

Members of the House of Lords  
Palace of Westminster  
LONDON  
SW1A 0AA



**10<sup>th</sup> June 2025**

Dear Member of the House of Lords,

We write to you in relation to your current consideration of the Children's Wellbeing and Schools Bill. As a broad coalition of charities and third sector organisations in the children's sector we want to highlight our concerns that the provisions relating to breakfast clubs, as currently drafted, may not properly address the needs of children with Special Educational Needs and Disabilities (SEND).

The Bill will deliver on the Labour Government's manifesto commitment to offer universal breakfast clubs for all primary-aged children in England. Delivering on this commitment will take us significantly closer to ending morning hunger in schools across England and is extremely welcome. Our concern, however, is that the policy has been designed for mainstream pupils and risks ignoring the needs of those with Special Educational Needs and Disabilities.

We are therefore calling on members of the House of Lords to:

- support extending the school breakfast provisions in the Bill to include secondary aged pupils in special schools.
- enshrine in law a right to access services needed to participate in a breakfast club, including school transport and one to one support.
- mandate in law that the Secretary of State promotes mixed models of school breakfast provision.

At committee stage, you are being asked to consider a range of amendments which will make school breakfast provision more accessible for SEND pupils and will create a more person-centred approach to provision. Whilst most pupils with SEND are in mainstream education, special provision is vital for many children and young people across the country. Their barriers to accessing education are different and need to be supported by Government.

The proposed policy of universal free breakfasts applies only to primary aged pupils, which will mean excluding secondary aged pupils in special schools from breakfast provision. This is both inequitable and unworkable. Special schools are more likely to be all-through settings than mainstream schools, where children can be taught based on need rather than age group. We recommend voting to support Lord Watson's amendments 183D and 186A to extend school breakfast provisions in the Bill to include secondary aged pupils in special schools.

The Bill makes provisions for breakfast clubs to be available for all primary pupils but the Bill must be amended to ensure that they are accessible for children with SEND. Many of these children access school transport funding, it is vital that schools and local authorities work with families to create flexible transport approaches so anyone wanting to access breakfast clubs can. Additionally, some children with SEND access one to one support during the school day. This support is a vital key in unlocking the educational system to young people. Without funding for this support being extended to breakfast clubs they will be locked out. We recommend voting to support any amendment which would ensure that breakfast clubs are accessible for pupils with SEND, particularly Lord Holmes of Richmond's amendment 186.









Whilst breakfast clubs need to be accessible, they may not always be the right option. Schools should be both empowered and encouraged to deliver a mixed model approach to breakfast provision. This is where models such as those delivered in the classroom or in nurture groups are delivered alongside breakfast clubs. Embedding mixed models into a school's approach ensures all pupils have an equitable access to breakfast provision. Breakfast clubs are harder to access for pupils with SEND which is why in special school provision, only 16% of schools partnering with the charity Magic Breakfast operate a breakfast club without another style of school breakfast delivered as well.

Many pupils with SEND, especially those with significant and complex needs, require person centred support. One-size fits all before school breakfast clubs aren't always able to offer the level of person-centred support necessary, especially for pupils with SEND. Classroom breakfast models and other mixed model alternatives can be designed around the needs of young people and can take a less prescriptive approach across a morning. We recommend voting to support Baroness Lister of Burtersett's amendment 187 to extend school breakfast provisions in the Bill to include the promotion of mixed models.

These changes will ensure that the Children's Wellbeing and Schools Bill can better deliver for children with SEND. The proposed changes do not affect the intentions of the

Bill but rather ensure that they can be realised. For more information, please contact [advocacy@magicbreakfast.com](mailto:advocacy@magicbreakfast.com) to discuss any of these recommendations.

Yours

Dr Lindsey MacDonald	Chief Executive	Magic Breakfast	
Cheryl Ward	Chief Executive	Family Fund	
Dr Rhidian Hughes	Chief Executive Officer	Voluntary Organisations Disability Group	
Rosalind Luff	Director – London	National Network of Parent Carer Forums C.I.C.	
Pilar Cloud	Chief Executive	Action Cerebral Palsy	
Katie Ghose	Chief Executive Officer	Kids	
Gillian Doherty	Co-Director	Special Needs Jungle	
James Watson-O'Neill	Chief Executive	Sense	
Carol Boys	Chief Executive	The Down's Syndrome Association	
Ellen Broomé	Chief Executive Officer	British Dyslexia Association	