school food policy as an anti-poverty and public health measure, through introducing pilots for free breakfast clubs, extending free school meal eligibility, and launching a review of the SFS. However, these findings emphasise that for such a review to drive systemic change and avoid a "postcode lottery" in the quality of provision, it must also address how policies are implemented in practise.

The outcomes of implementation settings are highly variable; whilst they can serve as sites of innovation, they also risk entrenching inequality and enabling poor practise – because of systemic design rather than local shortcomings (Sætren, 2024). It is notable that many interviewees expressed a desire for stronger state intervention including formal implementation mechanisms. This is not to suppress local autonomy but rather to raise standards equitably and ensure allocation of adequate resources. In this context, both the FFL approach and Scotland's nationally funded school food officers were cited as examples of how to effectively embed implementation in schools. Advocacy organisations such as School Food Matters are lobbying for a comparable English scheme, proposing government-funded School Food Improvement Officers in each local authority—potentially financed via a 2p-per-meal 'quality tariff' on FSM (School Food Matters, 2024). Some London boroughs, such as Southwark and Tower Hamlets, are already pioneering this model using discretionary and charitable funds. Rather than welcoming the retreat of the state, these interviewees and wider stakeholders call for clearer mandates, long-term investment, and joined-up strategy. This contrasts with some positive narratives of decentralisation and aligns with recent scholarship highlighting that centralised leadership, with clear and responsive legislative and complementary budgetary mandates, remains crucial for equity and coherence in food governance (Yapp, 2023).

The findings reflect the enduring influence of neoliberal ideology on English school food policy since the 1980s – a paradigm prioritising market mechanisms, devolved service delivery, and reductions in public expenditure as realised through austerity-driven funding cuts in the early to mid 2010s and again from 2022. These broader policies have profoundly shaped English school food: the marketisation of catering has fostered a complex mix of public and private providers and, combined with academisation, has removed many levers of local authority oversight. This complicates efforts to implement consistent standards and effective monitoring across a now fragmented landscape of public and private actors. For many interviewees, whilst they acknowledged examples of best practise, these dynamics underscored the need for a more fundamental review of the governance and values underpinning school food in England.

The main limitations of this case study are its timing during a period of economic and political volatility (2022–2024) including the aftermath of Brexit, the COVID-19 pandemic, and ongoing public sector austerity. Interviewees suggested that introducing UK-grown beans into school meals would have faced fewer barriers pre-2020, when budgets and institutional capacity were less constrained. These conditions may have influenced both the feasibility of the intervention and the broader implementation landscape. Additionally, the primary interview data came from two city and county implementation settings within England, which may limit generalisability to other contexts. Future research could explore individual implementation settings more explicitly as sites of multi-level contestation, adaptation, and negotiation.

5 Conclusion

The findings of this research highlight the complexities of using public procurement as a lever for transformational change, based on a case study of introducing UK-grown beans into primary school meals in England. Although the initial proposal may appear technically straightforward by replacing imported, less sustainable ingredients with sustainably produced UK beans, our findings reveal that such interventions would be shaped by the complexity of English school food governance and its public procurement. The implementation of school food policy in England is not shaped by uniform governance mechanisms but is rather a patchwork of diverse actors, priorities, and constraints that influence how national goals are interpreted, adapted, and enacted on the ground.

To better understand these dynamics, this paper has introduced the concept of *implementation settings*, relational spaces in which governance is performed, contested, and co-produced. These settings are shaped by interactions between public institutions, private actors, NGOs, and individual policy entrepreneurs, all operating within wider structural and ideological conditions with variable outcomes. The research, conducted during a period of economic and political volatility, highlights how local collaboration between local authorities, caterers, school and catering staff, and the voluntary sector can foster innovation in school food provision, whilst also underscoring the limitations of such efforts in the absence of adequate resources, strong national leadership, and systemic reform.

Data availability statement

The raw data supporting the conclusions of this article will be made available by the authors, without undue reservation, in anonymised form to protect participant confidentiality in accordance with ethical approval.

Ethics statement

The studies involving humans were approved by University of Hertfordshire Ethics Committee. The research was covered by two ethics protocols from December 2022 to the end of July 2025: LMS/SF/UH/05202 and 0228 2024 Nov HSET. The studies were conducted in accordance with the local legislation and institutional requirements.

The participants provided their written informed consent to participate in this study. Written informed consent was obtained from the individual(s) for the publication of any potentially identifiable images or data included in this article.

Author contributions

LM: Conceptualization, Methodology, Investigation, Data curation, Formal analysis, Writing – original draft, Writing – review & editing. DB: Funding acquisition, Conceptualization, Methodology, Investigation, Formal analysis, Writing – original draft, Writing – review & editing.

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Conflict of interest

The authors declare that the research was conducted in the absence of any commercial or financial relationships that could be construed as a potential conflict of interest.

Generative AI statement

The authors declare that no Gen AI was used in the creation of this manuscript.

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References

Adamson, A., Spence, S., Reed, L., Conway, R., Palmer, A., Stewart, E., et al. (2013). School food standards in the UK: implementation and evaluation. *Public Health Nutr.* 16, 968–981. doi: 10.1017/S1368980013000621

AgileChain (2025) Homepage. Available online at: https://www.agilechain.io (Accessed 29 May, 2025).

Arnold, G. (2021). Distinguishing the street-level policy entrepreneur. *Public Admin.* 99, 439–453. doi: 10.1111/padm.12703

Bell, S., and Hindmoor, A. (2009). *Rethinking governance: The centrality of the state in modern society*. Cambridge: Cambridge University Press.

Béné, C., and Abdulai, A. R. (2024). Navigating the politics and processes of food systems transformation: guidance from a holistic framework. *Front. Sustain. Food Syst.* 8:9024. doi: 10.3389/fsufs.2024.1399024

BESA. (2019). Multi-Academy Trusts: The procurement landscape. Final Report published. British Educational Suppliers Association. Available online at: https://www.besa.org.uk/wp-content/uploads/2019/03/Multi-academy-trust-procurement-research-2019.pdf (Accessed 30 September, 2025).

Boswell, J., and Corbett, J. (2015). Stoic democrats? Anti-politics, élite cynicism and the policy process. *J. Eur. Public Policy* 22, 1388–1405. doi: 10.1080/13501763.2015.1010561

Braun, V., and Clarke, V. (2006). Using thematic analysis in psychology. *Qual. Res. Psychol.* 3, 77–101. doi: 10.1191/1478088706qp063oa

Bremner and Co. (2024). Cost of school meal: calculating the cost of a health and sustainable school lunch. School food matters supported by impact on Urban Health. Available online at: https://www.schoolfoodmatters.org/sites/default/files/2024-10/CoaSM-report.pdf (Accessed 29 May, 2025).

Bremner, M, and Osborne, R. (2025) Follow the Carrot: Can free school meal expansion boost the UK food and farming economy? Available online at: https://www.sustainweb.org/assets/follow-the-carrot-1757078726.pdf (Accessed 29 September, 2025).

Brinkmann, S. (2023). "Introduction to qualitative interviewing", in qualitative interviewing: Conversational knowledge through research interviews. *2nd* Edn. New York: Oxford Academic.

Cabinet Office. (2014). Government Buying Standards for Food and Catering Services. Available online at: https://www.gov.uk/government/publications/sustainable-procurement-the-gbs-for-food-and-catering-services/government-buying-standard-for-food-and-catering-services (Accessed 29 May, 2025).

Cabinet Office. (2023). Assessing competitive tenders: Procurement Act 2023 guidance. Available online at: https://www.gov.uk/government/publications/procurement-act-2023-guidance-documents-procure-phase/assessing-competitive-tenders-html (Accessed 29 May, 2025).

Cabinet Office. (2024). National Procurement Policy Statement stakeholder survey. Available online at: https://www.gov.uk/guidance/national-procurement-policy-statement-stakeholder-survey (Accessed 29 May, 2025).

Crown Commercial Service (CCS) (2023). *School children and hospital patients set for higher quality food under new government plans*. GOV: UK. Available online at: https://www.gov.uk/government/news/school-children-and-hospital-patients-set-for-higher-quality-food-under-new-government-plans

Crown Commercial Service (CCS) (2024). *New first-of-its-kind CCS agreement for public sector food procurement goes live*. Available online at: https://www.crowncommercial.gov.uk/news/new-first-of-its-kind-ccs-agreement-for-public-sector-food-procurement-goes-live

Capano, G., and Lepori, B. (2024). Designing policies that could work: understanding the interaction between policy design spaces and organizational responses in public sector. *Policy. Sci.* 57, 53–82. doi: 10.1007/s11077-024-09521-0

Defeyter, G., and Stretesky, P. B. (2019). *Hungry for Change: A working paper on free school meals*: Feeding Britain. Available online at: https://feedingbritain.org/wp-content/uploads/2019/06/Hungry-for-Change_Final_Version_GD-002.pdf

Department for Education (DfE). (2025a). School food standards: a practical guide. Updated 13 February 2025. DfE. Available online at: https://www.gov.uk/government/publications/school-food-standards-resources-for-schools/school-food-standards-practical-guide (Accessed 29 May, 2025).

Department for Education (DfE). (2025b). First schools confirmed for landmark free breakfast clubs. 23 February 2025. DfE. Available online at: https://www.gov.uk/

government/news/first-schools-confirmed-for-landmark-free-breakfast-clubs (Accessed 29 May, 2025).

Department for Education (DfE). (2025c). Creating a culture and ethos of healthy eating. Available online at: https://www.gov.uk/government/publications/school-food-standards-resources-for-schools/creating-a-culture-and-ethos-of-healthy-eating (Accessed 29 May, 2025).

Department for Education (DfE). (2025d). DfE update local authorities: 23 April 2025. Available online at: https://www.gov.uk/government/publications/dfe-update-23-april-2025/dfe-update-local-authorities-23-april-2025 (Accessed 16 May, 2025)

Department for Education (DfE). (2025e). Over half a million more children to get free school meals. 4 June 2025 GOV.UK. Available online at: https://www.gov.uk/government/news/over-half-a-million-more-children-to-get-free-school-meals (Accessed 24 September, 2025)

Department for Environment, Food, and Rural Affairs (DEFRA). (2022). Public sector food and catering policy for England: the government buying standards for food and catering. Proposed document for June 2022 consultation. DEFRA. Available online at: https://consult.defra.gov.uk/public-sector-food-procurement/food-and-catering-consultation/supporting_documents/Proposed%20public%20sector%20food%20and%20catering%20policy%20for%20England%201.pdf (Accessed 29 May, 2025).

Department for Environment, Food and Rural Affairs (DEFRA) (2024). *United Kingdom Food Security Report 2024: Theme 4 – Food security at household level [Statistical publication]*. GOV: UK. Available online at: https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2024/united-kingdom-food-security-report-2024-theme-4-food-security-at-household-level (Accessed October 31, 2025).

Department for Environment, Food, and Rural Affairs (DEFRA). (2025). Steve Reed speech at the 2025 Oxford Farming Conference. 9 January 2025. Available online at: https://www.gov.uk/government/speeches/steve-reed-speech-at-the-2025-oxford-farming-conference (Accessed 29 May, 2025).

Department for Levelling Up, Housing and Communities (DLUHC) (2022). Levelling Up the United Kingdom: Policy Paper. https://www.gov.uk/government/publications/levelling-up-the-united-kingdom (Accessed 29 May, 2025).

Dimbleby, H. (2021). National Food Strategy: the plan (part two). Independent Review for the UK Government. Available online at: https://www.gov.uk/government/publications/national-food-strategy-for-england (Accessed 29 May, 2025).

Dimbleby, H., and Vincent, J. (2013). The School Food Plan. https://assets.publishing.service.gov.uk/media/5fb407d28fa8f54aada6df60/The_School_Food_Plan.pdf (Accessed 29 May, 2025).

Djojosoeparto, S. K., Verain, M. C. D., Schebesta, H., Biesbroek, S., Poelman, M. P., and Candel, J. J. L. (2025). Harnessing the potential of public procurement for the protein transition – perceived barriers and facilitators. *Agr. Hum. Values.* 42, 351–368. doi: 10.1007/s10460-024-10610-2

Durose, C. (2011). Revisiting Lipsky: Front-line work in UK local governance. *Political Studies* 59, 978–995. doi: 10.1111/j.1467-9248.2011.00886.x

Education Act (1980). Available online at: https://www.legislation.gov.uk/ukpga/1980/20/enacted?utm_source=chatgpt.com (Accessed October 31, 2025).

Education Policy Institute. (2017). The economic benefits of joining, establishing or growing a multi-academy trust. Available online at: https://epi.org.uk/wp-content/uploads/2024/04/The-economic-benefits-of-joining-establishing-or-growing-a-multi-academy-trust.pdf (Accessed 30 September, 2025)

Environment, Food and Rural Affairs Committee (EFRA) (2021) Public sector procurement of food: sixth report of session 2019–21. House of Commons. Available online at: https://committees.parliament.uk/work/370/public-sector-procurement-of-food/publications/ (Accessed 29 May, 2025).

European Commission (2021) Dynamic purchasing systems. Publications Office of the European Union. Available online at: https://op.europa.eu/en/publication-detail/-/publication/9b5394f7-3219-11ec-bd8e-01aa75ed71a1/language-en (Accessed 29 May, 2025).

Finch, A. (2019). The provision of school meals since 1906: progress or a recipe for disaster? History and Policy. Available online at: https://www.historyandpolicy.org/policy-papers/papers/the-provision-of-school-meals-since-1906-progress-or-a-recipe-for-disaster (Accessed 29 May, 2025).

Food and Agriculture Organization (FAO), Alliance of Bioversity International and CIAT, Editora da UFRGS (2021). Public food procurement for sustainable food systems and healthy diets - volume 2. Rome: Food and Agriculture Organization (FAO).

Food for Life (2019). State of the Nation: Children's Food in England 2019. Available online at: https://www.foodforlife.org.uk/~/media/files/sotn/sotn_2019.pdf (Accessed 29 May, 2025).

Food for Life (2025). Transform your school's food culture with a Food for Life Award. Available online at: https://www.foodforlife.org.uk/work-with-us/schools-and-early-years/schools/ (Accessed 29 May, 2025).

Food for Life (n.d.). Food for Life Bronze Award. Available online at: https://portal.foodforlife.org.uk/~/media/files/criteria%20and%20guidance/893-00-ffl-criteria_layout-final-(2).pdf (Accessed 29 May, 2025).

Food for Thought (2025). Our Story. Available online at: https://foodforthoughtschools.co.uk/about/our-story/ (Accessed 29 May, 2025).

Food Standards Agency (FSA) (2024). Food Standards Agency publishes final report on School Food Standards compliance pilot. Available online at: https://www.food.gov.uk/news-alerts/news/food-standards-agency-publishes-final-report-on-school-food-standards-compliance-pilot (Accessed 29 May, 2025).

Furey, S., and Woodside, J. (2022). School meals case study: Northern Ireland. Research consortium for school health and nutrition. UNESCO. Available online at: https://healtheducationresources.unesco.org/index.php/fr/library/documents/school-meals-case-study-northern-ireland (Accessed 29 September, 2025).

Gallagher-Squires, C., Isaacs, A., Reynolds, C., and Coleman, P. C. (2023). Snacking practices from infancy to adolescence: parental perspectives from longitudinal lived experience research in England. *Proc. Nutr. Soc.* 15, 1–9. doi: 10.1017/S0029665123003592

Goudie, S., and Hughes, I. (2022). The broken plate. London: Food Foundation.

Haroun, D., Harper, C., Wood, L., and Nelson, M. (2011). The impact of the food-based and nutrient-based standards on lunchtime food and drink provision and consumption in primary schools in England. *Public Health Nutr.* 14, 209–218. doi: 10.1017/S1368980010002132

Harrison, F., Jennings, A., Jones, A. R., Welch, A., van Sluijs, E. M. F., Griffin, S. J., et al. (2013). Food and drink consumption at school lunchtime: the impact of lunch type and contribution to overall intake in British 9-10-year-old children. *Public Health Nutr.* 16, 1132–1139. doi: 10.1017/S1368980011002321

House of Lords (2024). Recipe for health: a plan to fix our broken food system. House of Lords Food, Diet and Obesity Committee. Available online at: https://committees.parliament.uk/committee/698/food-diet-and-obesity-committee/news/203372/the-government-needs-a-plan-to-fix-our-broken-food-system-and-turn-the-tide-on-the-public-health-emergency/ (Accessed 29 May, 2025).

Hudson, B., Hunter, D., and Peckham, S. (2019). Policy failure and the policy-implementation gap: can policy support programs help? *Policy Des. Pract.* 2, 1–14. doi: 10.1080/25741292.2018.1540378

Ingram, J., Barling, D., Bayes, N., Cottee, J., Dickinson, A., Hardman, C., et al. (2025). Fork to farm: reverse engineering a food system. *Philos. Trans. R. Soc. B Biol. Sci.* 380:158. doi: 10.1098/rstb.2024.0158

Kantar Public. (2023). School food standards compliance pilot: Discovery research. November 2023. Available online at: https://www.food.gov.uk/research/innovative-regulator/school-food-standards-compliance-pilot-discovery-and-feasibility-research (Accessed 29 May, 2025).

Keech, D., Maye, D., and Reed, M. (2025). Dynamic food procurement and cross-sectoral tensions: the practical and contractual complexities of digitising local school food supply. *Food. Foodways* 33:2. doi: 10.1080/07409710.2025.2482488

Kenton-Lake, S., Heger, J., Tobi, R., and Gurun, I. (2021). Feeding our future: an inVegstigation into UK School food. Peas Please: The Food Foundation. Available online at: https://foodfoundation.org.uk/sites/default/files/2021-10/Peas-Please-School-Food-Report-2021-Spreads.pdf (Accessed 29 May, 2025).

Kersley, H, and Knuutila, A. (2011). The benefits of procuring school meals through a food for life partnership: an economic analysis. New Economics Foundation. Available online at: https://new-economicsf.files.svdcdn.com/production/files/8730d0b778c9021bab_cpm6b61os.pdf (Accessed 29 September, 2025).

Kidd, R., and Reynolds, C. (2024). Food policy coherence in local government. Who does what and why? *Food Policy* 129:102740. doi: 10.1016/j.foodpol.2024.102740

Lalli, G., Smith, K., Woodside, J., Defeyter, G., Skafida, V., Morgan, K., et al. (2024). A brief review of secondary school food policy (SSFP) approaches in the UK from 2010 to 2022. *Nutr. Food Sci.* 54, 433–450. doi: 10.1108/NFS-11-2023-0259

Lang, T., Barling, D., and Caraher, M. (2001). Food, social policy and the environment: towards a new model. *Soc. Policy Adm.* 35, 538–558. doi: 10.1111/1467-9515.t01-1-00252

Lang, T., Barling, D., and Caraher, M. (2009). Food policy: integrating health, environment and society. Oxford: Oxford University Press.

Leicester City Council. (2024). Audit and Accounts Committee report: 2023/24. Available online at: https://cabinet.leicester.gov.uk/documents/s160312/Item%205%20-%20Leicester%20CC%20AAR%202023-24_Final.pdf (Accessed 29 May, 2025).

Leicestershire County Council. (2024a). Productivity Plan: July 2024. Available online at: https://www.leicestershire.gov.uk/sites/default/files/2024-07/Productivity-Plan-July-2024.pdf (Accessed 29 May, 2025).

Leicestershire County Council. (2024b). Statement of accounts 2023/24, annual governance statement and pension fund accounts. Available online at: https://www.leicestershire.gov.uk/sites/default/files/2025-02/2023-24-Statement-of-Accounts-Annual-Governance-Statement-and-Pension-Fund-Accounts.pdf (Accessed 29 May, 2025).

Lever, J., Sonnino, R., and Cheetham, F. (2019). Reconfiguring local food governance in an age of austerity: towards a place-based approach? *J. Rural. Stud.* 69, 97–105. doi: 10.1016/j.jrurstud.2019.04.009

Lipsky, M. (1980). *Street-level bureaucracy: Dilemmas of the individual in public services*. New York: Russell Sage Foundation.

Local Food Links. (2025). For schools. Available online at: https://www.localfoodlinks.org.uk/headteachers/ (Accessed 29 May, 2025).

Love British Food. (2022). Supplying Blackpool schools fruit and veg from Ribble farm fare. 11 May 2022. Available online at: https://www.lovebritishfood.co.uk/ribble-farm-fare (Accessed 29 May, 2025).

Majone, G. (1994). The rise of the regulatory state in Europe. *West Eur. Polit.* 14, 77–101. doi: 10.1080/01402389408425031

Matela, H., Yadav, S., and Menon, K. (2023). Robust implementation of school food policy is needed to improve nutritional outcomes of children in European and Western Pacific countries: a systematic review. *J. Nutr.* 122:2373. doi: 10.1016/j.nut.2024.112373

Mayor of London (2024). Free School Meals. Available online at: https://www.london.gov.uk/who-we-are/what-mayor-does/priorities-london/free-school-meals?ac-201306=201305 (Accessed 29 May, 2025).

McIntyre, R. L., Adamson, A. J., Nelson, M., Woodside, J., Beattie, S., and Spence, S. (2022). Changes and differences in school food standards (2010-2021) and free school meal provision during COVID-19 across the UK: potential implications for children's diets. *Nutr. Bull.* 47, 230–245. doi: 10.1111/nbu.12556

Monticone, F., Barling, D., Parsons, K., and Samoggia, A. (2023). Identifying food policy coherence in Italian regional policies: the case of Emilia-Romagna. *Food Policy* 119:102519. doi: 10.1016/j.foodpol.2023.102519

Moran, M. (2003). The British regulatory state. Oxford: Oxford University Press.

Morgan, K. (2004). School meals and sustainable food chain: the role of creative public procurement. Caroline Walker lecture. St Austell: The Caroline Walker Trust.

Morgan, K. (2025). Serving the public: The good food revolution in schools, hospitals and prisons. Manchester: Manchester University Press.

NGA (2024). A whole school approach to food, compliance and legislation. E-learning module. Available online at: https://www.nga.org.uk/training/directory/school-food/ (Accessed 29 May, 2025).

NI Education Authority (2025). Frequently Asked Questions: Free School Meals/Uniform Grants. Available online at: https://www.eani.org.uk/parents/pupil-applications-and-grants/free-school-meals-and-uniform-grants/frequently-asked#section-7395 (Accessed 13 October, 2025).

Nixon, N., Bryant, M., Sheard, L., Padgett, L., and Doherty, B. (2025). A scoping review of the existing evidence linking school food procurement contract type with school food provision. *PLoS One* 20:e0305685. doi: 10.1371/journal.pone.0305685

Pallan, M., Murphy, M., Morrison, B., Pokhilenko, I., Sitch, A., Frew, E., et al. (2024b). School food policy in secondary schools in England and its impact on adolescents' diets and dental health: the FUEL multiple-methods study. *Public. Health. Res.* 12:12. doi: 10.3310/TTPL8570

Pallan, M., Murphy, M., Morrison, B., Sitch, A., Adamson, A., Bartington, S., et al. (2024a). National school food standards in England: a cross-sectional study to explore compliance in secondary schools and impact on pupil nutritional intake. *Int. J. Behav. Nutr. Phys. Act.* 21:123. doi: 10.1186/s12966-024-01672-w

Parnham, J. C., Chang, K., Millett, C., Laverty, A., von Hinke, S., Pearson-Stuttard, J., et al. (2022a). The impact of the universal infant free school meal policy on dietary quality in English and Scottish primary school children: evaluation of a natural experiment. *Nutrients* 14:1602. doi: 10.3390/nu14081602

Parnham, J. C., Chang, K., Rauber, F., Levy, R., Millett, C., Laverty, A., et al. (2022b). The ultra-processed food content of school meals and packed lunches in the United Kingdom. *Nutrients* 14:2961. doi: 10.3390/nu14142961

Parnham, J. C., Millett, C., and Vamos, E. P. (2023). School meals in the UK: ultra-processed, unequal and inadequate. *Public Health Nutr.* 26, 297–301. doi: 10.1017/S1368980022002336

Parsons, K., and Barling, D. (2021). What would a transformational approach to food public procurement look like? UKRI Transforming UK Food Systems. Available online at: http://www.research.herts.ac.uk/admin/files/26744460/Parsons_and_Barling_2021_What_would_a_transformational_approach_to_food_public_procurement_look_like_CIRC.pdf (Accessed 29 May, 2025).

Parsons, K., Lang, T., and Barling, D. (2021). London's food policy: leveraging the policy sub-system, programme and plan. *Food Policy* 103:102037. doi: 10.1016/j.foodpol.2021.102037

Pearce, J., Wood, L., and Nelson, M. (2013). Lunchtime food and nutrient intakes of secondary-school pupils; a comparison of school lunches and packed lunches following the introduction of mandatory food-based standards for school lunch. *Public Health Nutr.* 16, 1126–1131. doi: 10.1017/S1368980012003928

Peirson-Hagger, E. (2024). Food standards: why are schools not complying? Times Educational Supplement, 8 November. Available online at: https://www.tes.com/magazine/analysis/general/healthy-school-dinners-are-schools-complying-school-food-standards (Accessed 29 May, 2025).

Pennington, A., Su, F., and Wood, M. (2024). Academisation, neoliberal technologies of governance and the rapid growth of multi-academy trusts (MATs) in England. *Camb. J. Educ.* 54, 517–533. doi: 10.1080/0305764X.2024.2392537

Plymouth City Council. (2025). CATERed. Available online at: https://www.plymouth.gov.uk/catered (Accessed 29 May, 2025).

Power, M. (1997). The audit society. Oxford: Oxford University Press.

Pressman, J. L., and Wildavsky, A. B. (1973). *Implementation: How great expectations in Washington are dashed in Oakland*: University of California Press.

Public Sector Network. (2024). Schools Report 2024. Available online at: https://www.publicsector.co.uk/SchoolsReport2024.pdf (Accessed 29 May, 2025).

Quince, W. (2024). Independent review into public sector food procurement; May 2024. Available online at: https://www.sustainweb.org/assets/independent-review-into-public-sector-food-procurement-may24-1717154707.pdf (Accessed 29 May, 2025).

Ronto, R., Rathi, N., Worsley, A., Sanders, T., Lonsdale, C., and Wolfenden, L. (2020). Enablers and barriers to implementation of and compliance with school-based healthy food and beverage policies: a systematic literature review and meta-synthesis. *Public Health Nutr.* 23:15. doi: 10.1017/S1368980019004865

Sabet, F. (2022). "Sustainable school food procurement in England: when there is a will, there is a way" in Transforming food systems: ethics, innovation and responsibility. eds. D. Bruce and A. Bruce (Wageningen: Wageningen University), 76–81.

Sabet, F., and Böhm, S. (2024). Towards sustainable school food: an experiential planetary health framework integrating meals and food education. *Br. Educ. Res. J.* 56, 826–847. doi: 10.1002/berj.4100

Sætren, H. (2024). "An intellectual history and state-of-the-art assessment of policy implementation research and theory" in Handbook of public policy implementation. eds. F. Segar, C. Mavrot and L. R. Keiser (Cheltenham: Edward Elgar Publishing), 11–21.

Sager, F., and Gofen, A. (2022). The polity of implementation: organizational and institutional arrangements in policy implementation. *Governance* 35, 347–364. doi: 10.1111/gove.12677

School Food Matters. (2024). Our Manifesto 2024. Available online at: https://www.schoolfoodmatters.org/what-we-do/campaigns/our-manifesto-2024 (Accessed 29 May, 2025).

School Food Matters. (2025). Government extends free school meals to all children from families on Universal Credit. Available online at: https://www.schoolfoodmatters.org/news-views/news/government-extends-free-school-meals-all-children-families-universal-credit (Accessed 5 June, 2025).

School Food Review. (2023) School food review manifesto. School Food Matters. Available online at: https://www.schoolfoodmatters.org/sites/default/files/2023-09/SFR-manifesto-Signed.pdf (Accessed 24 September, 2025)

School Meal Coalition. (2023). Homepage. Available online at: https://schoolmealscoalition.org (Accessed 29 May, 2025).

Scientific Advisory Committee on Nutrition (SACN). (2015). Carbohydrates and Health. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/445503/SACN_Carbohydrates_and_Health.pdf (Accessed 29 May, 2025).

Scottish Government (2024). Primary school meals. Available online at: https://www.mygov.scot/primary-school-meals (Accessed 29 May, 2025).

Southwark Council. (2024a). Southwark school meals. Transformation Programme. Available online at: https://education.southwark.gov.uk/southwark-school-meals-transformation/southwark-school-meals-transformation-programme (Accessed 29 May, 2025).

Southwark Council. (2024b). Southwark's school children set for higher quality food under new £4m framework. Available online at: https://services.southwark.gov.uk/news/2024/jun/southwark-s-school-children-set-for-higher-quality-food-under-new-4m-framework (Accessed 29 May, 2025).

Stevens, L., and Nelson, M. (2011). The contribution of school meals and packed lunch to food consumption and nutrient intakes in UK primary school children from a low income population. *J. Hum. Nutr. Dietetics* 24, 223–232. doi: 10.1111/j.1365-277X.2010.01148.x

Sustain. (2024). Southwark Council launches new school food procurement framework. Available online at: https://www.sustainweb.org/news/jun24-southwark-council-school-food-framework (Accessed 29 May, 2025).

Sustainable Food Places. (2024). Homepage. Available online at: https://www.sustainablefoodplaces.org (Accessed 29 May, 2025).

Swensson, L., and Tartanac, F. (2020). Public food procurement for sustainable diets and food systems: the role of the regulatory framework. *Glob. Food Sec.* 25:100366. doi: 10.1016/j.gfs.2020.100366

Tummers, L. G., Bekkers, V. J. J. M., Vink, E., and Musheno, M. (2015). Coping during public service delivery: a conceptualization and systematic review of the literature. *J. Public Adm. Res. Theory* 25, 1099–1126. doi: 10.1093/jopart/muu056

Turunen, H., Sormunen, M., and Jourdan, D. (2017). Health promoting schools-a complex approach and a major means to health improvement. *Health Promot. Int.* 2, 177–184. doi: 10.1093/heapro/dax001

van Bers, C., Delaney, A., Hallie Eakin, H., Cramer, L., Purdon, M., Oberlack, C., et al. (2019). Advancing the research agenda on food systems governance and transformation. *Curr. Opin. Environ. Sustain.* 39, 94–102. doi: 10.1016/j.cosust.2019.08.003

Verian. (2024). School Food Standards compliance pilot: feasibility phase 2 report. Available online at: https://webarchive.nationalarchives.gov.uk/ukgwa/20240802125335mp_/https://www.food.gov.uk/print/pdf/node/23971 (Accessed 29 May, 2025).

Welsh Government. (2024). Roll out of free school meals to all primary school children in Wales complete. Available online at: https://www.gov.wales/roll-out-free-school-meals-all-primary-school-children-wales-complete (Accessed 29 May, 2025).

Wilkinson, T., Nye, C., Lobley, M., West, G., Clappison, A., Hilton, J., et al. (2024). Transforming public food procurement: stakeholder understandings of barriers and opportunities for more localised procurement. *J. Rural. Stud.* 108:103002. doi: 10.1016/j.jrurstud.2024.103281

Yapp, C. (2023). New geographical directions for food systems governance research. *Prog. Hum. Geogr.* 47, 66–84. doi: 10.1177/03091325221133808

Appendix 1: List of interviews 2023–2025 (listed by order of dates of interview)

1. Sustainable Food coordinator (05/01/23) and (21/11/23).
2. Coordinator for Food for Life Scotland (09/01/23).
3. Former local authority Environmental Education coordinator (24/01/23).
4. A project worker for Sustainable Food Places (25/01/23).
5. Food for Life programme manager (27/01/23) and (26/10/23).
6. Local authority caterer (09/02/23).
7. A public health consultant (12/02/23).
8. A member of the public health team (17/02/23) and (25/07/23).
9. Two local authority caterers (20/02/23).
10. A public health consultant and member of the public health team (02/03/23).
11. A local city councillor (07/03/23).
12. A local county councillor (10/03/23).
13. CEO of a MAT and head teacher of an academy (10/03/23).
14. School business manager from a local authority school (12/03/23).
15. A senior local authority catering manager (13/03/23) and (13/01/25).
16. School cooks (16/03/23).
17. Member of team working on School Food Standards pilot at FSA (24/03/23).
18. School catering manager for a private caterer (independent school) (30/03/23).
19. Member of school meals team, DfE (19/04/23). Not for citation.
20. A policy advisor at the Soil Association Food for Life (21/04/23).
21. School cook (06/05/23).
22. Director of a food charity promoting plant-based meals (08/06/23).
23. A Food for Life coordinator (20/06/2023).
24. A former head of local authority catering services (04/10/23).
25. Defra local procurement researcher (10/04/24).
26. A tech entrepreneur supporting dynamic procurement (27/02/25).
27. A local authority School Food Transformation officer (08/04/25).