

January 2026

Evaluating the Impacts of the Hot School Meals Programme

**Submission to the Joint Committee on Education and
Youth**

Introduction

The Ombudsman for Children's Office (OCO) is an independent and statutory human rights body, which was established in 2004 under the Ombudsman for Children Act 2002 (2002 Act). Under the 2002 Act, as amended, the OCO has two core statutory functions:

- to promote the rights and welfare of children up to 18 years of age; and
- to examine and investigate complaints made by or for children about the administrative actions of public bodies, schools and voluntary hospitals that have, or may have, adversely affected a child.

The OCO welcomes the opportunity to engage with the Joint Committee on Education and Youth (Joint Committee) on evaluating the impacts of the Hot School Meals programme (Programme). We welcome the commitment made in the Programme for Government to "continue to expand and improve the Free Hot School Meals programme and ensure that suppliers adhere to robust guidelines on the nutritional value of meals, the dietary requirements of students, reduce food waste and utilise recyclable packaging".¹ The programme is a key measure to ensure Ireland meets its commitment under the EU Child Guarantee for free and effective access to a healthy meal and effective access to healthy nutrition.²

We welcome the expansion of hot school meals funding to all primary schools in Budget 2025 as we are of the view that the Programme is a key measure to address food poverty among children. We support the universal provision of these meals which allows access in a non-stigmatising way to disadvantaged children across the country, not just those in DEIS schools, whilst not identifying these children to their peers as being in need of such additional supports. We also welcome the review of the nutritional standards that is currently being carried out by a CORU-registered dietitian.

In preparing this submission, the OCO has been mindful of the wide-ranging experience and expertise of the many stakeholders who may contribute to this consultation. Correspondingly, the purpose of our submission is to highlight a number of issues, which we believe should be considered in the context of the Committee's work to ensure that the rights of children and young people are more fully protected in this area.

The OCO has engaged with the Department of Social Protection (Department) on different aspects of the Hot School Meals programme since 2019 after concerns about the scheme were brought to our attention by parents and health professionals. At that time we contacted the Department regarding the lack of nutritional guidelines for the meals being provided as part of the pilot Hot School Meals programme. The Healthy Ireland [Nutrition Standards for Hot School Meals](#) were published in 2020. We have since engaged with the

¹ Programme for Government (2025), [Shaping Ireland's Future](#), p. 68.

² Council of the European Union, Council Recommendation 2021/1004 of 14 June 2021 establishing a European Child Guarantee,

Department on the lack of standardised national oversight or monitoring of the nutritional standards and the lack of guidelines for children who require specialised diets. Our submission will focus on these two issues.

Lack of national oversight or monitoring of the nutritional standards

The OCO is concerned at the lack of ongoing independent monitoring of the nutritional content of the hot school meals. While we welcome the work that is currently being undertaken by a dietitian to review the nutritional standards,³ we are aware of anecdotal evidence which indicates that the nutritional content of the actual meals provided may not meet the [nutrition standards](#) in all cases.

Under the United Nations Convention on the Rights of the Child (UNCRC), children have many rights, which are impacted by the provision of school meals. These include the right to life, survival and development (Article 6); the right to an education (Article 28); the right to the highest attainable standard of health, which includes an obligation on the State to take measures to prevent malnutrition through the provision of adequate nutritious food (Article 24); the right to rest, play and leisure (Article 31); and the right to a standard of living adequate for their physical, mental, spiritual, moral and social development, which includes an obligation on the State to provide support to parents, where necessary, particularly with regard to nutrition, clothing and housing (Article 27). As such, the provision of funding for high quality, nutritious school meals helps the State to fulfil some of its obligations in relation to the children's rights mentioned above.

It is our understanding that in most cases, hot school meals are provided to schools by private businesses. In its [General Comment No. 16 \(2013\)](#) on State obligations regarding the impact of the business sector on children's rights, the UN Committee on the Rights of the Child (the Committee) found that States must take action to ensure that businesses activities do not negatively impact on the child's right to life, survival and development, including the promotion of unhealthy food which can have negative long term health impacts. The Committee noted that States are not exempted from their obligations under the Convention when they outsource or privatise services that influence the fulfilment of children's rights. Finally, the Committee also stated that States have an obligation to set standards for businesses to ensure that they are in conformity with the Convention. Each State must also closely monitor them and must recognise that inadequate oversight, inspection and monitoring of these bodies can result in serious violations of children's rights.

³ Department of Social Protection, [Minister Calleary announces expansion of the Hot School Meals Programme and Review of Nutritional Standards](#), 11 April 2025 and Houses of the Oireachtas, Joint Committee on Education and Youth, [Impacts of the Hot School Meals Programme](#), 20 Nov 2025.

In the current system it is the responsibility of individual schools to ensure compliance with the nutritional standards as it is the individual schools who have contracts with their individual provider. However, it is our view that requiring individual schools to fund and source the expertise necessary to ensure that the meals provided meet the nutritional standards would have an impact on already tight school resources. Availability of resources for schools in disadvantaged areas may also lead to disparity in whether the nutritional content of the meals are reviewed or not, which could lead to a situation where some children are provided with nutritionally inferior meals because their schools do not have the necessary resources to have the nutritional content of the meals reviewed.

It is also our view that developing a national system to monitor the quality of the food provided to the children would help ensure value for exchequer funding by ensuring that all children are being provided with the nutritional meals that the scheme was set up to provide.

Recommendation

In order to provide accountability and consistency in the standards of the food provided, the OCO is of the view that independent national monitoring of the nutritional standards of the actual meals provided to children should be developed and implemented. This would ensure a consistent level of monitoring of the nutritional standards of the hot meals provided to all schools participating in the programme.

Lack of guidelines for children who require specialised diets

The OCO is concerned that children who have been diagnosed with disorders requiring specialised medical diets are not being provided for within the Hot School Meals programme. It is our understanding that certain students are being excluded from the Programme as there are no suitable foods on offer. We have been informed that this exclusion has, in some cases, led to reports of bullying and social isolation.

As stated above, children have a right to the highest attainable standard of health, which encompasses the provision of adequate nutritious food to children by State parties. According to the Committee's [General Comment no. 15 \(2013\)](#), in relation to the provision of nutritious food, the Committee emphasises the desirability of schools providing a full meal to children every day, to enhance children's attention for learning and increase school enrolment. However, in order to implement this right effectively, the State must have regard to the other rights contained under the UNCRC. States are required to consider

children's rights when making decisions that impact children, and this should include consideration of any impact that a decision has on a child's best interests (Article 3) and their right to non-discrimination (Article 2). In their [General Comment No. 14](#) (2013) on the right of the child to have his or her best interests taken as a primary consideration, the Committee has stated that the right to non-discrimination requires the State to take appropriate proactive measures to ensure effective equal opportunities for all children. This is so they enjoy their rights under the Convention and this may require positive measures aimed at redressing a situation of real inequality. Children with specialised medical diets are unable to avail of the Programme, meaning they are discriminated against based on their medical status.

We are aware that the meals supplied to children within the Programme are subject to the [Nutrition Standards for Hot School Meals](#). However, the OCO is concerned that these standards do not give guidance to both schools and suppliers in relation to children who may be on specialised medical diets. Although the Nutrition Standards provide for vegetarians, vegans, those with cultural and religious dietary requirements and those with allergies i.e. gluten intolerance, there is no mention of medical dietary requirements. For example, children who have conditions such as phenylketonuria (PKU)⁴, galactosaemia⁵ and homocystinuria⁶ need their meals modified to avoid certain foods such as high-protein foods, foods with aspartame or foods with lactose and galactose. Notably, there is a high rate of galactosaemia amongst Travellers in Ireland⁷ meaning that the lack of specialised diets may impact on this cohort of children, who are already severely disadvantaged.

It is our understanding that schools are required to choose their own school meals provider in accordance with Public Procurement rules, and that the tender documentation requires that the menu accommodates those with food intolerances and allergies, from lactose-free to vegetarian to gluten-free. However, there is no guidance provided to schools or suppliers in relation to the adaptation of meals to accommodate children with specialised medical diets. The OCO has been informed that in practice, even if suppliers are willing to engage with schools and parents around providing specialised meals for these children, suppliers are unable to meet this demand. Providing for this cohort of children would involve having to cook separate specialised meals, which would require guidance on how to prepare them, and additional resources, which the Department does not provide. Therefore, due to a lack of guidance in relation to children with disorders requiring specialised meals, this cohort of children are being excluded from the Programme.

⁴ HSE (2022), Phenylketonuria (PKU) Paediatric and Adult Care Pathway, pp. 4 – 5.

⁵ HSE (2025), [Classical Galactosaemia \(C Gal\)](#) and NHS Scotland (2017), [Galactosaemia](#).

⁶ HSE (2021), [Homocystinuria : symptoms, causes, diagnosis and treatments](#).

⁷ Children's Health Ireland (2026), [Offering Carrier testing for Galactosemia to Irish Traveller women attending the Rotunda Hospital](#).

Recommendation

In order to ensure that all children can avail of the Hot School Meals Programme on an equal basis, we would encourage the provision of nutritional guidance in relation to the adaptation of meals to accommodate children with specialised medical diets along with additional funding for these specialised meals in order to address the issues raised above.