ARUP

Greater London Authority (GLA)

Universal Free School Meals (UFSM)

Interim Equality Impact Assessment

Reference: Interim EqIA

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Contents

Tables

Figures

Drawings

No table of figures entries found.

Pictures

No table of figures entries found.

Photographs

No table of figures entries found.

Attachments

No table of figures entries found.

Appendices

No table of contents entries found.

Glossary of abbreviations and terms

Abbreviations

Abbreviations	Definition
CPAG	Child Poverty Action Group
DfE	Department for Education
DWP	Department for Work and Pensions
EHCP	Education, health and care plan
EqIA	Equality Impact Assessment
FSM	Free School Meal
GCSE	General Certificate of Secondary Education
GLA	Greater London Authority
IIA	Integrated Impact Assessment
IMD	Index of Multiple Deprivation
LGBTQ+	LGBTQ+ stands for lesbian, gay, bisexual, transgender, queer (or sometimes questioning) and others. The "plus" represents other sexual identities, including intersex, asexual, pansexual and Two-Spirit.
NS-SeC	National Statistics Socio-economic Classification
LA	Local Authority
LB	London Borough
LLW	London Living Wage
MHCLG	Ministry of Housing, Communities & Local Government
Ofsted	The Office for Standards in Education, Children's Services and Skills
ONS	Office for National Statistics
PSED	Public Sector Equality Duty
SEND	Special educational needs and disabilities
SEN	Special education needs
UFSM	Universal Free School Meal

Terms

Terms	Definition
Baseline	Existing conditions against which future changes can be measured
Equality Impact Assessment	A predictive assessment of the possible equality effects arising from the design and implementation of a proposed plan, policy, project or strategy for people sharing one or more protected characteristics
The Equality Act	Act of Parliament that consolidates previous legislation – including the Sex Discrimination Act 1975, the Race Discrimination Act 1976, and the Disability Discrimination Act 1995 – designed to prohibit discrimination on the grounds of those protected characteristics described in the Act
Free school meals (FSM)	This refers to the current scheme of FSM.
Integrated Impact Assessment	The IIA is a means by which different technical assessments are brought together in a holistic and integrated manner. For the IIA for UFSM, this includes Environmental, Equality, Health, and Economic, Impact Assessments.
Key Stage 1	A phase of primary education for pupils aged 5 to 7 in England

Terms	Definition
Key Stage 2	A phase of primary education for pupils aged 7 to 11 in England
Protected Characteristics	Nine groups identified in the Equality Act 2010 as sharing a particular characteristic against which it is illegal to discriminate: • Age; • Disability; • Gender reassignment; • Marriage and civil partnership; • Pregnancy and maternity; • Race; • Religion or belief; • Sex; and • Sexual orientation.
Public Sector Equality Duty (PSED)	The PSED requires public authorities in exercising their functions, to have due regard to the need to : (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010; (b) advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it; (c) foster good relations between people who share a relevant protected characteristic and people who do not share it.
Pupil premium	The pupil premium is a grant given by the government to schools in England to decrease the attainment gap for the most disadvantaged children, whether by income or by family upheaval. For each pupil who is eligible for free school meals or has claimed free school meals in the last six years, their school receives financial income.
Proposed policy	Proposed one-off £130m funding that aims to ensure that all primary school children in state-funded primary schools in the capital can receive free school meals (FSM) for the 2023/2024 academic year
SEND	Special educational needs and disabilities (SEND) is a term used to describe learning difficulties or disabilities that make it harder for a child or young person to learn compared to children of the same age.
Study Area	Defined area where the proposed policy will be applied (across all London Boroughs). It is used as a geographical basis for reporting local community impacts and effects
Universal free school meals (UFSM)	This refers to the proposed policy to universally provide all primary school children in London with a free school meal.

Executive summary

The London Mayor proposes a one-off £130m of funding to provide all primary school children in state-funded schools in the capital free school meals (FSM) for the 2023/2024 academic year. This would benefit around 270,000 extra primary school children and save families in London around £440 per child across the year. The aim of the scheme is to help families with the spiralling cost of living, as well as reducing the stigma associated with free school meals.

This Equality Impact Assessment (EqIA) aims to systematically identify and assess the potential impacts and effects, both positive and negative, and identifies areas for mitigation of any negative effects identified or enhancement of any positive effects, arising from the proposed policy, for people sharing one or more protected characteristics as defined by the Equality Act 2010. These protected characteristics comprise; age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. Socioeconomic inequality is not currently a protected characteristic under the Equality Act; however, the assessment has considered the potential effects of the strategy for people on the basis of socioeconomic status.

The proposed policy is assessed as potentially having the following positive effects for a range of protected characteristic groups:

- In relation to the protected characteristic of age, it is anticipated that there would be positive benefits for nutrition, mental health and wellbeing, and academic learning and attainment. This would bring most benefits to the recipient age group (7-11) but are also likely to extend beyond this group, bringing benefits to other family members including older and younger children, and also parents, as a result of freeing up financial resources to spend on food for other family members.
- By providing universal provision of free school meals, it is anticipated that the stigma around receiving free school meals would be reduced. This would bring benefits for mental health. This benefit would be more prevalent amongst low-income families who may be struggling with the cost-of-living crisis. The data indicates that pupils from ‘black’ or ‘mixed’ ethnic groups are, as a grouping, proportionally more likely to be eligible for FSM and therefore more likely to be subject to the stigma associated with this.
- It would also make it easier for those who meet the eligibility criteria for FSM, but do not currently claim it due to issues with navigating the system or completing the necessary forms, to receive this benefit. This is likely to include those from ethnic minority groups for whom English is not their first language.
- For those that currently are struggling with the cost-of-living crisis or who are living in relative poverty, but do not meet current eligibility criteria, universal provision will help to ease financial struggles and ensure that children receive a good quality, nutritious meal. This includes those in low-income families. This is particularly an issue in London where living costs (particularly rents) are higher. One threshold for the whole of the UK means that many families living in relative poverty are not eligible for FSM under the current government criteria.
- The receipt of a free school meal may have benefits for improving attendance both through reduced health related absence but also accessing a free lunch being a motivating factor.

This EqIA also identifies areas for further work or consideration with regard to the proposed policy. Some of these recommendations relate to the current pilot for the academic year 2023-2024: whilst others relate to potential for learning from the pilot, or longer-term considerations should the pilot scheme extend beyond the current academic year. These include:

- The need to address concerns about whether a Universal Free School Meal (UFSM) policy will meet the dietary needs and requirements for all faith groups, particularly for those pupils within non-faith schools; and whether this will affect take-up, and hence the financial benefits, amongst these faith communities.

- Some concerns also exist over the price point of £2.65 per child and whether this is enough to cater for certain faith groups dietary needs including Halal meals for Muslim people and Kosher meals for Jewish people. A number of recommendations have been made in this EqIA as to how this issue might be addressed including an increase in the number of vegetarian and fish options to suit a greater range of cultural/faith needs; and analysis of additional funding that would be required to meet the needs of faith communities. It is also recommended that monitoring is undertaken during the pilot around the number of children, by different faith groups, taking up UFSM.
- Similar issues exist around the dietary needs and requirements, and price point, for meals for children with special educational needs and disabilities (SEND) and SEND schools. Some of these children are more likely to have specific dietary needs. Recommendations to address this include contingency funding for any extraordinary costs that are a barrier to children accessing the scheme.
- Concerns also exist around whether UFSM will reduce the numbers eligible for FSM, provided at national government level, actually signing up for that FSM scheme. This could potentially impact on Pupil Premium, with potential repercussions for school's financial resources. Grant conditions for schools have tried to address this by encouraging consideration of best practice in promoting registration (and the benefits to schools) including models where all parents are required to complete registration which would capture those eligible for UFSM and Pupil Premium.
- Concerns have also been identified through the assessment about potential 'drop-off' impacts at the end of the one-year pilot period if household finances have adjusted to a 'new normal'.

1. Introduction

1.1 Purpose of the report

Undertaking an EqIA is a means of systemically identifying and assessing the potential impacts and effects arising from the design and implementation of a proposed plan, policy, project or strategy for people sharing one of more protected characteristics as defined under the Equality Act 2010.

Under Section 149 of the Act, all public bodies are required to have due regard to the need to:

- eliminate discrimination, harassment, victimisation and other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristics and people who do not; and
- foster good relations between people who share a protected characteristic and people who do not.

This is known as the Public Sector Equality Duty (PSED).

Although low-income or socio-economic inequality are not identified 'protected characteristics' under the Act in England, low-income groups have also been included as part of this assessment because low-income and deprivation typically overlap with other protected characteristics such as disability and ethnicity and are relevant to achieving inclusive growth.

An EqIA provides evidence to show how equalities issues have been identified and considered as part of the development of a policy, plan or strategy, and documents how these considerations have influenced the decision-making process. It also ensures that measures can be put in place to mitigate any potential adverse effects for protected characteristic groups, to secure the potential benefits, and to promote equality of opportunity.

EqIA is an ongoing process and should be reviewed and updated throughout the development of the plan to reflect any challenges or opportunities that emerge, and to ensure that the plan development takes account of any key equality issues raised by stakeholders and local communities.

1.2 The proposed policy

The London Mayor proposes a one-off £130 million of emergency funding to provide all school children in state-funded primary schools in the capital in Key Stage 2 years with universal provision of free school meals (UFSM) for the 2023/2024 academic year. This emergency funding would help around 270,000 extra primary school children and save families in London around £440 per child across the year. The aim of the scheme is to help families with the spiralling cost of living.

The Mayor of London will fund the price per meal at £2.65 as a single standard offer across all boroughs. Currently there is a wide variance in current FSM unit costs, including where there is already a universal offer across and within boroughs in London. Drivers for this variance relate to a range of issues including paying London Living Wage to school staff, adherence to healthy food standards above and beyond the School Food Standard, and the scope and status of current contracts for catering provision. The £2.65 price per meal for the UFSM London scheme is a single flat rate in line with the approach taken by government; this is above the standard government rate of £2.41. The current proposal is for all schools to receive a grant based on an assumed 90% uptake. However, those boroughs that are able to evidence a higher uptake will receive further funding. Boroughs who currently fund Universal Free School Meals (UFSM) will be allocated funding as if they were not currently providing the function. The Mayor hopes that these boroughs will use the offset funds to support families in financial hardship.

City Hall has highlighted that the Mayor's proposed policy is consistent with the Government's existing funding of school meals, as outlined in DfE guidance[1], in that it would cover state-funded primary schools,

[1] DfE. 2023. Free School Meals. Guidance for local authorities, maintained schools, academies, and free schools. Available online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1133262/Free_school_meals.pdf

pupil referral units and special schools, including maintained schools, academies, and free schools (including faith schools), but not private or independent schools. Based on these current working assumptions, City Hall acknowledge that there are some communities within London whose children largely attend private settings or independent schools and therefore will not benefit from this funding. City Hall have conducted supplementary analysis on the private and independent school sector to explore the potential impact the proposed policy could have on those children not attending state-funded settings and whether there is a need to extend the policy beyond the proposed remit. This supplementary analysis by the GLA Highlights that the majority of children in independent schools pay fees in the order of £6-7k a term and therefore generally come from more affluent households. It also acknowledges that there are some families of children in independent schools, particularly those in the independent faith school sector, where a greater number of schools are charitable institutions funded by parents and the community, that are unable to pay school fees, live in larger than average sized families and receive housing benefits and tax credits. Such families are facing financial hardship due to the cost-of-living crisis, specifically the rising costs of food products to meet dietary needs linked to faith. It is unclear the numbers that may fall within this category.

City Hall have noted that the Mayor continues to do all he can to support Londoners of all backgrounds affected by the cost-of-living crisis and the UFSM scheme is just one measure within a range of steps the Mayor is taking to help Londoners deal with the crisis. For example, the Mayor will fund more than 10 million meals for children during school holidays and at weekends over the next year through a partnership with The Felix Project and Mayor's Fund for London. The Mayor is also investing an additional £3.6 million to work with community partners including the Mayor's Fund for London and the Felix Project to provide free holiday meals to families who need the support the most. As part of this programme, City Hall is working specifically with community groups from communities who currently cannot access the UFSM scheme (including pupils in private settings or independent schools) to ensure that these groups are supported by the holiday meals scheme.

As well as saving families hundreds of pounds per child, making free school meals available to all helps reduce the stigma that can be associated with being singled out as low income, therefore boosting take-up among families who need them most. The meals are also good for children's health as they may be the child's main source of food. By ensuring they do not go hungry, children are better equipped to learn.

1.3 Background

Currently all state-funded school children at Key Stage 1 (KS1), which is reception through to year 2, receive a free school meal. Beyond that, in KS2, which includes primary school children in years 3-6, only those that meet specific eligibility criteria for FSM currently receive a free school meal.

The exception to this is a handful of London boroughs (LB's) who have already implemented UFSM for all primary school pupils. These include:

- LB Southwark – this London Borough has funded healthy free school meals to all children in primary schools for the last ten years. Southwark is now rolling out a pilot scheme for secondary school pupils.
- LB Newham - this London Borough has funded healthy free school meals to all children in primary schools since 2009, so for the last 14 years.
- LB Tower Hamlets – this London Borough has been providing free school meals to all primary school children since 2014, so for the last 9 years. Tower Hamlets is now also rolling out a pilot scheme for secondary school pupils up to year 11.
- LB Westminster - this London Borough has been providing free school meals to all primary school children since 2013, so for the last 10 years. This year, the borough is extending the scheme to include all children in nursery year and in secondary school up to the age of 14.
- LB Islington – this London Borough has been providing free school meals to all primary school children since 2011, so for the last 12 years.

Research by the Child Poverty Action Group (CPAG)[2] has shown that hundreds of thousands of schoolchildren live in poverty but are not currently eligible for free school meals.

Currently a household on universal credit can earn no more than £7,400 a year (after tax and not including benefits), regardless of the number of children in the family, to be eligible for free school meals. As a result, most families are not eligible.

In addition, although data on eligible school children is held at government level, the current process means that parents have to formally apply to their local authority, or via their child's academy school to claim for free school meals. Government estimates on claim rates indicate that around 11% of school children who are eligible for FSM have not taken up the offer. There is no information available to explain this finding.

Historically, families who were undocumented, due to their immigration status, and/or with no recourse to public funds (i.e., no entitlement to the majority of welfare benefits including income support, housing benefits and a range of allowances and tax credits) were not entitled to FSM under the current eligibility criteria. However, a scheme to make FSM available to these families was introduced during Covid and permanently extended to all households with no recourse to public funds (NRPF) in January 2023.

[2] https://cpag.org.uk/news-blogs/news-listings/region-number-children-poverty-not-eligible-free-school-meals

2. EqIA Methodology

2.1 Approach to the assessment

EqIA is a qualitative assessment which considers the potential for projects, policies or strategies to result in effects for groups of people with protected characteristics that are 'disproportionate' or 'differential'.

- A disproportionate equality effect arises where people with protected characteristics are likely to be impacted in a way that is proportionately greater than other members of the population, for example where a particular group makes up a higher-than-average proportion of an affected population.
- A differential equality effect arises where people with protected characteristics are likely to experience a change differently to other members of the affected population because of a particular sensitivity.

This assessment has reviewed the proposed UFSM policy and considered the potential for each action to result in disproportionate or differential equality effects. The potential effects of the measures have been considered for all protected characteristics, with the exception of marriage and civil partnership. Under the Act, marriage and civil partnership is considered a protected characteristic only in relation to discrimination in the workplace and is therefore outside the scope of this assessment. Socioeconomic inequality is not currently a protected characteristic under the Equality Act; however, the assessment has considered the potential effects of the strategy for people on the basis of socioeconomic status.

The assessment includes recommendations for measures that should be put in place as the proposed policy evolves, to reduce or remove potential adverse equality effects, to strengthen potential positive equality effects, and to ensure that, where possible, the proposed policy promotes equality of opportunity.

2.2 Study area

The study area includes the whole of the Greater London Area and includes the following 33 Local Authorities (LAs):

1. Barking and Dagenham	18. Hounslow
2. Barnet	19. Islington
3. Bexley	20. Kensington and Chelsea
4. Brent	21. Kingston upon Thames
5. Bromley	22. Lambeth
6. Camden	23. Lewisham
7. City of London	24. Merton
8. Croydon	25. Newham
9. Ealing	26. Redbridge
10. Enfield	27. Richmond upon Thames
11. Greenwich	28. Southwark

12. Hackney	29. Sutton
13. Hammersmith and Fulham	30. Tower Hamlets
14. Haringey	31. Waltham Forest
15. Harrow	32. Wandsworth
16. Havering	33. Westminster
17. Hillingdon	

These Local Authorities are mapped in Figure 1, below.

Figure 1: Local Authorities in the study area

2.3 Review of relevant plans, programmes, strategies and objectives

A review of relevant local and regional equalities policy documents and strategies has been undertaken to identify key equalities issues and priorities for the Greater London area.

The following documents were reviewed:

- The London Food Strategy (2018)[3];
- The London Health Inequalities Strategy (2018)[4];
- The Mayor's Equality, Diversity and Inclusion Strategy (2018)[5];
- The London Plan (2021)[6]; and
- The London Environmental Strategy (2018)[7].

Key considerations of relevance to the assessment of equalities effects include:

- Support education institutions to reduce health inequalities;
- Support UFSM to reduce food insecurity;
- Support parents and carers to give all children the best possible start to life; and
- Support collaboration between groups helping on the food needs of vulnerable groups.

2.4 Assumptions and limitations

The following assumptions and limitations apply to this EqIA:

- The proposed policy is aligned with the government's current FSM scheme, based on existing government funding, and as set out in DfE guidance, which does not extend to pupils within private or independent schools. Engagement and analysis has highlighted a need to further investigate the potential impact and effects of the policy on schools across the whole education sector including independent schools. This additional analysis has been conducted by GLA Economics and can be found as a supplementary paper to this EqIA.
- Census data has been used to compile a large proportion of the baseline profile. Where possible, data from the most recent census (March 2021) has been used. It is worth noting that the 2021 census was conducted during a COVID-19 lockdown period, and respondents were asked to complete the census based on where they were living at that moment in time. It may therefore not be an accurate reflection of London's current demography.
- With regard to faith, the assessment has focused on those key faiths for which census data on prevalence is available including Christian, Muslim, Hindu, Buddhist, Sikh and Jewish faiths. However, there is an awareness that other faiths also exist, and members of these communities may also have specific dietary needs associated with their beliefs, including, but not limited to, Rastafarian, Church of the Latter Day Saints, and Seventh Day Adventists.

[3] GLA, 2018. The London Food Strategy. Available online at: https://www.london.gov.uk/sites/default/files/final_london_food_strategy.pdf

[4] GLA, 2018. The London Health Inequalities Strategy. Available online at: https://www.london.gov.uk/sites/default/files/health_strategy_2018_low_res_fa1.pdf

[5] GLA 2018. The Mayor's Equality, Diversity and Inclusion Strategy. Available online at: https://www.london.gov.uk/sites/default/files/mayors-equality-diversity-inclusion-strategy.pdf

[6] GLA, 2021. The London Plan 2021. Available online at: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

[7] GLA, 2018. London Environmental Strategy. Available online at: https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf

3. Baseline profile

3.1 Population

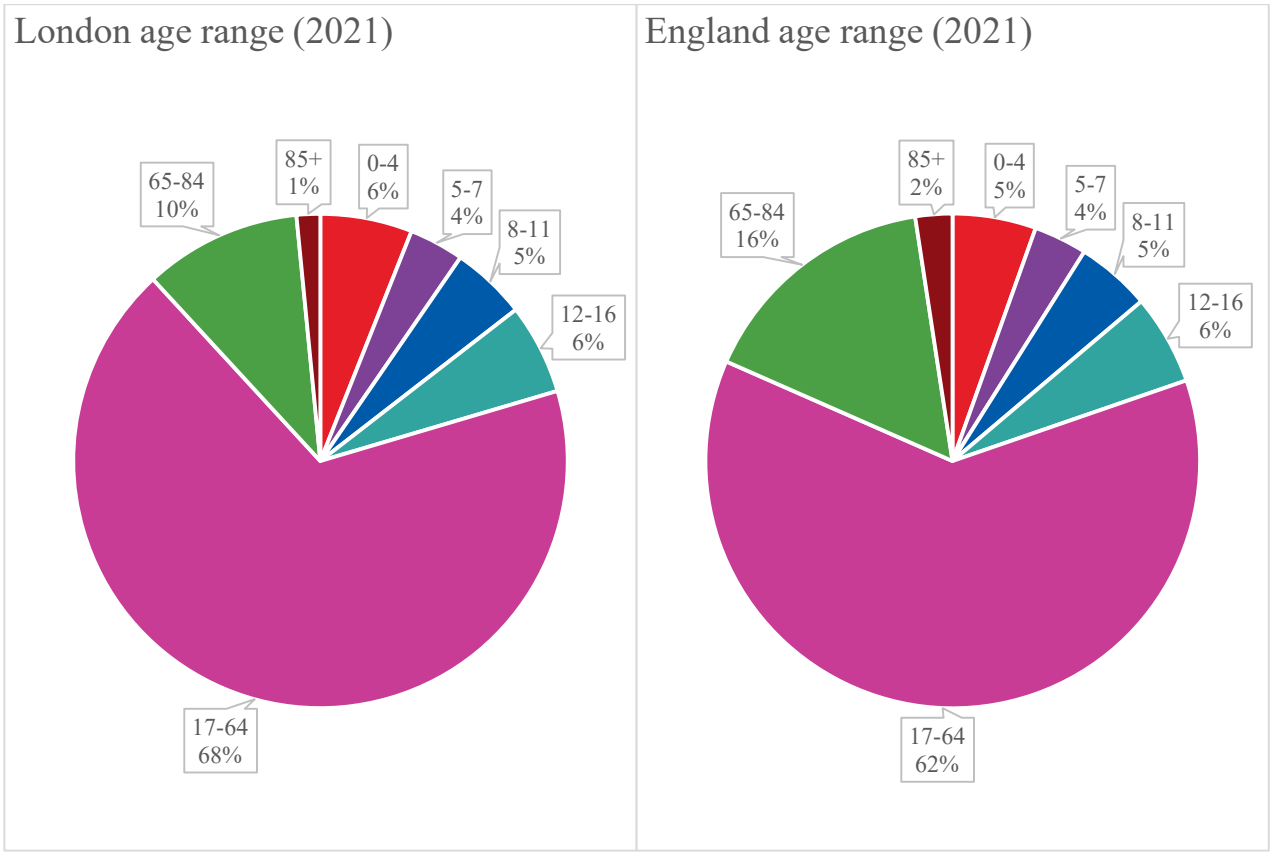
The population of London is around 8.8 million people[8]. According to the GLA's population projections that were published in 2023, London's population is expected to rise to about 10 million by 2040[9]. This positive trend is consistent across every London borough, although there will be more growth in some boroughs compared to others. Specifically, Barking and Dagenham's population is projected to increase the most from 2021 to 2040, whilst Westminster's population is projected to drop by less than 1% over that same period[10].

The projected increase in London's population is not consistent across different age groups. The proportion of individuals aged 16-64 and 65 years and over is expected to increase, whereas the proportion of individuals aged 0-15 is expected to decrease[10] indicating an ageing population.

3.2 Age

As per Figure 2, the age breakdown of London's population aged 16 and under is relatively similar to that for England. There is however a higher proportion of individuals ages between 17 and 64, and a lower proportion of individuals aged between 65 and 84 in London compared to England.

Figure 2: Population age breakdown



[8] ONS mid-year estimates, 2021. Sex by single year of age. Available online at: https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates.

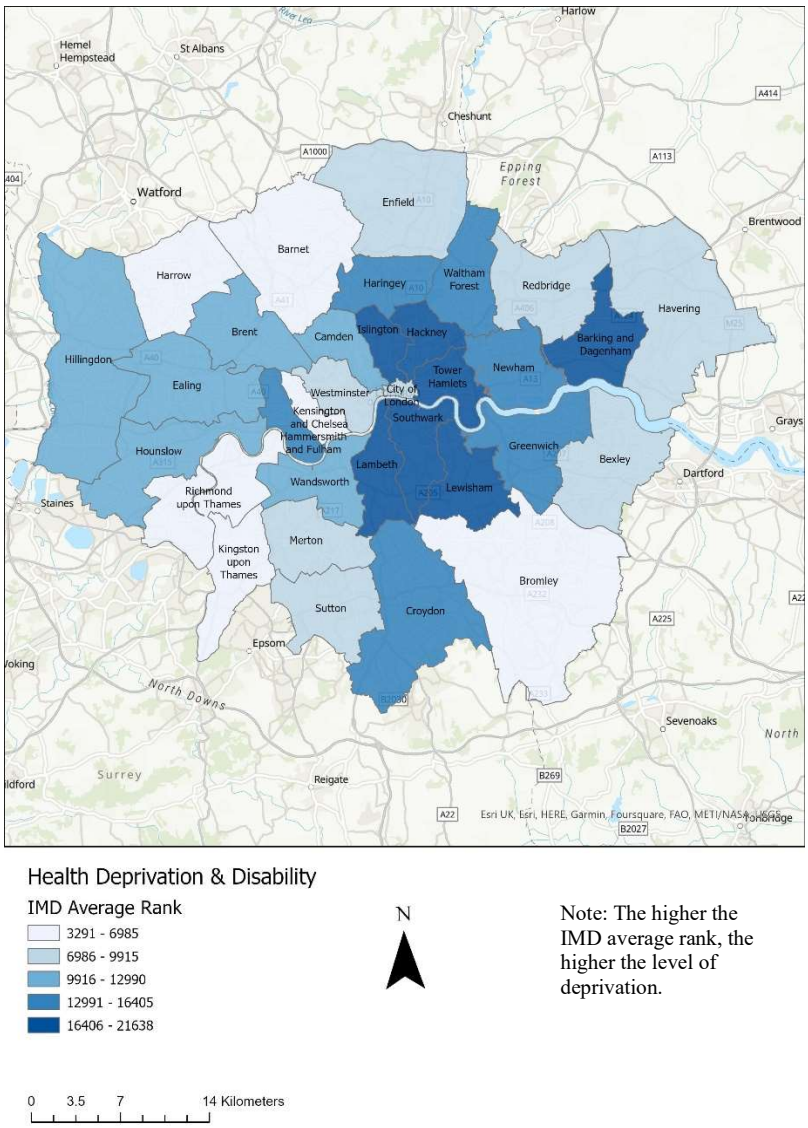
[9] GLA Housing-led population projections, 2023. Housing-led population projections - London Datastore

[10] GLA Housing-led population projections, 2023. Housing-led population projections - London Datastore

3.3 Disability

The IMD Health deprivation and disability domain measures the risk of premature death and the impairment of quality of life through ill health or disability. Figure 3 indicates that Barking and Dagenham, Lambeth, Southwark, Lewisham, Tower Hamlets, Hackney and Islington are relatively deprived in terms of health and disability[11].

Figure 3: Health deprivation and disability in London (2019)



3.3.1 SEND schools in London

Across London there are 156 state-funded special educational needs and disabilities (SEND) schools[12]. The total number of children in these schools is 21,247. In London, the total number of SEND pupils in Year 3 were 1,172 in 2021/22, slightly higher in Year 4 at 1,176 and Year 5 at 1,260 and the highest number recorded was for Year 6 at 1,357. For Years 3,4 and 5 the highest recorded numbers were in Croydon, and for Year 6 the highest recorded number of pupils was in Enfield.

[11] MHCLG, 2019. ID – Health Deprivation and Disability. Available online at: https://data.london.gov.uk/dataset/indices-of-deprivation

[12] Explore education statistics, 2022. Special education needs in England. Available online at: https://explore-education-statistics.service.gov.uk/find-statistics/school-pupils-and-their-characteristics/2022-23/

3.3.2 Free school meals for children at SEND schools

Based on the 2022 national statistics for special educational needs in England[13], 37% of children in London's state-funded schools with special educational needs (SEN) support and education, health and care plan (EHCP) are eligible for free school meals. This is slightly below the national average at 38%. The highest percentage of SEND children eligible for free school meals are found in Islington with 54%. The lowest is seen in Redbridge with 22%.

According to a Department for Education 2022 publication[14], eligibility for free school meals in children with special educational needs was 20% higher than for children without special educational needs.

3.3.3 SEND and ethnicity

The majority of SEND pupils in state-funded primary schools (all years) in London identify as 'white' (42%)[15]. This majority is followed by pupils who identify as black (20%), Asian (19%), mixed (13%) and Other (6%). These figures, along with Local Authority-specific data, are presented in Table 1, below.

Table 1: The number of SEND pupils by ethnicity in state-funded primary schools across London (2021/22)

Local Authority	White	Mixed	Asian	Black	Other
London	**35,797 (42%)**	**10,787 (13%)**	**16,343 (19%)**	**17,270 (20%)**	**4,929 (6%)**
City of London	19	11	20	3	4
Barking and Dagenham	1,314	324	851	799	57
Barnet	1,896	428	355	420	395
Bexley	1,750	257	181	350	33
Brent	847	249	698	757	388
Bromley	2,249	400	156	336	35
Camden	703	257	341	304	91
Croydon	1,539	675	543	1,100	69
Ealing	936	344	945	550	590
Enfield	1,628	343	183	796	155
Greenwich	1,794	494	363	1,078	79
Hackney	901	383	316	976	173
Hammersmith and Fulham	449	186	84	294	134
Haringey	1,222	313	149	678	215
Harrow	613	231	867	224	126
Havering	1,476	180	187	209	24
Hillingdon	1,668	436	846	297	212
Hounslow	1,271	337	1,063	418	353
Islington	1,000	416	146	466	135
Kensington and Chelsea	302	185	31	181	124
Kingston upon Thames	1,086	217	223	44	87
Lambeth	762	432	102	1,200	142
Lewisham	1,207	604	182	1,154	128
Merton	1,118	286	405	334	49
Newham	702	353	1,900	795	178

[13] UK Government, 2022. Special educational needs in England. Available online at: https://explore-education-statistics.service.gov.uk/find-statistics/special-educational-needs-in-england

[14] Department for Education, 2022. Special educational needs and disability: an analysis and summary of data sources. Available online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1082518/Special_educational_needs_publication_June_2022.pdf

[15] UK Government, 2022. Special educational needs in England. sen_fsm_ethnicity_language. Available online at: https://explore-education-statistics.service.gov.uk/find-statistics/special-educational-needs-in-england

Local Authority	White	Mixed	Asian	Black	Other
Redbridge	707	262	1,316	312	40
Richmond upon Thames	1,036	160	109	35	39
Southwark	1,044	457	170	1,382	261
Sutton	1,429	208	293	161	48
Tower Hamlets	600	364	2,120	312	96
Waltham Forest	1,151	411	657	545	104
Wandsworth	1,060	431	397	567	110
Westminster	318	153	144	193	255

3.3.4 SEND and links to poverty

The Joseph Rowntree Foundation published research which examines the links between SEND and poverty in the United Kingdom.[16] Department for Education (DfE) statistics provided in the report show there are clear links between SEND and children living in poverty. Of the pupils who are eligible for free school meals in England,[17] 28.7% are identified as having SEND. The coincidence of SEND among those currently eligible for FSM is higher than amongst those who are not eligible.

The report also identifies that children with SEND are six times more likely to be excluded compared with their peers who do not have SEND, and 74% of all permanently excluded pupils have some form of identified SEND. There are clear links with poverty too:

- children in receipt of free school meals are four times more likely than their peers to be excluded.
- children in schools with the highest intake of children from low-income families are excluded more than 40% more than children in the schools with the least disadvantaged intake.

There is some evidence that ethnicity plays a part in children's likelihood of being identified as having SEND. Greater understanding of the links between ethnicity, SEND and poverty is needed, in particular for at-risk groups such as children from Gypsy, Roma and Traveller communities.

3.4 Ethnicity

3.4.1 London's ethnic profile

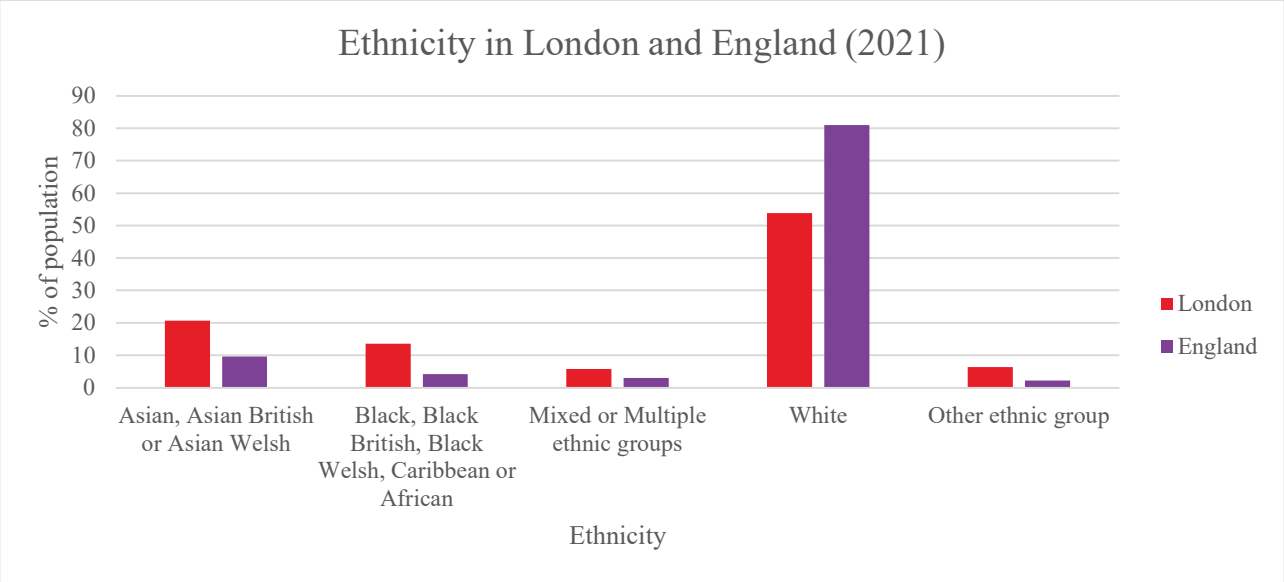
As shown in Figure 4, London is more ethnically diverse than England. At 54%, the proportion of individuals identifying as 'white' in London is much lower than the English average of 81%. A larger proportion of the population in London identify as Asian, black, mixed and/or other[18], compared to the rest of England.

[16] Joseph Rowntree Foundation (2016) Special educational needs and their links to poverty

[17] Eligibility for free school meals is a commonly used proxy for children living in poverty, albeit with widely recognised weaknesses.

[18] ONS, 2021. Ethnic group. Available online at: https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2095

Figure 4: Ethnicity in London and England



3.4.2 Primary school pupil ethnicity

According to 2022 data[19], the majority of primary school pupils (all years) in London identify as 'white' (281,277 pupils (38%)), followed by 'Asian' (210,763 (29%)), 'black' (111,028 (15%)), 'mixed' (85,546 (12%)) and then 'any other ethnic group' (43,502 (6%)).

Table 2: Pupil ethnicity in London (2019)

Local Authority	Any other ethnic group	Asian	Black	Mixed	White
London	**43,502 (6%)**	**210,763 (29%)**	**111,028 (15%)**	**85,546 (12%)**	**281,277 (38%)**
Barking and Dagenham	447	8,483	5,380	2,251	8,183
Barnet	3,489	7,780	2,747	3,386	15,991
Bexley	362	3,434	3,371	2,246	13,244
Brent	3,819	11,984	4,642	2,150	7,164
Bromley	454	3,243	2,458	3,728	17,849
Camden	771	3,008	1,656	1,506	4,257
City of London	17	134	15	47	75
Croydon	834	7,074	7,962	5,336	11,200
Ealing	5,341	14,634	3,578	3,097	8,701
Enfield	1,732	4181	5,754	3,662	15,597
Greenwich	758	3,829	7,065	3,358	10,845
Hackney	1,148	3,416	5,619	2,529	6,618
Hammersmith and Fulham	1,094	1,867	1,765	1,483	3,867
Haringey	1,639	3,098	4,065	2,833	10,565
Harrow	1,034	12,340	1,410	1,835	6,063
Havering	293	4,123	2,488	2,282	15,636
Hillingdon	2,513	12,320	2,513	3,803	10,246
Hounslow	2,439	11,516	2,054	2,281	7,436

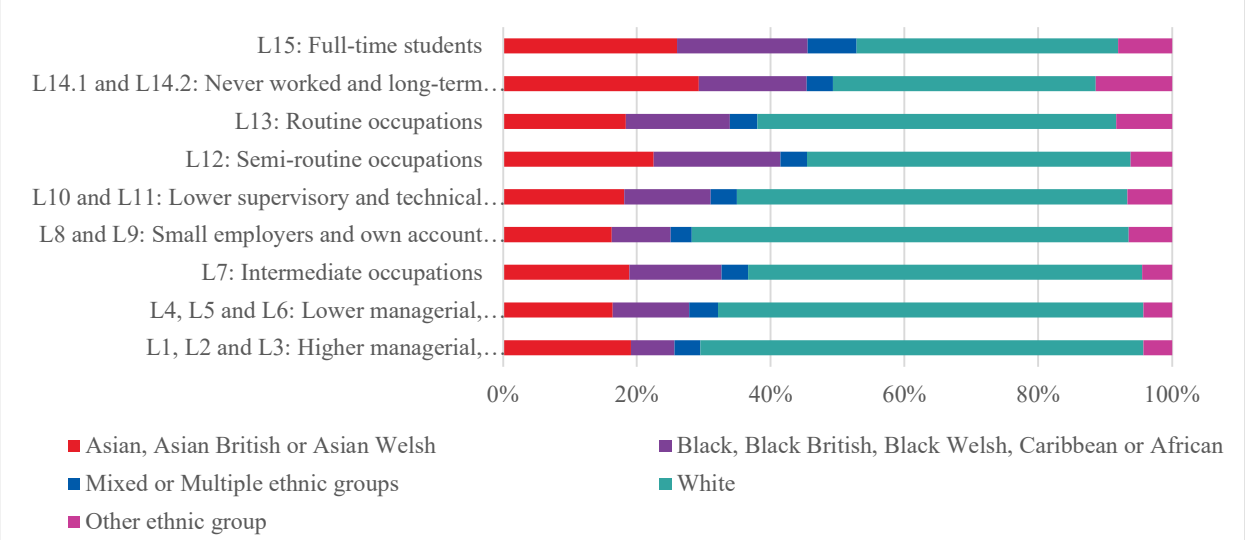
[19] Explore education statistics, 2022. Pupil characteristics - number of pupils by ethnicity and language. Available online at: https://explore-education-statistics.service.gov.uk/data-tables/fast-track/3cf51cad-fddb-4311-bb83-fdc8c551b2e6

Local Authority	Any other ethnic group	Asian	Black	Mixed	White
Islington	981	2,031	2,816	2,645	5,966
Kensington and Chelsea	1,167	1,535	1,035	1,364	2,614
Kingston upon Thames	874	3,437	390	1,777	8,249
Lambeth	1,108	2,156	7,081	3,279	6,611
Lewisham	920	2,585	6,525	4,124	8,693
Merton	536	4,443	1,774	2,208	8,354
Newham	1,849	19,547	5,588	2,714	6,119
Redbridge	432	16,336	2,124	2,530	7,384
Richmond upon Thames	499	2,463	349	2,098	11,289
Southwark	1,726	3,188	7,848	3,116	6,801
Sutton	457	5,370	1,206	2,037	10,196
Tower Hamlets	785	17,111	1,978	2,287	3,677
Waltham Forest	981	6,680	3,454	3,425	10,932
Wandsworth	820	3,938	3,129	2,962	8,463
Westminster	2,183	3,479	1,189	1,167	2,392

3.4.3 Socio-economic classification by ethnic group

The Office for National Statistics (ONS) provides data on National Statistics Socio-economic Classification by Ethnic Group (NS-SeC).[20]. The 2021 Census indicates a higher incidence of those in the 'white' ethnic group occupying higher managerial positions followed by 'Asian/Asian British' and 'black/African/Caribbean/black British'.

Figure 5: Socio-economic Classification by Ethnic Group



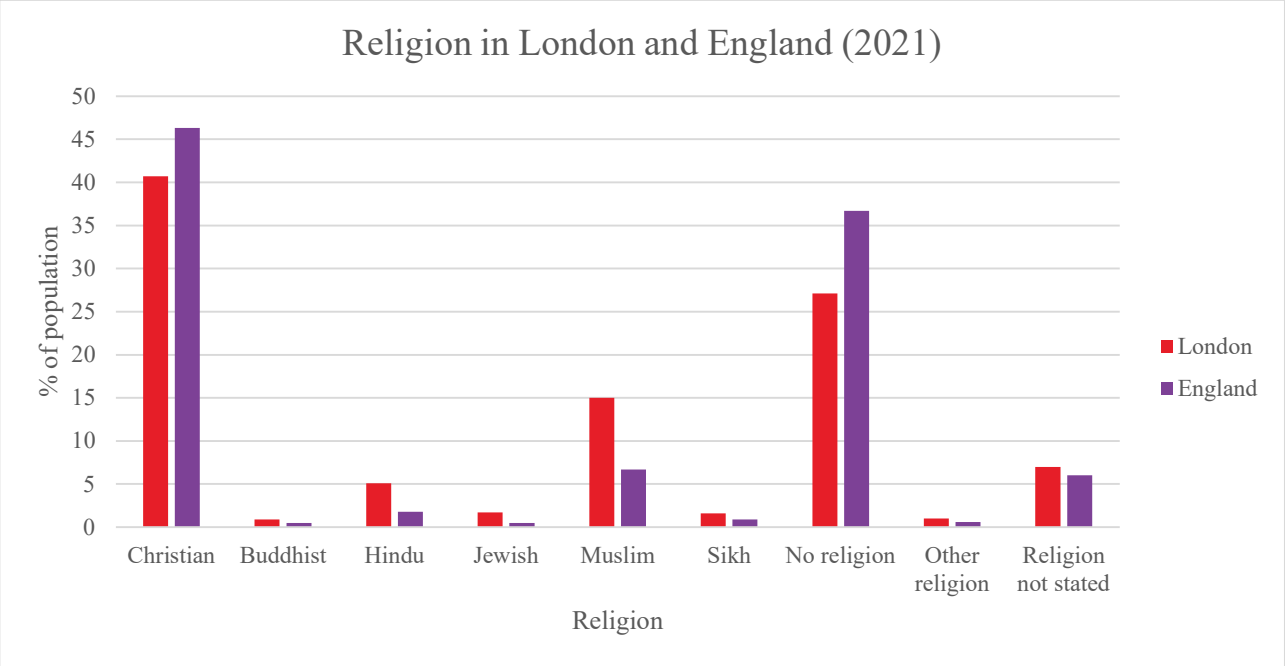
[20] ONS, 2021. NS-SeC by ethnic group by sex by age. Available online at: https://www.ons.gov.uk/datasets/create

3.5 Religion or belief

3.5.1 London's religious/belief profile

In terms of religion Figure 6 indicates that at the time of the 2021 census, the most common religion in London and England is Christian with a slightly lower percentage in London compared to England[21]. In both cases, there are relatively high levels of those who identify as having no religious faith. The percentage of individuals identifying as either Buddhist, Hindu, Jewish, Muslim, Sikh or 'Other' religion in London is relatively high.

Figure 6: Religion or belief in London and England

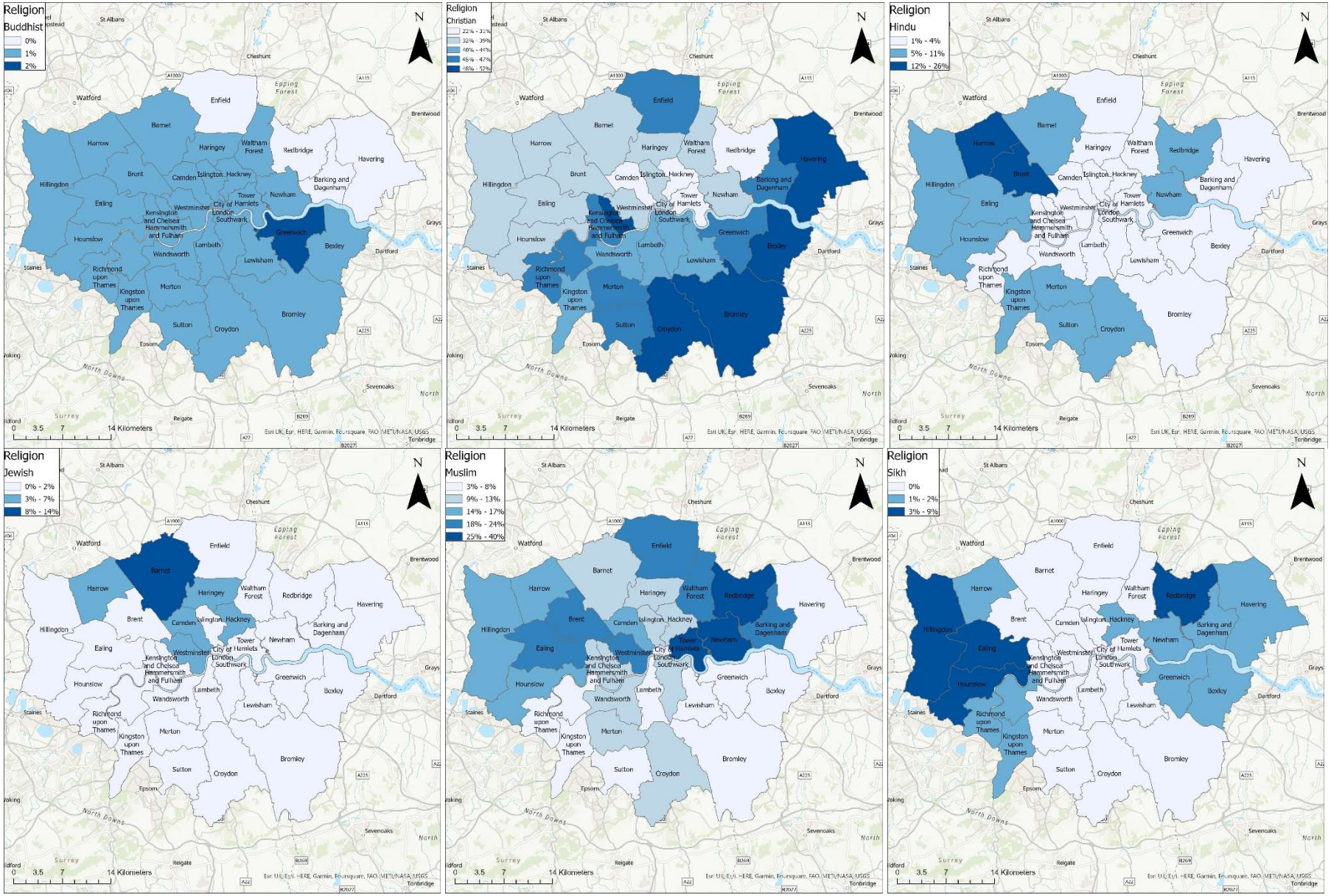


Spatially, there is a relatively large population of Buddhists in Greenwich, a large Hindu community in Harrow, a large Jewish community in Barnet, large Muslim communities in Tower Hamlets, Newham and Redbridge, and large Sikh communities in Ealing, Hillingdon and Hounslow[22]. These patterns are mapped in Figure 7.

[21]ONS, 2021. Religion. Available online at: https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2096

[22]ONS, 2021. Religion. Available online at: https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2096

Figure 7: Percentage of different religions across the London Authorities (2021)



3.5.2 Pupil faith

According to Census 2021 data[23], the majority of pupils aged 7 to 11 years old in London identify as Christian (203,597 pupils (38%)), followed by Muslim (126,017 pupils (23%)), No religion (115,847 pupils (22%)), Religion not stated (36,662 pupils (7%)) and then Hindu (28,856 pupils (5%)).

This does vary greatly by London borough, with Tower Hamlets, Newham and Redbridge all having a majority population that identify as Muslim; and Harrow having almost equal populations that identify as Christian, Hindu and Muslim.

Table 3: The faith of pupils aged between 7 and 11 across London (2021)

Local Authority	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	No religion	Other religions	Religion not stated
London	20,3597 (38%)	2,846 (1%)	28,856 (5%)	10,817 (2%)	126,017 (23%)	9,043 (2%)	115,847 (22%)	3,896 (1%)	36,662 (7%)
Barking and Dagenham	7,223	33	538	8	5,932	366	3,288	39	984
Barnet	8,180	203	1,111	5,190	4,423	90	4,204	250	2,162
Bexley	7,317	106	708	3	980	355	6,014	35	934
Brent	7,209	95	2,641	207	6,966	66	1,652	166	1,283
Bromley	9,077	87	833	31	943	72	8,518	53	1,561
Camden	3,133	39	175	517	2,930	13	2,455	57	875
City of London	77	3	3	1	25	0	52	1	35
Croydon	11,739	85	1,571	14	4,002	92	5,923	115	1,770
Ealing	7,930	196	1,762	48	6,642	1,701	3,302	97	1,483
Enfield	9,997	75	582	126	6,333	86	3,970	737	1,520
Greenwich	8,468	169	779	15	2,512	161	5,416	69	1,123
Hackney	4,605	93	58	2,036	2,962	134	3,378	227	1,672
Hammersmith and Fulham	4,400	43	78	70	1,926	7	1,797	43	725
Haringey	5,669	70	133	1,112	2,643	50	3,791	285	1,308
Harrow	4,642	117	4,435	209	4,125	160	1,224	383	1,007
Havering	7,416	57	432	59	1,433	333	5,744	45	881
Hillingdon	6,484	124	2,445	46	4,654	1,896	3,619	155	1,000
Hounslow	6,661	209	1,817	31	4,776	1,493	2,994	114	1,073
Islington	3,674	30	54	103	2,453	26	2,926	141	729

[23] Census, 2021. Lower tier local authorities, Religion (10 categories) and Age (86 categories). Available online at: https://api.beta.ons.gov.uk/v1/datasets/create/filter-outputs/e439fa30-9d1f-4300-8828-22c34384fd9f

Local Authority	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	No religion	Other religions	Religion not stated
Kensington and Chelsea	3,234	31	58	153	1,123	19	1,231	46	628
Kingston upon Thames	4,291	69	556	22	1,195	99	3,524	34	785
Lambeth	7,473	46	139	32	2,441	19	3,793	59	1,236
Lewisham	8,099	113	485	41	2,194	59	5,581	75	1,447
Merton	6,132	77	950	44	1,881	46	3,183	49	935
Newham	6,800	80	1,217	20	12,008	248	1,836	54	1,308
Redbridge	5,125	87	2,400	198	9,486	1,089	1,957	132	1,163
Richmond upon Thames	6,097	48	336	73	791	131	4,804	62	1,007
Southwark	7,695	83	113	28	2,789	19	4,244	42	1,068
Sutton	5,822	105	1,429	16	1,469	32	4,794	78	883
Tower Hamlets	2,681	62	179	28	12,429	41	1,517	36	847
Waltham Forest	6,040	96	382	49	5,508	72	3,621	124	1,338
Wandsworth	7,359	55	306	77	3,119	53	4,255	52	1,194
Westminster	2,848	60	151	210	2,924	15	1,240	41	698

3.5.3 Faith schools

Across London, there is a total of 1,781 state-funded primary schools (ages 3 to 11 years old, with total number of pupils on roll across these schools being approximately 764,667). Out of these 1,781 schools, 519 have been categorised as religious character schools (1,262 schools have not indicated religious character or have indicated this does not apply to them)[24]. There are a number of schools which are of particular religious character. Some of the categories include:

- Christian (140,383 pupils)
- Greek Orthodox (372 pupils)
- Hindu (1,715 pupils)
- Jewish (7,151 pupils)
- Multi-faith (1,067 pupils)
- Muslim (2,540 pupils)
- Sikh (3,939 pupils).

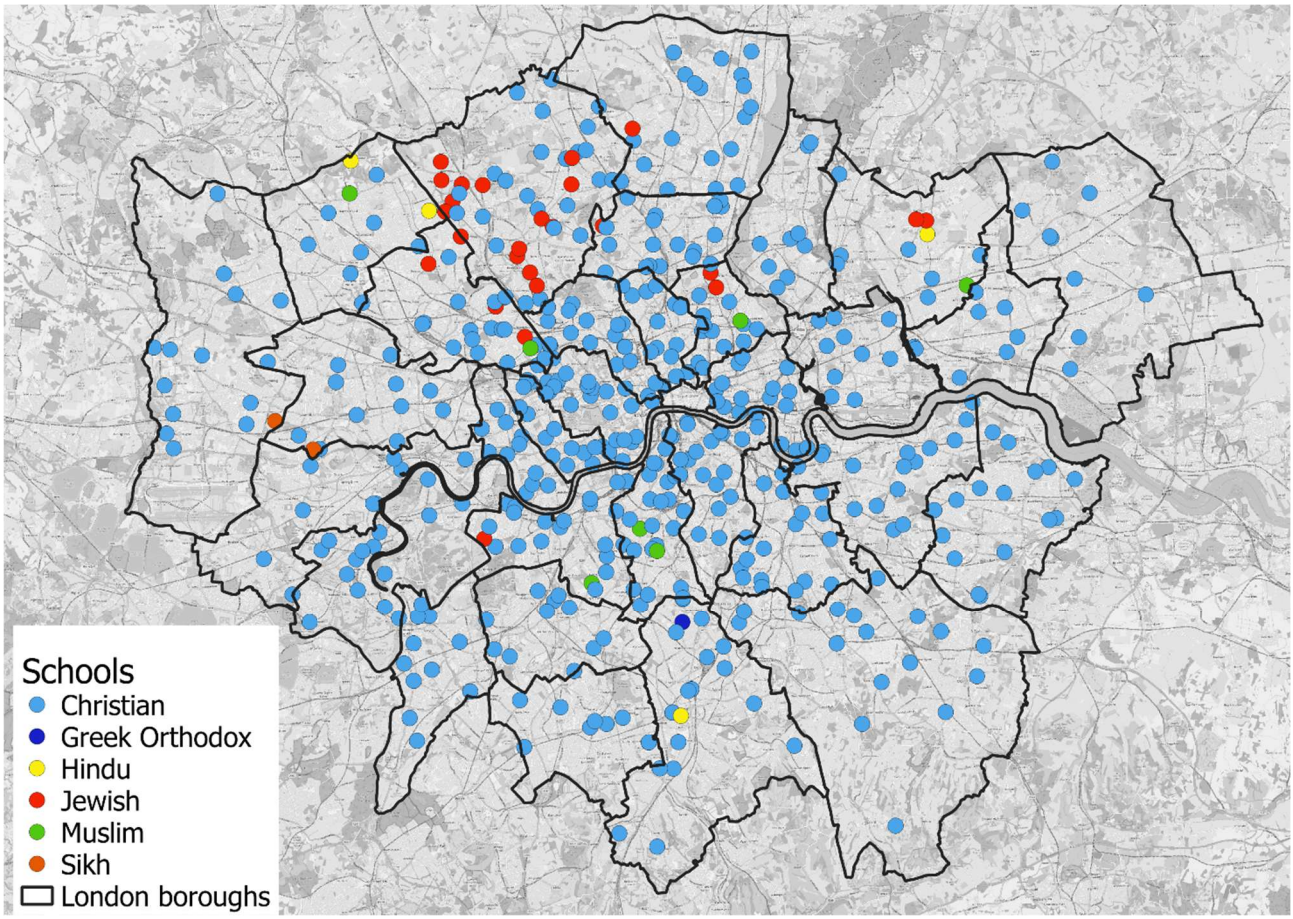
There are 469 Christian schools (including Catholic, Roman Catholic, Church of England and Christian), one Greek Orthodox, four Hindu schools, 25 Jewish Schools, seven Muslim and two Sikh schools across London. The total number of pupils in these schools amounts to 157,167 which is approximately 21% out of all primary school pupils in London.

Spatially, the distribution of schools shown in Figure 8 indicates an even distribution of Church of England, Catholic, Hindu and Muslim state-funded primary schools across London.

Jewish schools are concentrated in the north-west of London, in particular the London Boroughs of Barnet and Brent. Sikh schools are concentrated in the west of London within the London Boroughs of Ealing and Hillingdon.

[24] Department for Education, 2023. Get Information about Schools. Available online at: https://get-information-schools.service.gov.uk/

Figure 8: Spatial distribution of state-funded primary schools in London by their religious character (2023)



3.5.4 Dietary needs by faith

Different religions, and faith groups within them, have specific dietary requirements:

Islam – Muslims are generally forbidden to eat any pork or derivatives. If other meat products are eaten, they should be Halal, i.e., killed in a special manner stated in Islamic law. Generally, fish and eggs are allowed but not if they are cooked near pork or non-Halal food.

Judaism - Orthodox Jews eat only "Kosher" food, i.e., meat that has been prepared in a special way according to Jewish law. Shellfish, pork, rabbit and derivatives are strictly prohibited. Milk and meat products are not eaten in the same meal.

Hinduism - Hindus generally avoid foods they believe hinder spiritual development—for example, garlic and onion and other foods that stimulate the senses. While eating meat is not prohibited, many Hindus avoid it. Eating beef itself is prohibited (cows are sacred), but dairy products from cows are acceptable and considered spiritually pure.

Buddhism - Buddhists' dietary practices are varied. While many Buddhists are vegetarian, it is inaccurate to assume all are. Whether a Buddhist is vegetarian depends on individual choice, the sect to which they belong, or the country they're from.

Sikhism - Although dietary practices vary from person to person, most Sikhs eat meat as long as it is not prepared according to Kosher or Halal methods.

3.6 Socio-economic data

3.6.1 Household composition

13% of households in London are lone parent households. This is slightly higher than the national average of England of 11%[25]. At 19%, Enfield and Barking and Dagenham have the highest proportion of lone parent households in London, whereas the City of London has the lowest proportion (4%) (Figure 9).

Figure 9: Proportion of lone parent households in London

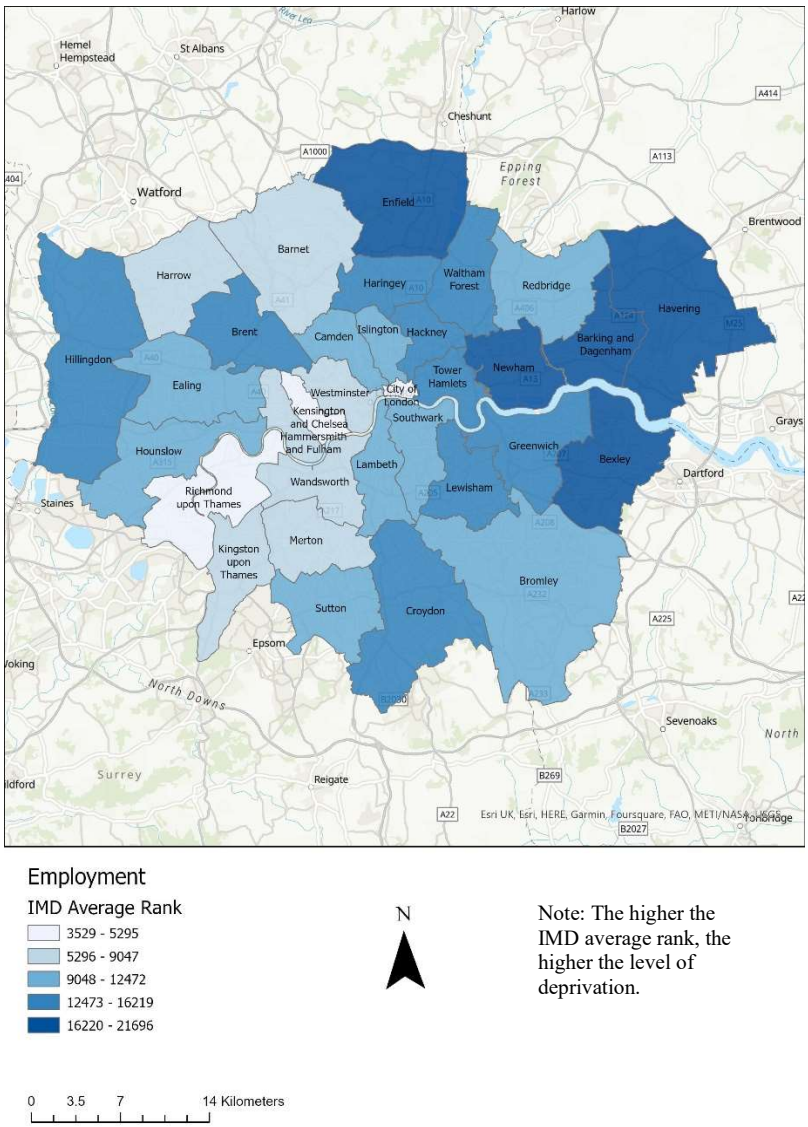
3.6.2 Employment deprivation

The Index of Multiple Deprivation IMD Employment domain measures the numbers of adults involuntarily excluded from the labour market. Employment deprivation across the London boroughs is illustrated in Figure 10. This shows employment deprivation in London is greatest within the eastern-most boroughs, and also in Enfield in the central north[26].

[25] ONS, 2021. Household composition. Available online at: https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2023

[26] MHCLG, 2019. ID – Employment deprivation. Available online at: https://data.london.gov.uk/dataset/indices-of-deprivation

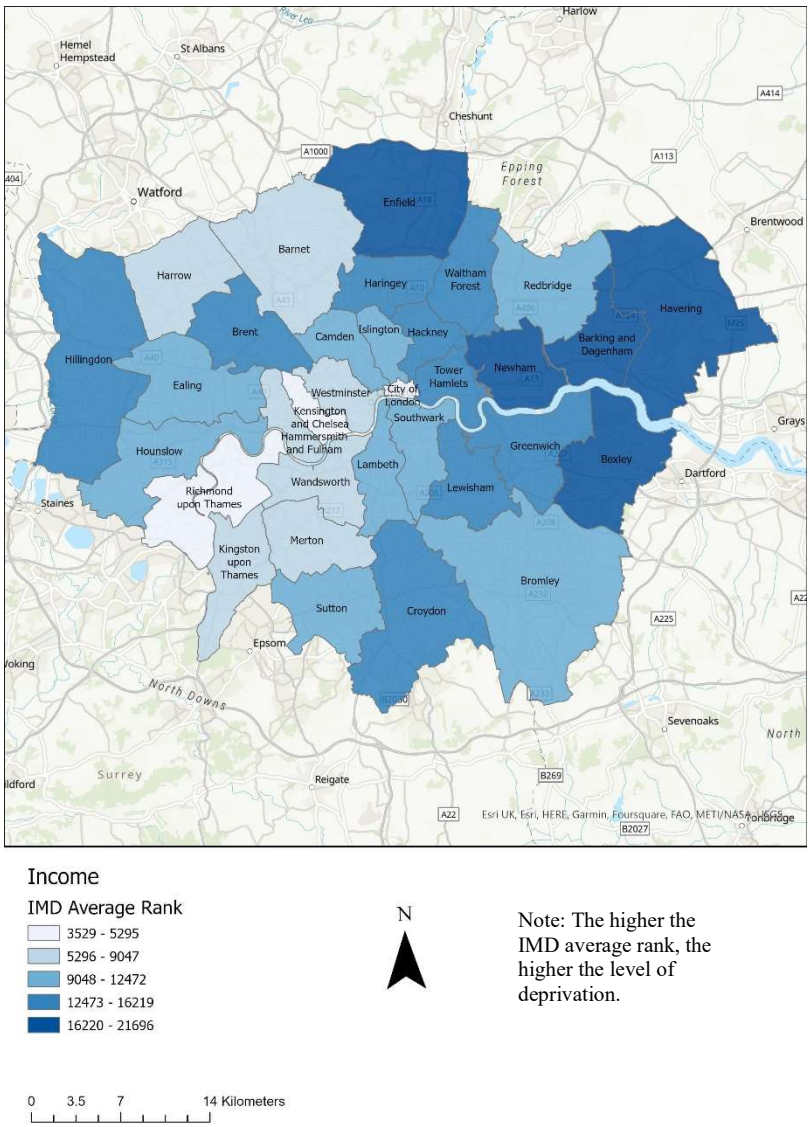
Figure 10: Employment deprivation in London (2019)



3.6.3 Income deprivation

The IMD Income domain measures numbers of people on low incomes who are in receipt of benefits and tax credits. Income deprivation in London is greatest within the eastern-most boroughs, and also in Enfield in the central north[30] (Figure 11).

Figure 11: Income deprivation in London (2019)



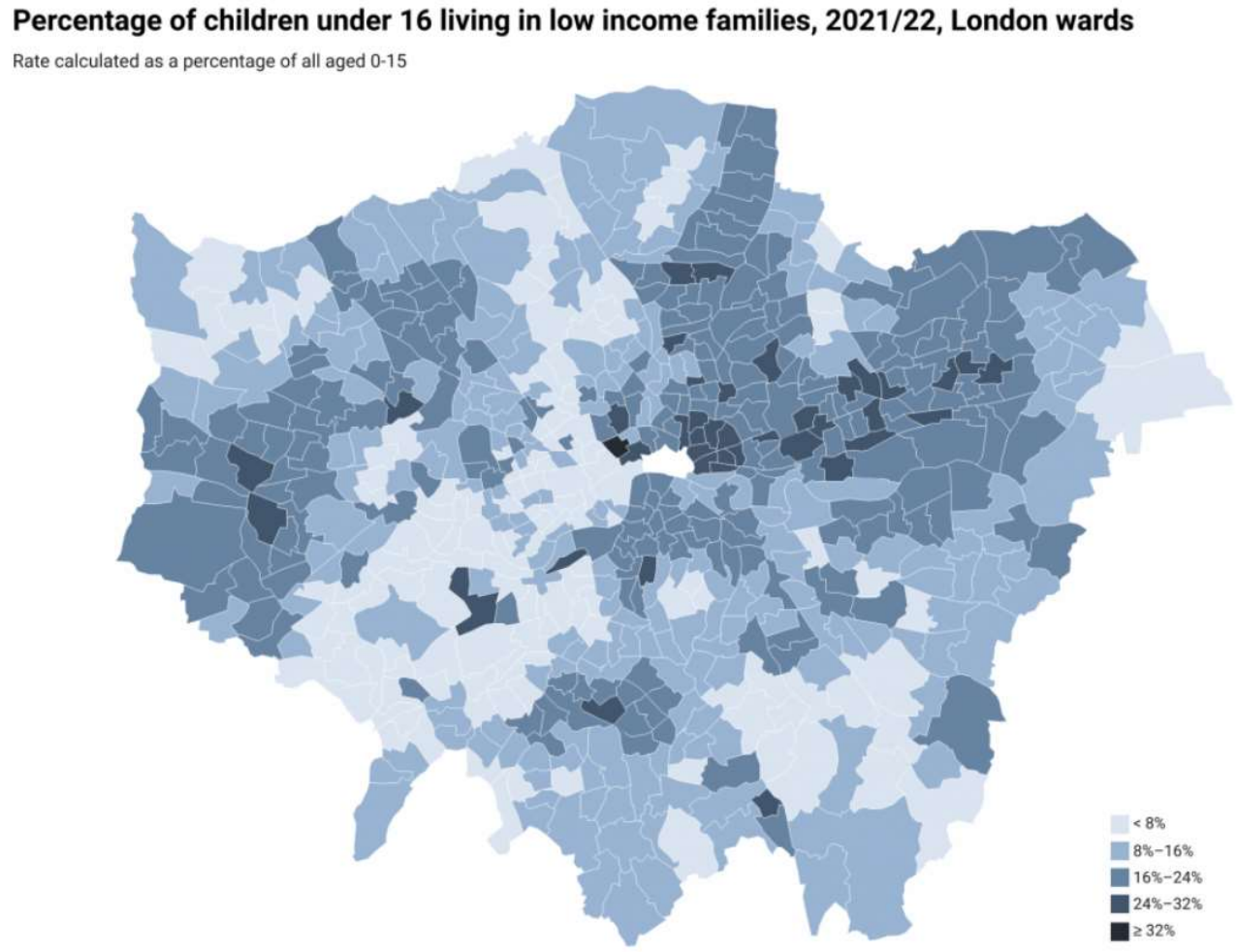
3.6.4 Children living in low-income households.

16% of children in London were reported as living in low-income households in 2021/22. This is 4% lower than the national average of England of 20%. The proportion of London's children living in low-income is relatively high in Barking and Dagenham, Hackney, Newham and Tower Hamlets at 24%[27]. The GLA has mapped this data at a more granular ward level across London[28] (Figure 12).

[27] IG Inform, 2023. Proportion of children aged 0–15 in relative low-income families in England. Available online at: https://lginform.local.gov.uk/reports/lgastandard?mod-metric=15369&mod-period=1&mod-area=E92000001&mod-type=namedComparisonGroup&mod-group=AllRegions_England

[28] GLA, 2023. Poverty in London 2021/22. Available online at: https://data.london.gov.uk/blog/poverty-in-london-2021-22/

Figure 12: Percentage of children in low-income families across London's wards (2021/22)[29]



3.6.5 Number of Londoners living below the poverty line

25% of London's population was reported as living in poverty[30] between 2019/20 and 2021/22. The poverty rate was 29% within Inner London, and 23% across Outer London. This is the lowest London poverty rate that has been recorded in the last 25 years. Despite this apparent improvement, the overall London poverty rate of 25% remains higher than the rest of the UK at 22%[31].

3.6.6 London Living Wage

17% of London employee jobs were paid below the London Living Wage (LLW) in 2021[32]. This was the lowest percentage that has been recorded since 2012.

The proportion of employees earning less than the LLW varies considerably across the boroughs. As of 2018, it was more than 40% in Redbridge, Sutton and Enfield, and between 30% and 40% in Barnet, Bexley, Brent, Bromley, Ealing, Harrow, Havering, Merton, Newham and Waltham Forest. It was however less than 10% in the City of London, and between 10% and 15% in Camden, Hammersmith and Fulham, Islington, Southwark, Tower Hamlets and Westminster[33].

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[29] GLA, 2023. Poverty in London 2021/22. Available online at: https://data.london.gov.uk/blog/poverty-in-london-2021-22/

[30] Percentage of people of working age in households with income below 60% of national median.

[31] London Datastore, 2023. Poverty in London 2021/2022. Available online at: https://data.london.gov.uk/blog/poverty-in-london-2021-22/#:~:text=The%20estimated%20number%20of%20Londoners,%2F18-2019%2F20.

[32] London Datastore, 2021. London Living Wage. Available online at: https://data.london.gov.uk/economic-fairness/labour-market/london-living-wage-llw/#:~:text=Around%20one%20in%20six%20employee,London%20Living%20Wage%20in%202021.

[33] ONS, 2018. Employees earning below the London Living Wage. Available online at: https://data.london.gov.uk/dataset/earning-below-llw

3.6.7 Benefit cap

According to Works and Pensions data, 202,336 households in London had their 'benefits capped to November 2022'. This represents approximately one third of all GB households with benefits capped. Most of these London households were located in Enfield and Brent, followed by Ealing, Barnet and Newham. Households in the City of London and also Kensington and Chelsea, Bexley, Bromley, Havering, Kingston upon Thames, Merton, Richmond upon Thames and Sutton[34] had limited benefits capping.

3.6.8 Cost of living

According to the Cost-of-Living Tracker [35], London households with the lowest incomes are predicted to have a 24% increase in the cost of goods and services compared to the three years leading up to March 2020.

Outputs from the GLA cost of living poll[36] between January 2022 and April 2023 indicate that over this time, the numbers stating that they are 'financially struggling' has increased from around 12% to 22%.

3.6.9 Food security

The Survey of Londoners published data on food security in London[37]. As of 2021-22, 14% of parents or guardians in London have children living in low or very low food security (this includes any children aged under 16 living in the household). Households with more children are more likely to experience food insecurity among children. Also, children of low income or disabled parents are more likely to experience food insecurity. Parents living in the London Assembly constituency area of City & East are most likely to have children living in low food security (32%).

3.6.10 Carers and employment

According to the Department for Work and Pensions (DWP) Family Resources survey 2021/22[38], 50% of informal carers aged 16 and above were in employment compared with 59% of everyone aged 16 and above. The Joseph Rowntree Foundation's 2023 Poverty Report[39] estimated 29% of carers in the UK were living in relative poverty in 2021/22.

3.7 School demand and attendance

3.7.1 School places

The demand for state-funded primary school places in London is expected to decrease by 0.4 over the next five years. The demand for state-funded secondary school places in London is however expected to increase by 1.5%[40]. It should be noted that this pattern varies across the London geography.

3.7.2 Schools absence and attendance rates

According to 2022 data[41], attendance rates across the London Authorities ranged between 93% and 95%. The boroughs where the highest proportions of absence have been recorded for the school year-to-date include

[34] Department for Work and Pensions, 2023. Benefit cap: number of households capped to November 2022. Available online at: https://www.gov.uk/government/statistics/benefit-cap-number-of-households-capped-to-november-2022

[35] Trust for London, 2023. London's Cost of Living Tracker. Available online at: https://trustforlondon.org.uk/data/topics/cost-of-living-tracker/

[36] GLA London Datastore. GLA cost of living polling 2022. [Accessed 17/06/23] https://data.london.gov.uk/dataset/gla-poll-results-cost-of-living-2022

[37] London Datastore (2021-2022) Food security in London: Headline findings from The Survey of Londoners 2021-22. Available online at: https://data.london.gov.uk/dataset/survey-of-londoners-2021-22

[38] DWP, 2022, Family Resources Survey 2021/22, Care Data tables, Table 5.4. As referenced in House of Commons Library, Research Briefing, Informal Carers. [Accessed 17/06/23] https://researchbriefings.files.parliament.uk/documents/CBP-7756/CBP-7756.pdf

[39] Joseph Rowntree Foundation, 2023. UK Poverty 2023. The essential guide to understanding poverty in the UK.

[40] GLA, 2018. Projected Demand for School Places. Available online at: https://data.london.gov.uk/dataset/pan-london-school-place-demand

[41] Explore education statistics service, 2022. Pupil absence in schools in England. Available online at: https://explore-education-statistics.service.gov.uk/find-statistics/pupil-absence-in-schools-in-england

Newham and Tower Hamlets (7%), whereas lowest absence rates have been recorded in Richmond upon Thames, Bromley and Kingston upon Thames (5%).

3.8 Free school meals

3.8.1 Free school meals eligibility

According to 2022 data, the proportion of school pupils known to be eligible for FSM in London is 25%[42] compared to the English average of 23%. The proportion of London pupils eligible for FSM is highest in Islington (41%), followed by Camden (39%), Hackney (39%) and Tower Hamlets (38%). London boroughs with the lowest proportion of pupils eligible for FSM include Richmond upon Thames (12%), Kingston upon Thames (13%) and Bromley (15%).

3.8.2 Free school meals uptake

80% of eligible pupils in London take free school meals, compared to 76% across England[43]. The percentage of eligible pupils in London taking their free school meals is considerably low in the City of London, at just 32%. The highest percentage of eligible pupils who take free school meals is in Southwark, at 89%.

3.8.3 Free school meals and ethnicity

According to 2023 data, the majority of pupils that are eligible for FSM in state-funded primary schools in London are 'white', with 56,085 pupils falling into this category. This majority is followed by pupils identifying as 'black' (44,585), 'Asian' (29,875), 'mixed' (26,251), and then 'any other ethnic group' (14,364)[44]. This pattern is illustrated in

Figure 13.

Whilst the majority of pupils eligible for FSM identify as 'white', the ethnicity with the highest proportion of FSM-eligible pupils is those identifying as 'black'. Specifically, 40% of pupils who identify as 'black' are eligible for FSM in London, followed by pupils identifying as 'any other ethnic group' (33%), 'mixed' (31%), 'white' (19%) and lastly, 'Asian' (18%).

[42] Explore education statistics service, 2022. FSM – Percentage of pupils for 'Pupil characteristics – Free School Meals'. Available online at: https://explore-education-statistics.service.gov.uk/data-tables/fast-track/c2564d14-19f4-4d3f-bab2-6f2c568e55d2

[43] Explore education statistics service, 2022. FSM – Percentage of pupils for 'Pupil characteristics – Free School Meals'. Available online at: https://explore-education-statistics.service.gov.uk/data-tables/fast-track/c2564d14-19f4-4d3f-bab2-6f2c568e55d2

[44] Department for Education, 2023. 'Pupil characteristics - FSM eligible pupils by ethnicity or national curriculum year group' from 'Schools, pupils and their characteristics'. Available online at: https://explore-education-statistics.service.gov.uk/data-tables/permalink/c0319f82-e1e3-4adf-9db1-08db63516a24

Figure 13: Free School Meal eligibility by ethnicity in London

Note that the percentages shown in the red bars represent the proportion of pupils that are eligible for FSM out of all pupils identifying as the same ethnicity. For example, 19% of pupils identifying as 'white' are eligible for FSM.

3.8.4 Free school meals and educational attainment

Based on national results from 2022, pupils eligible for FSMs have lower GCSE attainment than non-eligible pupils[32]. This is based on achieving a "standard pass" in English and maths GCSE. For example, in 2021, 51% of pupils eligible for FSMs in England achieved a standard pass in both subjects, compared to 77% of non-eligible pupils. The same study reported that pupils receiving FSM in London have the highest GCSE attainment of all pupils known to be eligible for FSMs across England. Overall, pupils eligible for FSM typically achieve lower GCSE attainment across England although this relationship is less pronounced in London.

4. Existing engagement

Greater London Authority (GLA) officers have conducted extensive engagement and consultation with London boroughs and schools on the UFSM scheme since the announcement of the scheme, in order to understand barriers to take-up and explore practical interventions to mitigate these. Engagement and consultation have primarily taken place through webinars, surveys, steering bodies and advisory groups but have also been conducted through 1:1 conversation with boroughs and school leaders. Webinar sessions to date have focused on key operational issues for schools including pupil premium, procurement, infrastructure/kitchens, and the GLA have been working with those boroughs already delivering UFSM so that we can learn from their roll-out. The GLA has established several steering bodies and advisory groups in order to ensure a user-centred approach to strategy and operational delivery – ensuring that boroughs, schools and GLA have an opportunity to jointly identify and discuss issues in the scheme's lead-up and roll-out alike. These groups include the Partnership Advisory Group (PAG); Task & Finish groups (Evaluation and Monitoring, Schools, Grant Management, and Sustainability); and a UFSM Delivery Group. The GLA has also conducted further engagement directly with schools including a practicalities survey shared with boroughs to understand the landscape across London for delivery, including the resources or materials that would best support them in the roll-out of this scheme.

Information gathered during this engagement and consultation has helped to inform both policy development and assumptions around indicative price points for meals for different faith groups.

Key findings from GLA engagement included:

- At a borough level, most boroughs reported no additional costs for halal meals. Some boroughs reported halal meat can be more expensive but is readily available in the school food supply chain. Schools often choose to be pork free and/or cook with halal meat only, to meet the needs of their whole school community with the same menu. Boroughs with both high populations and relatively low populations of Muslim children were engaged with.
- In areas with high proportions of Muslim pupils, caterers reported that due to a high demand for halal meat, they have negotiated lower costs (due to economies of scale) with suppliers. This means there is currently no difference in price between halal or haram (forbidden) meat.
- For boroughs with a high number of Jewish children, kosher meals often incur an additional cost. The cost difference for this type of meal was reported at £3.27 (62 pence more than the Mayor's £2.65). For other boroughs, kosher meals are considered a 'special meal' and are less common.
- Some boroughs reported an additional cost associated with meals for children with severe SEND. This related to pupil numbers often being much lower than in mainstream settings. The unit cost of providing these particular meals is variable but tends to be higher.
- In some cases, SEND schools offer the same meals as mainstream primary schools meaning there is no cost difference for the meal but there is considerable extra cost for staff in special schools.
- Some caterers reported that special provision is not currently made for kosher, and in some schools, specific dietary requirements.

Ongoing stakeholder engagement will be carried out, in June 2023, as part a wider Integrated Impact Assessment for the proposed UFSM policy. Outcomes and insights from this will be included in an update to this EqIA.

5. Assessment

A qualitative assessment has been undertaken of potential disproportionate and differential effects, both positive and negative, that could arise from the implementation of the proposed UFSM policy for London, for the protected characteristic groups as identified by the Equality Act. The assessment also draws on our understanding of the potential issues and sensitivities identified through our policy review and baseline profiling work. The assessment makes recommendations for how any potential adverse equality effects may be mitigated and any potentially positive equality effects enhanced.

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
Age *People of all ages*	London has a slightly larger population of children aged 0-4 than the England average (by 1%). There is evidence of an association between good diet quality and positive mental health and wellbeing in children (O'Neil et al., 2014[45]; Khalid et al., 2016[46]). The importance of a good diet to achieving good health outcomes throughout life is well understood, and its contribution to children's physiological development is critical (UNICEF, 2019[47]). Households with more children are more likely to experience food	None identified	**Positives/strengths** Positive impacts on young people aged 7-11 who will now benefit from free school meals and the benefits for nutrition, mental health and wellbeing, and academic learning and attainment that this will bring. This will bring the greatest benefits for those children from poorer households who may currently being missing out. There are potential benefits for other children living in households with children who would qualify for UFSM. They may benefit from increased money being available to spend on food for other children within the household, including pre-schoolers and older siblings. Also, potential benefits for parents who may often prioritise food provision for their children, rather than themselves. This could have benefits for overall health	

[45] O'neil, A., Quirk, S. E., Housden, S., Brennan, S. L., Williams, L. J., Pasco, J. A., & Jacka, F. N. (2014). Relationship between diet and mental health in children and adolescents: a systematic review. American Journal of Public Health, 104(10), e31-e42. DOI: 10.2105/AJPH.2014.302110

[46] Khalid, S., Williams, C., & Reynolds, S. (2016). Is there an association between diet and depression in children and adolescents? A systematic review. British Journal of Nutrition, 116(12), 2097-2108. doi:10.1017/S0007114516004359

[47] UNICEF (2019). The State of the World's Children 2019. Children, Food and Nutrition: Growing well in a changing world. UNICEF, New York.

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	insecurity among children (see 3.6.9).		and wellbeing and potentially reduce diet related ill health. Benefits for households with a greater number of children. Current eligibility threshold for FSM does not take account of number of children in a household. If they do not fall within the threshold, then financially they have to pay for school meals for all children. This means that household finances have to stretch to the provision of a greater quantity of meals and the quality and quantity of these are likely to be more greatly impacted. For London boroughs who currently already provide UFSM to all primary school children, the funding will potentially then be used to provide UFSM to secondary school pupils or enhanced holiday meal provision which will bring benefits to a wider range of children or varying age groups.	
Disability *A person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out*	Across London there are 156 state-funded Special educational needs and disabilities (SEND) schools. Spatially, SEND schools are evenly distributed across all London Boroughs. In London, the total number of SEND pupils in Year 3 were 1,172 in 2021/22, slightly higher in Year 4 at 1,176 and Year 5 at 1,260 and	The current proportion of SEND children in need of a special meal or requiring assistance with eating, and the potential implications for cost, is unknown.	**Positives/strengths** Free school meals will be available to more children in years 3-6, in state-funded schools, a proportion of which will be SEND children. This will benefit families who are more likely to be experiencing the financial constraints of the cost-of-living crisis but who do not currently qualify for FSM.	

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
normal day-to-day activities. The definition includes: sensory impairments, impairments with fluctuating or recurring effects, progressive, organ specific, developmental, learning difficulties, mental health conditions and mental illnesses, produced by injury to the body or brain. Persons with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled	the highest number recorded was for Year 6 at 1,357. Pupils with special education needs are more likely to be eligible for government free school meals. Approximately 37% of pupils in London with special education needs were eligible for free school meals in January 2022 compared to about 20% of pupils without special education needs[48]. DfE statistics show a clear link between SEND and children living in poverty (see 3.3.4). Approximately 63% of all SEND children in state-funded schools in London, are not eligible for the government's UFSM. Children of disabled parents are more likely to experience food insecurity (see 3.6.9). There are strong links between conditions such as Attention Hyperactivity Disorder (ADHD)	Ongoing investigation around the pricing of meals for different SEND needs would be useful for informing the whether the proposed price per meal of £2.65, is adequate to cover provision.	**Further considerations** The price point of £2.65 per child, may not be enough to cover whole meal costs for some children in SEND schools. Feedback from engagement has indicated that average meal costs for a child in a SEND school are generally higher than this price point, by around £2-3. Although not all SEND children will have specific dietary requirements, there is often a need for foods to be able to be pureed and economies of scale are tight given the relatively smaller pupil numbers within these schools. Making up any shortfall in funding for meals for all pupils taking up UFSM may have financial implications for SEND schools and their pupils. However, these schools do receive additional funding overall, with an expected percentage of that anticipated to go towards food provision. In addition, children with an EHCP who need assistance with eating and special diets should have this covered within the health part of their EHCP. It should therefore be funded at child level as well. For those SEND children in main-stream schools, they are more likely to have specific dietary needs, whether related to food allergies, intolerances or phobias that are not necessarily catered for and therefore may potentially be less likely to engage with school meals. They may therefore still need to bring their own packed lunches to	Consideration of whether a separate meal price point needs to be agreed for SEND schools in London. Consideration of contingency funding for any extraordinary costs that are a barrier to children accessing the scheme.

[48] Department for Education (DfE) (2022). Special educational needs and disability: an analysis and summary of data sources, [Accessed 11/06/23] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1082518/Special_educational_needs_publication_June_2022.pdf

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
persons from the point of diagnosis.	and Autism and avoidant restrictive food intake disorder (ARFID)[49]		school, and their families would not benefit from the financial relief of UFSM.	
Gender reassignment *In the Act a trans(gender) person is someone who proposes to, starts or has completed a process to change his or her gender. This may also apply to trans children. A person does not need to be under medical supervision to be protected.*	Research conducted by YouGov in 2019 revealed that, on average, LGBTQ+ employees earn 16% less than heterosexual workers[50]. This gap equates to approximately £6,700 per year before tax. These findings demonstrate that the wage gap between heterosexual and LGBTQ+ professionals is nearly twice that of the UK's gender pay gap between men and women. This pay gap, among other factors, may result in the LGBTQ+ community being more strongly affected by the cost-of-living crisis.	N/A	**Positives/strengths** LGBTQ+ parents or guardians, who are more likely to be economically constrained compared to heterosexual parents or guardians, may benefit from the financial relief provided by this proposed policy.	

[49] Avon and Wiltshire Mental Health Partnership [Accessed 28/06/23] https://www.awp.nhs.uk/camhs/conditions/eating-issues/avoidant-restrictive-food-intake-disorder-arfid

[50] Sphere, 2019. Heterosexual and LGBTQ+ pay gap higher than UKs gender pay gap. Available online at: https://www.spheredigitalrecruitment.com/blog/wage-gap-between-heterosexual-and-lgbtq-plus-significantly-higher-than-uks-gender-pay-gap/

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
Pregnancy and maternity *Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.*			No impacts identified.	
Race/ethnicity *This includes ethnic or national origins, colour or nationality, and includes refugees and migrants, and Gypsies and Travellers. Refugees and migrants means people whose intention is to stay in the UK for at least twelve months (excluding visitors, short term students or*	London is more ethnically diverse than England with a greater percentage of the population identify as something other than 'white' than the English average, at around 46% compared with 19% respectively. 2019 data from the DfE on the ethnic composition of pupils indicates that the majority of primary school pupils in London identify as 'white' (281,277 pupils). However, there are sizeable numbers that identify as 'Asian' (210,763), 'black' (111,028), 'mixed' (85,546) and then 'any other ethnic group' (43,502). Whilst the majority of pupils eligible for FSM identify as 'white', the ethnicity with the	Data is currently lacking on uptake of UFSM, by ethnic group, in those London Boroughs that have already implemented the policy.	**Positives/strengths** Potential to reduce the stigma around receipt of FSM. The data indicates that pupils from 'black' or 'mixed' ethnic groups are, as a grouping, proportionally more likely to be eligible for FSM. Current uptake, in London, for those eligible, is around 80% (see **Error! Reference source not found.**), which means that around 20% of those eligible are not taking up their free school meal. All children who meet the current eligibility criteria for FSM will now receive their free school meal. The current process means that parents have to formally apply to their local authority, or via their child's academy school, to claim for free school meals. Those from ethnic groups for whom English is not their first language may find it more difficult to navigate the system and/or complete the necessary forms. UFSM will remove this barrier. Historically families who were undocumented, due to their immigration status, and/or with no recourse to public funds (NRPF) (i.e., no entitlement to the majority	Monitoring of uptake of UFSM, by ethnic group, during the pilot, would provide useful information for any future policy intervention of this nature.

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
tourists). This definition includes asylum seekers; voluntary and involuntary migrants; people who are undocumented; and the children of migrants, even if they were born in the UK.	highest proportion of FSM-eligible pupils is those identifying as 'black'. Specifically, 40% of pupils who identify as black are eligible for FSM in London, followed by pupils identifying as 'any other ethnic group' (33%), 'mixed' (31%), 'white' (19%) and lastly, 'Asian' (18%). There is a higher percentage of people from ethnic groups other than 'white' in lower grade jobs which would generally be less well paid (see 3.4.3).		of welfare benefits including income support, housing benefits and a range of allowances and tax credits) were not entitled to FSM under the eligibility criteria. Although, a scheme to make FSM available to these families was introduced during Covid and permanently extended to all households with no recourse to public funds (NRPF) in January 2023[51], this still requires the completion of an application form. UFSM would ensure that those families who are generally amongst the poorest households, but also generally higher levels of ethnic minority groups would automatically benefit from a free school meal. One of the conditions of the Grant is that schools must ensure that '*food is culturally appropriate'*. Food should meet the cultural needs of students in their area. This should ensure that UFSM benefits all ethnic groups and communities, including those from ethnic minority groups. Anecdotal evidence suggests that many schools, particularly in ethnically diverse areas of London, already cater well for cultural/faith dietary needs including, for example, the use of Halal meats in those communities with a high percentage of Muslim students.	
			Further considerations There is often a strong link between ethnicity and faith. This intersectionality means that current school meals may not necessarily meet the cultural/faith dietary needs of all communities, and therefore uptake may be lower	

[51] DfE, 2023. Guidance: Providing free school meals to families with no recourse to public funds (NRPF)

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
			amongst these groups (see section below on 'religion or belief').	
Religion or belief *Religion includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief.* ***See also GLA supplementary paper to this EqIA***	The percentage of individuals identifying as either Buddhist, Hindu, Jewish, Muslim, Sikh or 'Other' religion in London is relatively high compared with the England average (see 3.5.1). Across London, the majority of pupils aged 7 to 11 years old in London identify as Christian (38%), followed by Muslim (23%), No religion (22%), Religion not stated (7%) and then Hindu (5%). There are 469 Christian schools (including Catholic, Roman Catholic, Church of England and Christian), one Greek Orthodox, four Hindu schools, 25 Jewish Schools, seven Muslim and two Sikh schools across London. The total number of pupils in these schools amounts to 157,167 which is approximately 21% out of all primary school pupils in London. There is a high concentration of Jewish schools in the North-west of London, in particular London	Data is lacking on primary school pupil numbers by faith, outside of faith-based state-funded schools. Data is currently lacking on uptake of UFSM, by faith group, in those London Boroughs that have already implemented the policy. It is worth noting that not all students may follow their faiths dietary customs and therefore demand may be	**Positives/strengths** The UFSM will be made available to all state-funded primary schools, pupil referral units and special schools, including maintained schools, academies, and free schools. This includes all faith schools and multi-faith schools that fall within these categories. Anecdotal evidence from early engagement with a sample group (see Section 4) indicates that for most boroughs there are not any additional costs for providing Halal meals. However, this may vary from school to school and with the number of students of Muslim faith within a school (potential economies of scale). Evidence suggests a mixed approach to meal provision for those of Muslim Faith e.g., most schools offer a vegetarian option and/or ensure all meat is Halal in order to meet the needs of their whole school community. While Halal meat can be more expensive, one borough noted that it is readily available in the school food supply chain. With most schools providing at least one vegetarian option on the menu each day, it is anticipated that the dietary needs of the majority of children from Muslim, Buddhist and Hindu faiths would be catered for each day. The requirement from school food standards to ensure that a portion of non-dairy protein is provided on three or more days each week should enable the needs of	Monitoring of uptake of UFSM, by faith group, during the pilot, would provide useful information for any future policy intervention of this nature.

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	Boroughs of Barnet and Brent. Catholic, Christian, Hindu and Muslim schools are dispersed across London, however Sikh schools are concentrated in the West of London within the London Boroughs of Ealing and Hillingdon (see 3.5.2). Different religious/faith groups have specific dietary requirements (see section 3.5.4 for further details). School food standards[52] state that '*for vegetarians, a portion of non-dairy protein on 3 or more days each week'* should be provided. A 2020 landmark legal case ruled that Ethical Veganism is a philosophical belief under the Equality Act.	lower than anticipated. No robust dataset exists on the cost of meals that cater to those with religious requirements, although some consultation with boroughs has taken place to mitigate this gap. Ongoing consultation and engagement will seek to verify assumptions around price point.	Vegans to be met on most days and enable them to benefit from the financial benefits of UFSM.	
			Further considerations School meal provision across mixed faith schools may not necessarily meet the dietary requirements of pupils from faith groups such as the requirement for Kosher meals for Jewish children, Halal meals for Muslim children, the need for some of those of Hindu faith to avoid foods such as garlic and onion and other foods that stimulate the senses, or the need for good quality vegetarian meals for those from Hindu or Buddhist faiths. This may be more of an issue in schools where there are lower numbers of children from minority faith groups where the default may not be to cater for their specific dietary needs. This may affect uptake of UFSM by children from these faiths who may continue to bring packed lunches to meet their dietary requirements and therefore not feel the financial benefits of UFSM. Anecdotal evidence from early engagement with a sample group suggests that the price point for UFSM of £2.65, may not be enough to cover whole meal costs for children. For example, anecdotal evidence suggests that Jewish Kosher meals in state-funded Jewish schools may generally come in higher than the price point, by around £2-£3. This is generally related to the slightly higher price of Kosher food and particularly Kosher meat. This price differential could lead to the need for	Put aside contingency funding for any extraordinary costs that are a barrier to children accessing the scheme. To model and provide analysis of additional funding that would be required to meet the needs of faith communities who fall outside of the government's eligibility criteria. To monitor during the pilot, the number of children, from different faith

[52] DfE (2023) Guidance – School Food Standards Practical Guide [Accessed 12/06/23] School food standards practical guide - GOV.UK (www.gov.uk)

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
			either subsidisation by the schools or families; diversion of funding from other areas of the school; or a move to cold meals for all children, with a lower price point but also a potentially lower nutritional value. Making up any shortfall in funding for meals for all pupils taking up UFSM may have financial implications for faith schools and their pupils. School meal provision may not necessarily meet the dietary needs of pupils who follow a vegan diet on all days of the week. This may affect uptake of UFSM by children who follow a vegan diet, who may continue to bring packed lunches to meet their dietary requirements and therefore not feel the financial benefits of UFSM.	groups, taking up UFSM. To look at options around external provision of Kosher meals that would be pre-ordered to prevent waste and cross contamination. Increase the number of vegetarian and fish options to suit a greater range of cultural/faith needs. Ensure that all schools provide at least one vegetarian option each day to cater for faith groups dietary requirements.
Sex *Both men and women are covered under the Act.*	Within London 13% of households are lone-parent households, which is slightly higher than the national average. Lone parents have the highest poverty rate among working-age adults, with 50% living in poverty in London, and 42% in England	Data is not currently available on uptake of FSM by lone-parent households.	**Positives/strengths** The proposed policy is likely to bring financial, and health benefits to children from lone-parent, and thus lone-income, households that are statistically more likely to be headed by women.	

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	between 2019 and 2020[53]. The majority of the 2.9 million lone-parent families in 2022 in the UK were headed by a lone mother (2.5 million, 84%)[54].			
Sexual orientation *The Act protects lesbian, gay, bisexual, and, heterosexual people*	Research conducted by YouGov in 2019 revealed that, on average, lesbian, gay, bisexual, transgender, queer and others. (LGBTQ+) employees earn 16% less than heterosexual workers[55]. This gap equates to approximately £6,700 per year before tax. These findings demonstrate that the wage gap between heterosexual and LGBTQ+ professionals is nearly twice that of the UK's gender pay gap between men and women. This pay gap, among other factors, may result in many members of the LGBTQ+ community more strongly feeling the effects of the cost of living crisis.	N/A	**Positives/strengths** LGBTQ+ parents or guardians, who are more likely to be economically constrained compared to heterosexual parents or guardians, may benefit from the financial relief provided by this proposed policy.	

[53] Trust for London, 2013. Working-age adults. Available online at: https://trustforlondon.org.uk/data/populations/working-age-adults/?tab=family-type-poverty

[54] Families and households in the UK - Office for National Statistics (ons.gov.uk)

[55] Sphere, 2019. Heterosexual and LGBTQ+ pay gap higher than UKs gender pay gap. Available online at: https://www.spheredigitalrecruitment.com/blog/wage-gap-between-heterosexual-and-lgbtq-plus-significantly-higher-than-uks-gender-pay-gap/

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
Marriage and civil partnership *Only in relation to due regard to the need to eliminate discrimination.*	N/A	N/A	This characteristic is not applicable as under the Act, marriage and civil partnership is considered a protected characteristic only in relation to discrimination in the workplace and is therefore outside the scope of this assessment.	
Socio-economic status *I.e., consideration of those on low incomes, and those living in deprived areas.*	16% of children in London were reported as living in low-income households in 2021/22. 25% of London's population was reported as 'living in poverty' between 2019/20 and 2021/22. the overall London poverty rate remains higher than the rest of the UK at 22%. 17% of London employee jobs were paid below the London Living Wage (LLW) in 2021		**Positives/strengths** There is the potential to reduce the stigma around receipt of FSM when all children partake. Data on FSM eligibility by ethnic group indicates that as a percentage of an ascribed ethnicity, those from minority groups such as 'black' and 'mixed' are more likely to be eligible for FSM, indicating that those from ethnic minority groups are also more likely to fall within low-income families. Research by the Child Poverty Action Group (CPAG)[64] has shown that hundreds of thousands of schoolchildren live in poverty but are not currently eligible for free school meals. This is particularly an issue in London where living costs (particularly rents) are higher. One threshold for the whole of the UK means that many	

[64] https://cpag.org.uk/news-blogs/news-listings/region-number-children-poverty-not-eligible-free-school-meals

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	Children of low-income parents are more likely to experience food insecurity (see 3.6.9). Qualitative studies identify that food insecure children in England experience feelings of stigma and shame (Connolly, 2022[56]; O'Connell and Brannen, 2022[57]). There is also evidence that despite school efforts to minimise identification of children eligible for FSM, experiences of means tested free school meal provision can also lead to embarrassment and shame (Sahota et al., 2014[58]; O'Connell and Brannen, 2022[59]). The systematic review finds evidence that universal meal provision can lead to reduced stigma.		families living in relative poverty are not eligible for FSM under the current government criteria. A move to UFSM would ensure that for those families living in low-income households, unable to afford to pay for school lunches, but not meeting the current eligibility criteria for FSM, would have access to higher nutritional school meals than the current lower nutritional packed lunches they may be having. Illiteracy amongst parents, whether through lack of education or not having English as a first language, may possibly impact on those who do currently qualify for FSM being able to access current FSM as they are unable to navigate the system/fill in the relevant forms. The receipt of a free school meal may have benefits for improving attendance both through reduced health related absence but also accessing a free lunch being a motivating factor. The data shows a correlation between levels of income deprivation within a local authority area and school attendance (see 3.7.2)	
	Within the UK there is consistent evidence that packed lunches have a lower nutritional content than school lunches (Stevens et al.,		**Further considerations** Concerns that UFSM will reduce the numbers eligible for FSM signing up for FSM – which may impact on	Consider whether all pupils should register for UFSM. In a

[56] Connolly, A. (2022) Understanding children's lived experiences of food insecurity: a study of primary school-aged children in Leeds. PhD thesis, University of Leeds.

[57] O'Connell, R. and Brannen, J. (2021) Families and Food in Hard Times: European comparative research. London: UCL Press. DOI:10.14324/111.9781787356559

[58] Sahota, P., Woodward, J., Molinari, R., and Pike, J. (2014) Factors influencing take-up of free school meals in primary and secondary school children in England. Public Health Nutrition. 17(6)1271-9.

[59] O'Connell, R. and Brannen, J. (2021) Families and Food in Hard Times: European comparative research. London: UCL Press. DOI:10.14324/111.9781787356559

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	2013[60]; Evans et al., 2016[61]; Evans et al., 2020[62]), particularly for children within low-income households (Stevens and Nelson, 2011[63]).		Pupil Premium[65], with potential repercussions for school's financial resources. This is likely to have a disproportionately greater impact in more deprived areas where there may be a shortage of other funding streams such as fundraising through 'friends of' schemes. Grant conditions for schools have tried to address this by stating that '*To mitigate against this, we would encourage consideration of best practice in promoting registration (and the benefits to schools) including models where all parents are required to complete registration'*. Concerns about potential impacts at the end of the one-year pilot period if household finances have adjusted to a 'new normal'. This would be a particular issue for low-income families with limited finances.	review of 'the effectiveness of Islington's Free School Meals policy[66]' they found that by asking every parent to register for Islington's UFSM offer, children were identified who might not have registered but who were eligible for FSM. As a result, the borough has benefitted from an additional £500k

[60] Stevens, L., Nicholas, J., Wood, L. and Nelson, M. (2013) School lunches v. packed lunches: a comparison of secondary schools in England following the introduction of compulsory school food standards. Public Health Nutrition, 16(6), 1037–1042. DOI:10.1017/S1368980013000852.

[61] Evans, C.E.L., Mandl, V., Christian, M. and Cade, J.E. (2016) Impact of school lunch type on nutritional quality of English children's diets. Public Health Nutrition, 19(1) 36-45. DOI:10.1017/S1368980015000853

[62] Evans, C.E.L., Melia, K.E., Rippin, H.L., Hancock, N., and Cade, J. (2020) A repeated cross-sectional survey assessing changes in diet and nutrient quality of English primary school children's packed lunches between 2006 and 2016. BMJ Open 10(1) e029688. DOI:10.1136/ bmjopen-2019-029688

[63] Stevens. L. & 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. Journal of Human Nutrition and Dietetics, 24 (3), 223-232. DOI:10.1111/j.1365-277X.2010.01148.x

[65] The pupil premium is a grant given by the government to schools in England to decrease the attainment gap for the most disadvantaged children, whether by income or by family upheaval. For each pupil who is eligible for free school meals or has claimed free school meals in the last six years, their school receives financial income.

[66] Islington Corporate Director for Children, Employment and Skills (2019) The Effectiveness of Islington's Free School Meals Policy. https://democracy.islington.gov.uk/documents/s17053/The%20effectiveness%20of%20Islingtons%20Free%20School%20Meals%20policy.pdf#:~:text=As%20outlined%20below%2C%20Islington%20currently%20has%20positive%20results,London%20and%20national%20averages%20%2889%25%20and%2086%25%20respectively%29.

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
				pupil premium funding.
Other relevant groups *e.g.: Carers, people experiencing domestic and/or sexual violence, substance misusers, homeless people, looked after children, ex-armed forces personnel, people on the Autistic spectrum etc*	Those with caring responsibilities are less likely to be in employment than the general population and more likely to be living in relative poverty (see Section 3.6.10)		**Positives/strengths** Those with caring responsibilities may disproportionately benefit from the financial relief provided by this proposed policy.	

6. Ongoing work

EqIA is an ongoing process and should be reviewed and updated throughout the development of the proposed UFSM policy to reflect any challenges or opportunities that emerge, and to ensure that the policy development takes account of any key equality issues raised by stakeholders and local communities through any ongoing engagement.

This EqIA work also forms part of a wider piece of Integrated Impact Assessment (IIA) work. The outcomes from the environmental, health and economic assessment work undertaken as part of this IIA may identify new/additional equalities issues that should feed in to the EqIA, as and when they become available.

The outcomes and insights from upcoming, ongoing stakeholder engagement on the UFSM, to be carried out in June 2023, will also feed into the EqIA.