
MAYOR OF LONDON

Updated Integrated Impact Assessment Universal Free School Meals

June 2024



Executive summary

The Mayor of London believes that all Key Stage 2 (KS2) children in state-funded primary schools, including state-funded special schools and alternative provision (AP), should have access to the free school meals (FSM) that are currently available. The funding will continue helping to address the cost-of-living crisis, and will cover the cost of meals in term time.

In February 2023, the Mayor announced a £130m emergency funding plan to help families with the spiralling cost of living, by launching a world-leading policy offering universal free school meals (UFSM) to all KS2 children attending a state-funded primary school.

Due to the ongoing cost-of-living crisis, and the policy's overwhelming success in its first year, the Mayor of London announced a further £140m in his 2024-25 budget to extend the UFSM scheme for another year, from September 2024, to continue helping families financially.

Under the national FSM scheme, in addition to a universal offer for children in KS1 and Reception, children in KS2 (Years 3 to 6) are eligible for FSM if they meet the national government's eligibility criteria. Most commonly, this means living in a household that is on universal credit and earns less than £7,400 a year (after tax and not including benefits), regardless of how many children there are in the family. The Mayor's UFSM scheme is not intended to displace national government funding for KS2 children already in receipt of FSM. The UFSM policy is in line with national government eligibility criteria for KS1.

In line with the national government's FSM scheme, the Mayor of London's policy covers state-funded primary schools (including pupil referral units, special schools, faith schools and AP). Every borough in the capital will receive £3.00 per meal in funding to enable schools to deliver the meals over the next year. This is higher than the amount they receive from national government, which recently increased its funding from £2.41 to £2.53 per meal following the Mayor's intervention.

This price per meal has been uplifted since the first year of the policy to reflect feedback on implementation from schools and boroughs in year one, and increasing cost-of-living pressures. It is 138.5 per cent more than our offer for UFSM in the 2023-24 academic year.

Additional funding will be made available to cover the higher price of providing kosher meals of £3.85 per meal for Jewish state-funded schools, as well as any exceptional costs to support the higher cost of meals for pupils with special educational needs and disabilities (SEND), where needed.

Five London boroughs provided their own version of FSM to their London primary state-funded schools in 2022-23. As with the 2023-24 rollout of the UFSM scheme, funding will be allocated to these boroughs as if they had not previously provided this function. The proposed allocation to these boroughs has been worked out in the same way as others, and they are encouraged to use the offset funds to support families in financial hardship because of the cost-of-living crisis.

Each borough will have the opportunity to secure additional funding, if they can show that uptake of the scheme has exceeded the assumed take-up rate (90 per cent) at which they have been funded.

This policy means that nearly 300,000 families now have one less bill to worry about as they face the spiralling cost-of-living crisis. This will save them upwards of £500 per eligible child, per year.

A vital lifeline to many families in London

To inform the policy from an early stage, an Equality Impact Assessment (EqIA) was conducted and published in July 2023. This has been updated to ensure the policy captures learning from Year 1 and takes account of any new insights or evidence.

Following this, an Integrated Impact Assessment (IIA) was published in November 2023. This aimed to understand the potential impacts of the Mayor's UFSM scheme; and how the scheme might be refined to address some of those impacts. This has been updated on account of the policy extension into the 2024-25 academic year.

This subsequent IIA report draws together assessments on the equalities, health, economic and environmental impacts of the Mayor's scheme – recognising that consideration of these impacts is critical for better policies and programmes. These assessments also draw on the policy's evidence review and stakeholder engagement to inform findings (Theory of Change).

As well as assessing the potential impact(s) of the Mayor's scheme, the IIA outlines areas for further consideration, mitigation and enhancement. These are summarised below, and outlined in detail in the body of this IIA report.

The original policy assessments of the UFSM scheme remain similar in the context of the policy extension, as neither the wider landscape nor the scheme itself have materially changed since the UFSM launch (September 2023). The [EqIA?] and IIA will be kept up to date and revised throughout the year, as new data and evidence become available.

Key findings

Universal provision will have a positive economic impact on Londoners who face relatively high living costs compared to the rest of the UK. It will also bring wider benefits to London's economy.

- For the last 20 years, London's poverty rates have consistently been amongst the UK's highest. Across English regions, London also has the highest proportion of children in poverty that do not receive FSM. As the Mayor's FSM offer is universal, regardless of household income, this will allow Londoners who live in poverty, but do not meet the national government's prescriptive eligibility criteria, to benefit from the scheme, thereby reducing financial pressures on households.
- In March 2024, the Office for Budget Responsibility (OBR) put food inflation projections for 2024-25 at 2.1 per cent. To support UFSM delivery for the 2024-25 school year, the grant allocation per meal has risen from £2.65 to £3.00. This goes beyond food cost projections developed by the OBR in November 2023.

Cost projections from the refreshed economic assessment for UFSM suggest that households could save up to £1,000 per KS2 child across the two academic years. Cost savings may be particularly significant for low-income households; Black, Asian and

Minority Ethnic households; single-parent households; and/or disabled households – all of which are more likely to feel the effects of the cost-of-living crisis.¹

- Extending the UFSM policy is expected to positively impact London's businesses and wider economy. In October 2023, a cost-benefit analysis showed that universal provision of meals could generate an additional £2.1bn for London in output between 2024 and 2030.²
- In some boroughs, the additional investment will result in increased workforce requirements, thus having a positive impact on local employment.
- Flexibility has been embedded in the UFSM policy to support schools with implementation challenges. In response to challenges, the GLA has provided additional funds to support schools with any implementation barriers, including support for additional costs associated with some faith-based meals and for pupils with SEND.

The scheme is also predicted to have positive effects on the health and wellbeing of the children and their wider families.

- The guarantee that children can access at least one meal a day is expected to continue improving the health and wellbeing of those experiencing food insecurity. This will bring benefits for children's growth, development and educational attainment; and mental health benefits for their families, by reducing concerns about food insecurity. Early insights from our work with schools and boroughs in the scheme's first year corroborate this, and will be explored further over the second year.
- There is not enough evidence to show a direct correlation to impacts on school attendance. However, the evidence shows that children who are well fed can focus better on lessons, and consequently have better educational attainment. The longer-term impact evaluation of the scheme will investigate attendance.
- On pupil health, new evidence from the Institute for Social and Economic Research (ISER), Child Poverty Action Group (CPAG) and the Education Union shows that FSM can have a positive effect on child obesity rates, eating habits, improved home-school relationships and uptake amongst government FSM eligible pupils. As the London UFSM scheme continues into a second year, an evaluation could consider exploring such impacts further.

The policy is assessed to have a positive impact on access to the scheme – but London is home to many communities with different needs. As such, the UFSM scheme must build diversity and inclusion into its design and monitoring approach.

- The UFSM grant principles (as set out on page 10 onwards, below) commit to ensuring that food is culturally appropriate, in line with the national government school food standards.

¹ See EqIA and section on baseline data.

² IoUH, An Economic Contribution Analysis of Free School Meal Provision Expansion, November 2023

- While the Mayor's price of £2.65 per meal was beyond the national government rate, the EqIA found that this could still be too low for some children with specific dietary needs connected to their faith and/or SEND. The price was therefore raised to £3.00 for year two, to sufficiently account for implementation needs.
- In year one of the policy, following completion of the EqIA, the Mayor approved a contingency fund to help with extraordinary costs associated with implementing the scheme, including additional support for SEND pupils. The contingency funding was also used to address unforeseen implementation issues for schools and boroughs, which may inhibit their participation in the scheme.
- The cost for kosher meals in London is higher than for other meals. So, as in year one, top-up funding per meal has been allocated for state-funded Jewish schools as part of the 2024-25 funding formula.
- For parents/families who do not have English as their primary language, key information about UFSM will be translated to ensure accessibility. There will be further engagement with communities, to improve their access to meals.
- Data from May 2024 concerning pupil premium indicates that, despite fluctuations at a borough level, the city averages have not fluctuated significantly since the Mayor's scheme was introduced in 2023. However, the GLA will continue to support boroughs in their adoption of auto-enrolment, to ensure all eligible pupils are registered with the government FSM scheme. This will help to ensure that income for schools from the pupil premium remains unaffected.

Monitoring and evaluation should be underpinned by the IIA recommendations, emerging evidence and the Theory of Change. There are opportunities to expand the monitoring and evaluation remit as the scheme continues.

- As the policy continues into its second year, addressing the cost-of-living crisis will remain a key objective. Assessing the impact on household financial circumstances and associated outcomes identified in the Theory of Change will continue to be monitored into the second year of the policy.
- The Theory of Change was published in June 2023. It was reviewed following the announcement of the extension, with emerging insight from year one considered. Latest research continues to show the success of the UFSM scheme in alleviating household financial hardship and reducing food insecurity. A study by the ISER reported household savings of £41 every four weeks. A slight improvement in reading scores was also found, but no improvement in maths or writing was observed.³
- To inform the monitoring and evaluation strategy for future years, there has been a review of the year one IIA; the Theory of Change; the latest literature; and engagement with expert stakeholders. The GLA undertook analysis of the impacts, and identified potential gaps to explore further. Health impacts including physical health, weight and height could be investigated further as the scheme extends or

³ ISER, [The impacts of Universal Free School Meals schemes in England](#), February 2024

becomes permanent. Having a better understanding of the food served, and improving access across all pupil groups, could also be explored in year two.

- The GLA will continue to track uptake of the Mayor's FSM to assess the scheme's reach amongst pupils with different demographics and protected characteristics. These findings will continue to guide policy development and support for specific groups.
- The removal of transitional protections may lead to a significant decrease in pupil applications. The GLA will continue to monitor the annual data on the national government FSM and the pupil premium.
- The GLA will continue to monitor in-year impact, and gather insight amongst headteachers, parents, children and boroughs, to guide the policy's implementation, and understand possible issues relating to infrastructure and implementations.
- The GLA will continue to support independent evaluations – including the process and lived-experienced evaluations (due to be published in autumn 2024) and the impact evaluation (due to be published in 2025-26).
- Following the recent government ban on single-use plastics, and the Extended Producer Responsibility scheme (introducing simpler recycling), caterers are required to reduce the amount of plastic packaging in school food production. There's an opportunity for the GLA to convene boroughs on this latest government legislation; and consider the role they could play in monitoring packaging relating to UFSM. Boroughs are requested to adhere to a set of grant conditions and principles that have been developed by the GLA. These include considering sustainable catering guidelines and environmental aims.

Introduction

Purpose of the IIA

The IIA is a tool for identifying potential impacts associated with the Mayor's UFSM scheme. The IIA includes ways to avoid and mitigate any adverse impacts; and enhance the benefits of the scheme. The purpose of the IIA is to promote better integration of social, environmental and economic considerations in developing key policies and programmes. This IIA draws together the following assessments:

- an Equalities Impact Assessment (EqIA)
- an Economic Impact Assessment (EclA)
- a Health Impact Assessment (HIA)
- an Environmental Assessment (EA).

The assessment findings have been combined into one conclusion that highlights the positive impacts of the scheme; and areas for further consideration, mitigation and enhancement. This has been organised under three themes:

- London's people (incorporating the EqIA and HIA)
- London's economy (incorporating the EclA)
- London's environment (incorporating the EA).

These will be used by the GLA to inform further policy development.

Development of the IIA

- The Mayor's UFSM policy launched in 2023 as a response to the cost-of-living crisis. As such, the policy had to be developed quickly to ensure readiness for the academic term starting in September 2023.
- The UFSM policy was refined based on the findings outlined in the IIA and EqIA.
- This current IIA report has been informed by:
 - the IIA and EqIA
 - a revised assessment of new data and current literature
 - a review of the Theory of Change, considering policy parameters for year two
 - stakeholder engagement.

Details of the policy

Policy details

The Mayor of London believes that all KS2 children in state-funded primary schools, including state-funded special schools and AP, should have access to the FSM that are currently available. The funding is to help address the cost-of-living crisis, and will cover the cost of meals within term time.

In February 2023, the Mayor announced a £130m emergency funding plan to help families with the spiralling cost of living by launching a world-leading policy offering UFSM to all KS2 children attending a state-funded primary school.

Due to the ongoing cost-of-living crisis, and the policy's overwhelming success in year one, the Mayor of London announced a further £140m in his 2024-25 budget to extend the UFSM scheme for another year, from September 2024, to continue helping families financially.

Under the national FSM scheme, in addition to a universal offer for children in KS1 and Reception, children in KS2 (Years 3 to 6) are eligible for FSM if they meet the national government's eligibility criteria. Most commonly, this means living in a household that is on universal credit and earns less than £7,400 a year (after tax and not including benefits), regardless of how many children there are in the family.

The Mayor's UFSM scheme is not intended to displace national government funding for KS2 children already in receipt of FSM. The UFSM policy is in line with national government eligibility criteria for KS1.

In line with the national government's FSM scheme, the Mayor of London's policy covers state-funded primary schools (including pupil referral units, special schools, faith schools and AP). Every borough in the capital will receive £3.00 per meal in funding to enable schools to deliver the meals over the next year. This is higher than the amount they receive from national government, which recently increased its funding from £2.41 to £2.53 per meal following the Mayor's intervention. This price per meal has been uplifted since the first year of the policy to reflect feedback on implementation from schools and boroughs in year one.

In year two, funding is expected to help up to 300,000 extra primary school children; and save London families over £500 per eligible child across the year.⁴

The Mayor will fund the price per meal at £3.00. This is above the standard government rate of £2.53 per meal, which was increased from £2.41 per meal in June 2023.

All schools will receive a grant based on an assumed 90 per cent uptake. However, boroughs that can show a higher uptake will receive further funding.

Boroughs that previously funded their own provision of UFSM will be allocated funding as if they had not done so. These boroughs have been asked to use the offset funds to support families in financial hardship; or to support other cost-of-living related measures.

⁴ More information on GLA cost savings calculations be found on the [UFSM website](#).

Policy access

The GLA conducted further assessments around the feasibility of extending the policy's scope beyond the national government FSM scheme. These assessments informed the Mayoral Decision for the programme.⁵ The resulting Independent Schools Analysis, set out in **Annex C**, has been revisited in light of the extra year extension.

The UFSM scheme is just one measure within a range of steps the Mayor is taking to help Londoners. The Mayor continues to do all he can to support Londoners of all backgrounds affected by the cost-of-living crisis, including funding more than 10m meals during the school holidays and at weekends through a partnership with the Felix Project and the Mayor's Fund for London.

Grant conditions and principles

A set of standard grant conditions and principles has been developed by the GLA. Grant agreements have incorporated the following eligible categories for expenditure:

'Provision of food: The grant must be used for delivery and implementation of the UFSM programme. We encourage you to use any surplus to support schools to deliver the scheme and to help solve any local challenges.'

The associated principles of the grant agreement ask boroughs to take consideration of the following:

- Pay London Living Wage (LLW) to catering staff, and include LLW as a requirement in any future tenders; and commit to wider action to support families struggling due to the cost-of-living crisis.
- Continue to meet the statutory school food standards and ensure school food is culturally appropriate.
- Take a whole-school approach to healthy eating, participate in Healthy Schools London (HSL)¹ and adopt of water-only policies.
- Meet sustainable catering guidelines and support environmental aims. This should include considering the role the recipient, and those involved, could play in monitoring packaging and food waste relating to UFSM.
- Play an active role in sharing information with schools and families about registering for pupil premium and cascading GLA communications material.

Background

In England, all state-funded school children at KS1 (Reception through to Year 2) receive FSM as part of the government's Universal Infant Free School Meals (UIFSM) scheme. At KS2 (primary school children in years 3-6), only those that meet specific eligibility criteria receive FSM.

The following London boroughs (LBs) were already implementing UFSM for all primary-school pupils before September 2023:

⁵ GLA, [MD3146 Primary School Universal Free Schools Meal Provision 2023-24](#), July 2023

- LB Southwark has funded FSM to all primary school children for the last 10 years. Southwark is now rolling out a pilot scheme for secondary school pupils.
- LB Newham has funded FSM to all children in primary schools since 2009.
- LB Tower Hamlets has been providing FSM to all primary school children since 2014. It is now rolling out a pilot scheme for secondary school pupils up to Year 11.
- In January 2023, LB Westminster started providing free school lunches to all children attending primary school in Westminster City Council.
- LB Islington has been providing FSM to all primary school children since 2011.

In the rest of England, a child may be eligible for FSM if their household is in receipt of benefits, including (but not limited to) universal credit. However, to qualify for universal credit a household can earn no more than £7,400 per year (after tax and not including benefits). This is regardless of the number of children in the family.

Research by CPAG⁶ has shown that hundreds of thousands of school children live in poverty but are ineligible for government FSM. 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 (LA), or via their child's academy school, to claim FSM. Recent government estimates on claim rates indicate that, in London, around 20 per cent of children eligible for FSM had not taken up the offer.⁷ Although there are limited studies looking at why this might be, one identified that stigma, quality of school meals and a lack of knowledge around entitlement had contributed to lack of take-up.⁸

Historically, families who were undocumented due to their immigration status, and/or had no recourse to public funds (NRPF) (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-19, and permanently extended to all households with NRPF in January 2023.

Government guidance

National government guidance has recently been updated on the policy position for children receiving education otherwise than at school (EOTAS). The national guidance states that “**no specific provision is made in legislation** for FSM to be provided to children who are in receipt of EOTAS”.⁹

However, the guidance says that the **government expects local authorities to consider making equivalent food provision for children who are receiving EOTAS**, and who meet both of the following criteria:

⁶ CPAG, By region: number of children in poverty not eligible for free school meals, 1 September 2022

⁷ DfE, Schools, pupils and their characteristics, 13 June 2023

⁸ Yang TC, Power M, Moss RH, et al, 'Are free school meals failing families? Exploring the relationship between child food insecurity, child mental health and free school meal status during COVID-19: national cross-sectional surveys', *BMJ Open*, 2022; 12:e059047. doi: 10.1136/bmjopen-2021-059047

⁹ DfE, Free School Meals: Guidance for local authorities, maintained schools, academies and free schools, March 2024

- the child would meet the benefits-related criteria for FSM if they were in a state-funded school
- the meals would be provided in conjunction with education; and would, in line with the aim of FSM provision, enable the child to benefit fully from that education.

The Department for Education (DfE) states:

“in considering their approach to making food provision for relevant children, and in making decisions on particular cases, LAs should act in accordance with the Human Rights Act and the European Convention on Human Rights and comply with the public sector equality duties”.

The recently updated guidance also outlines the legal duty on schools to make reasonable adjustments for disabled children on their rolls. The guidance states that schools are:

“best placed to determine the exact nature of a reasonable adjustment in relation to food provision, taking into account the individual circumstances of the child and their family, as well as schools’ obligations under the School Food Standards”.

A food voucher would be deemed a reasonable adjustment.

Schools are not obliged to make reasonable adjustments for children who are not disabled. However, schools should take “appropriate action” to support pupils with medical conditions, including a food allergy.

In light of recent government guidance, the GLA’s policy has therefore been updated: it will now be the LA’s responsibility to consider these situations on a case-by-case basis. Boroughs may use GLA funding for these pupils, should it be deemed appropriate.

Expected outcomes from the Mayor’s scheme:

- London’s primary age children attending state-schools will have access to at least one nutritious meal a day during term time.
- Families will have one less cost to meet, and thus will feel a positive impact on their daily living costs. This free provision will support families experiencing food insecurity and may reduce their need for emergency food aid, such as food banks.
- There will be improved awareness of, and encouragement to take up, existing schemes to support London families during the cost-of-living crisis.
- Families who most need this support will have saved money (from not buying school lunches).
- Families will be less anxious about the cost of school meals. Children will be less hungry at school, and will experience benefits such as reduced stigma and better concentration.

Approach to the IIA

The study area includes all 33 LAs across the whole Greater London area, as mapped in Figure 1, below.

Figure 1: LAs in the study area



Overview of the IIA process

The IIA is a means by which different technical assessments are brought together in a holistic and integrated manner. The IIA tests the performance of the UFSM policy to identify the likely positive and negative effects. Where adverse effects are predicted, the IIA identifies the measures that can mitigate them.

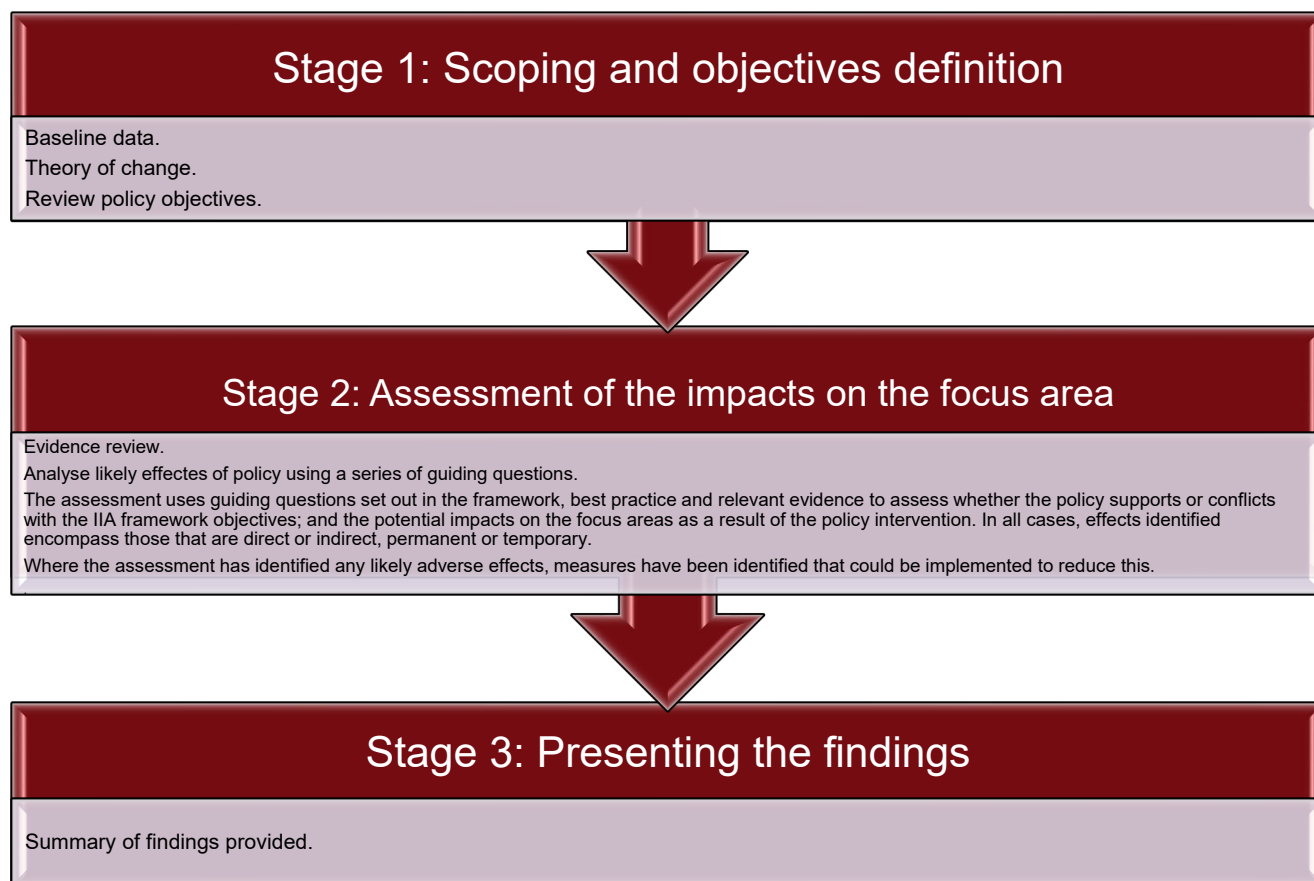
The IIA brings together multiple assessments, each with their own legal requirements and/or guidance to adhere to and apply. The section below describes the methodologies for the component parts of the IIA, based on relevant legislation, guidance and best practice.

The IIA methodology has been guided by the Environmental Assessment of Plans and Programmes Regulations 2004 (the Strategic Environmental Assessment (SEA) Regulations).

The EqIA was published before the full IIA, and was accompanied by a supplementary analysis produced by the GLA to consider impacts on London's independent schools (with a particular focus on faith schools). This supplementary analysis is set out in **Annex C**.

The IIA has also used the Theory of Change (set out in **Annex A**) for this policy to frame its review. The Theory of Change has been reviewed since 2023 and informs this IIA.

In developing the IIA, a range of stakeholders were interviewed and involved in shaping some of the policy.



Scope of each assessment

EqlA

Legislation and guidance

The Equality Act 2010¹⁰ provides that, in the exercise of their functions, public bodies must have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it. This is known as the public sector equality duty.

An EqlA is a means of systematically identifying and assessing the likely effects arising from the design and implementation of a plan, policy or project for people sharing one or more protected characteristics. The GLA's internal EqlA framework and guidance were

¹⁰ Government Equalities Office/Equality and Human Rights Commission, Equality Act 2010: guidance, 16 June 2015

refreshed in 2023. These updated tools have been used to form the equalities considerations of this IIA.

Methodology

The EqIA has been incorporated into the IIA framework.

The EqIA has identified the likely effects of discriminatory practices; the potential to alter the opportunities of certain groups of people; and/or the effects on relationships between different groups of people that could arise as a result of the proposals.

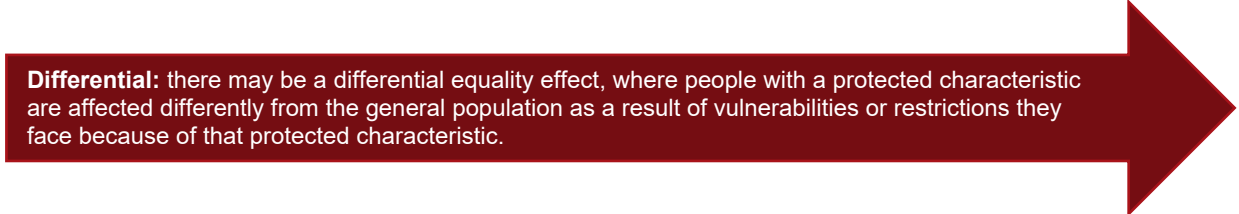
In order to understand which groups of people (or individuals) may suffer discrimination, the Equality Act sets out a series of “protected characteristics”:

- age
- disability
- gender reassignment
- marriage or civil partnership (in relation to the duty to have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act only)
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation.

The assessment has identified whether people with protected characteristics would be disproportionately or differentially affected by the proposals. This is further explained below:



Disproportionate: there may be a disproportionate equality effect, where people with a particular protected characteristic make up a greater proportion of those affected than in the wider population.



Differential: there may be a differential equality effect, where people with a protected characteristic are affected differently from the general population as a result of vulnerabilities or restrictions they face because of that protected characteristic.

Scope

Though only the first of three limbs of the Public Sector Equality Duty applies to the protected characteristic of marriage and civil partnership, the GLA has looked at the potential effects of the policy on single-parent households.

Whilst a Public Sector Equality Duty regarding socio-economic inequalities is included within the Equality Act, it has not been brought into force in England and is therefore not a legal requirement. Nonetheless, the GLA aims to incorporate socio-economic inequality within the scope of the IIA, as it is best practice to consider this topic in an EqIA; and to set out and consider its impact on individuals with protected characteristics. Socio-economic groups to be considered in the EqIA include those on low incomes, and those living in deprived areas.

Economic Impact Assessment

Legislation and guidance

The EclA has undertaken a distributional appraisal of food-cost savings for households; and an empirical analysis of effects on associated businesses and the wider economy.

There is currently no statutory legislation on undertaking distributional appraisals. This appraisal is therefore based on HM Treasury's Green Book.¹¹

Methodology

The distributional appraisal is based on the following stages:

- stage 1: building a baseline
- stage 2: projecting UFSM take-up
- stage 3: quantifying annual savings
- stage 4: quantifying relative savings.

Drawing on the above socio-economic assessment) guidance and baseline information, objectives and guiding questions relevant to economics are included in the IIA framework. The assessment against the objectives has been informed by the outcomes of the distributional analysis.

Scope

The EclA has looked at:

- any changes in eligibility
- take-up rates
- current food costs for households
- relative household savings
- wider economic impacts including wage impacts; capital costs; health, education and productivity impacts; and time savings.

¹¹ HM Treasury, The Green Book: Central government guidance on appraisal and evaluation, March 2022

Health Impact Assessment

Legislation and guidance

The overarching aim of the HIA is to ensure that plans and policies minimise negative health impacts and maximise positive health impacts.

There is currently no statutory guidance on how to undertake an HIA. The scope, approach and methodology are driven by a range of factors – including non-statutory guidance and best practice, stakeholder interests, and project or plan-specific issues.

Appropriate guidance and health assessment tools relevant to this HIA include:

- Public Health England's (PHE's) HIA in Spatial Planning report¹²
- the Institute of Environmental Management's guides: 'Effective Scoping of Human Health in Environmental Impact Assessment' and 'Determining Significance for Human Health in Environmental Impact Assessment'
- the London Healthy Urban Development Unit (HUDU) Rapid HIA Tool¹³
- the Dahlgren and Whitehead model of health determinants.

Methodology

Specific objectives and guiding questions related to health are included in the HIA framework. These have been informed by the tools and guidance documents described above, particularly the National Health Service (NHS) HUDU assessment tool and the health outcomes set out in PHE's HIA in Spatial Planning report.

Scope

A scoping exercise was carried out to determine which wider health determinant topics should be assessed further as part of the HIA. This was informed by a desk-based review of relevant literature and analysis of baseline data.

The following topics were included for assessment:

- access to healthy food
- access to education
- social cohesion and inclusive design.

Environmental Assessment

Legislation and guidance

A Sustainability Appraisal (SA) and an SEA are required under two separate pieces of legislation. The SA encompasses the requirement, under SEA regulations, for an

¹² PHE, *Health Impact Assessment in spatial planning*, October 2020

¹³ London HUDU, *Rapid Health Impact Assessment Tool*, October 2019

assessment of the likely significant environmental effects arising from a plan or programme. The SA ensures that potential environmental effects are given full consideration alongside social and economic issues.

Key guidance that informs the SA and the SEA includes:

- the Royal Town Planning Institute (RTPI) guidance, 'SEA: Improving the effectiveness and efficiency of SEA/SA for land use plans'¹⁴
- Department for Levelling Up, Housing and Communities (DLUHC) guidance on the SEA and the SA¹⁵
- Ministry of Housing, Communities and Local Government (MHCLG) guidance on the SEA Directive.¹⁶

Methodology

The EA will draw on the SEA guidance, and collated baseline information, to assess the UFSM policy. The assessment used the guiding questions to determine whether the UFSM policy supports or conflicts with the framework objectives.

Scope

The following environmental topics, which had the potential to be affected (either positively or negatively) by the policy, were reviewed:

- air quality
- climatic factors
- waste.

Supporting technical appendices

The IIA is supported by detailed technical reports including:

- the Theory of Change (**Annex A**)
- the EqIA (**Annex B**) and supplementary paper on non-state funded schools (**Annex C**)
- evidence review
- quantitative data.

¹⁴ Royal Town Planning Institute, Strategic Environmental Assessment: Improving the effectiveness and efficiency of SEA/SA for land use plans, 17 January 2018

¹⁵ DLUHC and MHCLG, Strategic environmental assessment and sustainability appraisal, 31 December 2020

¹⁶ MHCLG, Strategic Environmental Assessment Directive: guidance, 2 September 2005

Assumptions and limitations

The following assumptions and limitations have been made:

- The policy is aligned to the scope of the government's current FSM scheme, as set out in the DfE guidance.¹⁷ The government's scheme does not extend to pupils at private or independent schools; this approach has been adopted in the Mayor's policy. The policy will cover state-funded primary schools, pupil referral units and special schools, including faith schools. Engagement and analysis 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 the GLA and can be found as a supplementary paper to the EqIA. **Annex B** contains the EqIA, and **Annex C** contains the supplementary analysis. Following this work, a decision was taken not to extend the Mayor's policy to independent schools.
- With regard to the EqIA and the protected characteristic of belief/faith, the assessment has focused on faiths for which census data on prevalence is available – namely the Christian, Buddhist, Hindu, Jewish, Muslim and Sikh faiths. However, there is an awareness that other faiths also exist, and members of these communities may have specific dietary needs associated with their beliefs. These include, but are not limited to, Rastafarians; members of the Church of Jesus Christ of Latter-day Saints; and Seventh-day Adventists.
- It is assumed that all of London's eligible schools will continue to take up the funding offer.
- It is assumed that the cost-of-living crisis does not escalate further.
- There is no equivalent policy, operating at such scale and scope, that can enable direct comparison. As such, there are some unknowns with this policy.
- A full IIA was produced alongside initial development of the policy; this has been updated in light of the policy extension. The IIA and the EqIA will continue to be reviewed at regular intervals, and when specific need arises.

IIA objectives, baseline and context review of relevant plans, programmes, strategies and objectives

It is important to review the environmental, social and economic objectives contained within key legislation and strategies that are relevant to the UFSM policy. This section provides a summary of the plans, programmes and strategies at a regional (London) scale that inform the IIA of the UFSM policy.

Several strategies set out the Mayor's vision for specific topic areas, including:

- the London Food Strategy (2018)¹⁸

¹⁷ DfE, Free school meals: guidance for schools and local authorities, 31 January 2023

¹⁸ GLA, The London Food Strategy, December 2018

- the London Plan (2021),¹⁹ which brings together the geographic and locational aspects of other strategies, and provides the policy framework for the Mayor's own decisions on strategic planning
- the London Health Inequalities Strategy (2018)²⁰
- the Mayor's Equality, Diversity and Inclusion Strategy (2018)²¹ and the Mayor's Equality Objectives (2022), objective 7, to "remove the barriers preventing children and young Londoners from realising their potential now and in later life"
- the London Environment Strategy (2018).²²

Following a review of the following policies and strategies, new topics, sub-topics and key considerations have been identified (**Table 1**). These are also aligned to the Theory of Change.

Table 1: Key considerations identified in the review of relevant policies

Overarching topic	Sub-topic	Key considerations
Diversity of experience and strength of effect by different socio-economic and demographic groups, household characteristics and geographical locations	Population and equity	<ul style="list-style-type: none"> • Support educational 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. • Respond to faith and cultural needs.
Economics – local economy	Wider economic impacts	<ul style="list-style-type: none"> • Support schools' capability to provide UFSM. • Promote local economic multiplier effect. • Support local jobs and businesses.
Child and family health and wellbeing	Mental and physical health	<ul style="list-style-type: none"> • Access to healthy food. • Help children maintain a healthy weight. • Support water-only primary schools. • Support educational institutions to provide programmes for healthier food, and to reduce health inequalities. • Support uptake of FSM and UFSM to reduce child food insecurity.
	Social cohesion and inclusive design	<ul style="list-style-type: none"> • Improve social cohesion and inclusion. • Reduce health inequalities and stigma.
Attainment	Education and skills	<ul style="list-style-type: none"> • Support the Office for Standards in Education, Children's Services and Skills

¹⁹ GLA, [The London Plan](#), March 2021

²⁰ GLA, [The London Health Inequalities Strategy](#), September 2018

²¹ GLA, [Inclusive London: The Mayor's Equality, Diversity and Inclusion Strategy](#), May 2018

²² GLA, [London Environmental Strategy](#), May 2018

Overarching topic	Sub-topic	Key considerations
		<p>(Ofsted) to adopt food as key indicator of a school's performance.</p> <ul style="list-style-type: none"> • Support further guidance to support implementation of school food standards and whole-school food policies. • Schools support health and wellbeing of children and families, particularly the most vulnerable. • If practical, food growing should be included in playgrounds and school sites, aiding educational benefits and health.
Environmental sustainability	Air quality	<ul style="list-style-type: none"> • Improve air quality and reduce exposure to harmful pollution, particularly in propriety areas (such as schools) and the most disadvantaged areas.
	Climate change and greenhouse gas emissions	<ul style="list-style-type: none"> • Promote low-emission vehicles, and/or reduce car dependency. • Support a low-carbon circular economy.
	Waste	<ul style="list-style-type: none"> • Reduce waste, particularly food waste and single-use plastic. • Promote a circular economy.
Mitigating the impact of the cost-of-living crisis	Income and poverty	<ul style="list-style-type: none"> • Improved economic welfare for households.
	Socioeconomic inequalities	<ul style="list-style-type: none"> • Support households in relative and absolute poverty by reducing financial pressures.

Baseline information and key considerations

A review of existing baseline information has been undertaken, to inform the objectives and guiding questions around which the UFSM policy will be assessed in this IIA. The table below provides a summary of the key baseline features and considerations for the assessment. These are aligned to the Theory of Change set out in **Annex A**.

Table 2: Key baseline features and considerations

Further details are set out in **Annexes A, B and C**.

Key baseline features	Considerations
Mitigating the impacts of the cost-of-living crisis	
HM Government FSM eligibility	
<ul style="list-style-type: none">• 27.7 per cent of school pupils in London are eligible for FSM, compared to 25.6 per cent in England.²³• 88 per cent of eligible pupils in London take FSM, compared to 82 per cent in England.²⁴• 41 per cent of London children in poverty do not receive FSM. This is the highest proportion of all regions in England.²⁵• 30 per cent of FSM-eligible pupils in London in the 2023-24 school year were White; 26 per cent were Black; 18 per cent were Asian; and 14 per cent were of Mixed ethnicity.²⁶• FSM-eligible pupils typically achieve lower GCSE attainment.²⁷• 38 per cent of children with SEND are eligible for FSM. This is significantly higher than children without educational needs.²⁸• In May 2024, pupil-premium application analysis showed no significant shift in the city average this academic year, following introduction of the UFSM scheme. However, there are some fluctuations at a borough level: 15 boroughs saw an increase in pupil-premium applications; 18 saw a decrease.• In December 2023, polling from YouGov, commissioned by City Hall, found that more than a third (35 per cent) of parents or carers of children under 18 were buying less	<ul style="list-style-type: none">• Understand and address why not all FSM-eligible pupils take FSM.• Address differences in eligibility for FSM across ethnic groups and amongst children with SEND.

²³ DfE, [Schools, pupils and their characteristics](#), 6 June 2024

²⁴ DfE, [Schools, pupils and their characteristics](#), 6 June 2024

²⁵ CPAG, [By region: number of children in poverty not eligible for free school meals](#), 1 September 2022

²⁶ DfE, [Schools, pupils and their characteristics](#), 6 June 2024

²⁷ House of Commons, [Food poverty: Households, food banks and free school meals](#), 2022

²⁸ DfE: Explore education statistics, [Special educational needs in England](#), 2023

<p>food and essentials, with 41 per cent using less water, energy or fuel to help them manage living costs. Three in ten (30 per cent) said they were ‘financially struggling’.²⁹</p>	
Population and demographics	
<ul style="list-style-type: none"> • London’s population is expected to rise to about 10m by 2040.³⁰ • London has a high population density (5,598 per km²) compared to the England average (434 per km²), especially within central boroughs.³¹ • The majority of households in London are single-family households.³² 	<p>Address the implications for the cost-of-living crisis on single-parent households.</p>
Equality groups/inequalities	
<ul style="list-style-type: none"> • London is more ethnically diverse than the rest of England – with 61 per cent of primary-school pupils in state-funded schools (across all years) identifying as Black, Asian, Mixed and/or ‘Other’.³³ • Within London, Black, Asian and Minority Ethnic groups are far more likely to be in poverty (33 per cent) than White people (18 per cent).³⁴ • The percentage of individuals identifying as Buddhist, Hindu, Jewish, Muslim, Sikh or part of an ‘Other’ religion in London is relatively high as compared to the England average.³⁵ • Out of 1,787 state-funded primary schools in London, 512 (28.7 per cent) are categorised as faith schools.³⁶ • In total there are 143,814 pupils in London faith schools. This is approximately 21 per cent of all primary-school pupils in London.³⁷ 	<ul style="list-style-type: none"> • Respect and cater for ethnically and religiously diverse boroughs. • Consult with ethnic minorities, religious groups and vulnerable groups.

²⁹ All figures, unless otherwise stated, are from YouGov Plc. Fieldwork was undertaken between 8 and 14 December 2023. The survey was carried out online. The figures have been weighted and are representative of all London adults (aged 18+). The sample size for parents or carers of children under 18 is 233. ‘Financially struggling’ combines responses for “I am having to go without my basic needs and/or rely on debt to pay for my basic needs” and “I’m struggling to make ends meet” (London Datastore, [GLA cost of living polling](#)).

³⁰ GLA, housing-led population projections, 2023

³¹ ONS, [Population density](#), 2021

³² ONS, Household composition, 2021

³³ DfE, [Schools, pupils and their characteristics](#), 6 June 2024

³⁴ Trust for London, [London’s Poverty Profile](#), 2023

³⁵ ONS, Religion, 2021

³⁶ DfE, [Get Information about Schools](#), 2024

³⁷ DfE, [Get Information about Schools](#), 2024

<ul style="list-style-type: none"> • According to 2021 data, 4.9 per cent of London's children aged 5-9 are disabled. These values are slightly lower than the England average of 6.5 per cent.³⁸ • The LBs with the highest proportion of disabled children aged between five and nine are Greenwich (3.5 per cent), Tower Hamlets (3.2 per cent), Islington (3.1 per cent).³⁹ • SEND is more prevalent among disadvantaged pupils than among their less disadvantaged peers – a situation that is common to all four nations of the UK.⁴⁰ • The highest proportions of SEND children eligible for FSM are in Islington (56 per cent) and Camden (55 per cent). The lowest are in the City of London and Harrow (both 24 per cent), and Redbridge (25 per cent).⁴¹ 	
Employment, income and local economy	
<ul style="list-style-type: none"> • Over 30 per cent of employment type is made up of jobs classified as 'higher and lower managerial, administration and professional occupancy'.⁴² • Employment deprivation, defined as the number of adults involuntarily excluded from the labour market, is greatest in Islington, Hackney, and Barking and Dagenham.⁴³ • Within London, the boroughs with the highest child poverty rates are Tower Hamlets, Newham, Barking and Dagenham, and Hackney.⁴⁴ • In 2020-21, 16.6 per cent of all London children were living in poverty.⁴⁵ • Latest data from the ONS shows that the number of Londoners living below the poverty line dropped between 2017-18 and 2019-20; however, it remains higher than the national average.⁴⁶ • As of April 2022, just under 14 per cent of employee jobs in London paid below the LLW.⁴⁷ • Trust for London's cost-of-living tracker notes that, for London households with the lowest incomes, the relative 	<p>Processes should be put in place to ease the cost of living; and reduce poverty and income inequality.</p>

³⁸ ONS, [Disability, England and Wales: Census 2021](#), January 2023

³⁹ ONS, [Disability, England and Wales: Census 2021](#), January 2023

⁴⁰ Joseph Rowntree Foundation, [Special educational needs and their links to poverty](#), February 2016

⁴¹ DfE: Explore education statistics, [Special educational needs in England](#), June 2024

⁴² ONS, Socio-economic Classification, 2023

⁴³ MHCLG, ID – Employment deprivation, 2019

⁴⁴ LG Inform, Proportion of children aged 0–15 in relative low-income families in England, 2023

⁴⁵ LG Inform, Proportion of children aged 0–15 in relative low-income families in England, 2023.

⁴⁶ London Datastore, [Poverty in London 2021/22](#), March 2023

⁴⁷ GLA, [State of London Report](#), June 2024

<p>cost of goods and services is expected to rise by 24 per cent, compared to the three years leading up to March 2020.⁴⁸</p> <ul style="list-style-type: none"> • Food prices are generally higher in London than in the rest of the UK. • Income inequalities are much starker in London than in the rest of the UK, with the richest tenth of Londoners having almost 9 times the income of the poorest tenth (twice the ratio for the rest of the UK).⁴⁹ • Within London, income deprivation affecting children is highest in the capital's central eastern boroughs.⁵⁰ 	
Education/attainment	
<ul style="list-style-type: none"> • There are 1,856 state-funded primary schools in London, including 512 religious character schools.⁵¹ • London has 160 state-funded special schools.⁵² • School absence is greatest in Newham and Tower Hamlets; and lowest in Richmond upon Thames.⁵³ • Nearly half of London residents obtained Level 4 as their highest qualification in 2021, higher than the national average.⁵⁴ • London is experiencing a decrease in demand for primary school places, with a predicted 7.6 per cent decrease in pupil numbers from 2022-23 to 2026-27.⁵⁵ • In England, children with SEND are six times more likely to be excluded than their peers who do not have SEND. 74 per cent of all permanently excluded pupils have some form of identified SEND.⁵⁶ 	<p>Explore the links between poverty and lower academic attainment.</p>
Child and family health and mental health and wellbeing	
<ul style="list-style-type: none"> • In London, the proportion of people who are not recorded as disabled is higher than the national average.⁵⁷ 	<ul style="list-style-type: none"> • GLA to work with boroughs and schools to promote and encourage sign-up to HSL awards

⁴⁸ Trust for London, [London's Cost of Living Tracker](#), 2023

⁴⁹ GLA, [State of London Report](#), June 2024

⁵⁰ LG Inform, Proportion of children aged 0–15 in relative low-income families in England, 2023

⁵¹ DfE, [Get Information about Schools](#), 2023-24 school year

⁵² DfE, [Get Information about Schools](#), 2023-24 school year

⁵³ DfE: Explore education statistics, [Pupil absence in schools in England](#), May 2022

⁵⁴ ONS, Highest level of qualification, 2021

⁵⁵ London Councils, Children and young people, 2023

⁵⁶ Joseph Rowntree Foundation, [Special educational needs and their links to poverty](#), February 2016

⁵⁷ ONS, Disability – age-standardised, 2021

<ul style="list-style-type: none"> • According to Census 2021, London residents generally have better self-reported general health than national levels.⁵⁸ • London has a higher prevalence of obese year 6 pupils than the national average.⁵⁹ • The latest data shows that, in London 34,454 pupils across all ages have social, emotional and mental health needs (2021-22 academic year).⁶⁰ • In 2020, 16-24-year-olds living in the most deprived areas of the UK experienced increases in psychological distress, 3.4 times larger than those in the least deprived areas.⁶¹ • Debt, food insecurity, fuel poverty, deprivation, and the isolation and uncertainty that is inextricably tied to these issues create an environment where poor mental health and wellbeing can flourish on a population-wide scale. • Mental health referrals within the NHS reached record levels of 4.3m in 2021, with 1.4m people still waiting to start treatment.⁶² • Children living around debt are five times more likely to be unhappy than children from wealthier families.⁶³ 	<p>and water-only policies.</p> <ul style="list-style-type: none"> • Borough UFSM contracts should ensure compliance with national school food standards.
Environment sustainability	
<ul style="list-style-type: none"> • 99 per cent of all primary and secondary schools in London exceed the World Health Organization (WHO) interim air quality guidelines for NO₂.⁶⁴ • 88 per cent of all educational establishments in London exceed the WHO interim air-quality guidelines for PM_{2.5}.⁶⁵ • Approximately 72g of food waste is produced per primary-school pupil per year across England.⁶⁶ • The main sources of food waste in primary schools can be attributed to the kitchen (i.e., food not served) and canteen (i.e. food served but not eaten) – with each producing approximately 36 per cent of food waste.⁶⁷ 	<ul style="list-style-type: none"> • Measures should be put in place to ensure that any increases in food delivery or food production do not exacerbate existing air quality issues for school children. • Measures should be put in place to ensure that the policy minimises any increases in food and

⁵⁸ ONS, Census 2021, General Health – age-standardised, 2022

⁵⁹ Department for Health, Prevalence of Childhood Obesity, Borough, Ward and MSOA, 2021

⁶⁰ Fingertips/Office for Health Improvement & Disparities, Child Health Profile, March 2023

⁶¹ National Library of Medicine, Time trend analysis of social inequalities in psychological distress among young adults before and during the pandemic: evidence from the UK Household Longitudinal Study COVID-19 waves, October 2021

⁶² The BMJ, England saw record 4.3 million referrals to mental health services in 2021, March 2022

⁶³ The Children's Society, What are the effects of child poverty?

⁶⁴ GLA, London Atmospheric Emissions Inventory (LAEI) 2019

⁶⁵ GLA, London Atmospheric Emissions Inventory (LAEI) 2019

⁶⁶ WRAP, Food waste in schools, January 2011

⁶⁷ WRAP, Food waste in schools, January 2011

<ul style="list-style-type: none"> • New legislation on food packaging came into force earlier in 2024, and encourages 'small producers to collect data' on packaging. This includes the government ban on single-use plastics and the extended producer responsibility scheme.⁶⁸ 	packaging waste in its production, manufacture, supply and preparation.
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⁶⁸ Defra, Extended producer responsibility for packaging: who is affected and what to do, June 2022 (updated May 2024)

Stakeholder engagement and consultation

Stakeholder engagement is a key part of an IIA methodology, and of policymaking more generally within the GLA. The views of stakeholders have informed the scope of the IIA, and the interim and final assessments comprising the IIA and its refresh.

Engagement prior to the 2023-24 policy launch

Prior to the first iteration of the IIA, GLA officers consulted with London boroughs; London Councils; other cities and countries offering or developing a UFSM offer; caterers and state-funded primary schools. Their views on the UFSM policy helped officers to understand any potential barriers to take-up; and to explore practical interventions to address these barriers. This consultation took place through webinars, meetings, surveys, steering bodies and advisory groups set up by the GLA, as well as one-to-one conversations with representatives of London boroughs and school leaders. The survey received responses from 27 out of 33 boroughs. The UFSM team conducted a series of interviews and small group discussions with schools – including those from outer and inner boroughs, academies and LA-maintained schools – and ensured a range of school sizes. In addition, the consultation phase informed key documents and policies such as the UFSM grant agreement. This was also underpinned by an evidence review.

To inform the first iteration of the IIA, an initial scoping exercise was undertaken. This formed the basis of an initial assessment, with high-level interim findings. This initial assessment explored the potential issues and sensitivities around implementing the UFSM policy for protected characteristics. It was conducted through a policy review and baseline profiling work. These interim findings were then used to inform an online stakeholder workshop, held in June 2023.

Representatives of over 100 stakeholder organisations were invited to attend the online stakeholder engagement workshop. Approximately 25 of these expressed an interest in the policy and the workshop; 22 accepted the invitation, and 17 attended.

Following the workshop, an online survey was circulated to all invited stakeholders, including workshop attendees, to capture any further views on the UFSM policy. They were also given the option to provide their views via a dedicated UFSM email address. Three stakeholders responded with their views. The GLA also undertook follow-up interviews with eight stakeholder organisations representing faith groups in London. These interviews explored the potential impacts of the UFSM policy on faith groups, as these impacts had been highlighted earlier in the stakeholder-engagement process. The range of stakeholders included in this engagement is set out in **Annex E**.

The engagement ahead of the policy launch took place between February and July 2023, via the online surveys, workshops, online webinars and telephone interviews. The themes raised informed both the EqIA (published on 11 July 2023) and the final IIA report (published in November 2023).

Engagement during the first year of the scheme

Throughout the first year of the policy implementation, the GLA has undertaken ongoing engagement and research with key stakeholders – scheme deliverers and recipients alike. This has included termly review meetings with all 33 boroughs; in-depth termly interviews with 30 headteachers; two online communities comprising 40 parents, and their children; and termly opinion polling of around 300 parents. In building an understanding of other

schemes and impacts, the UFSM team has continued to engage experts from the school food and health sectors; academics; researchers; and representatives from other cities. This academic year, the UFSM evaluation partners have undertaken surveys with boroughs and schools; and deep-dive case studies in over 25 schools. The GLA works closely with the evaluation partners via a Working Group to share learnings and guide the policy.

During the first year of the policy's rollout, the UFSM team has shared policy updates and best practice via webinar sessions. These have focused on operational matters for schools, including pupil premium, procurement and supporting infrastructure (for example, kitchens). The GLA has been working with the boroughs that had schemes before 2023, to understand their delivery process and share best practice with others. The GLA has established several steering bodies and advisory groups to ensure a user-centred approach to strategy and operational delivery. This in turn ensures that boroughs, schools and the GLA have had an opportunity to jointly identify and discuss issues during the lead-up to the scheme and its roll-out. These groups include: the Partnership Advisory Group, task-and-finish groups (Evaluation and Monitoring, Schools and Grant Management), and a UFSM Delivery Group.

Ongoing engagement remains a priority for the GLA and this continues to take place in various ways, including:

- regular written updates
- task-and-finish groups
- roundtables
- regular 1-1 meetings with all boroughs
- meetings with Headteachers
- meetings with London Councils
- meetings with the London Food Board
- Partnership Advisory Group⁶⁹
- insight work is also included as part of the monitoring and evaluation work funded and delivered by external partners
- informal borough intelligence gathering, including via a survey
- in-depth interviews with schools
- consultation to inform the EqIA
- public polling and insights work

⁶⁹ The Partnership Advisory Group provides guidance and expert input into the development and implementation of the UFSM policy. Members include representatives (senior officers – for example, Directors of Education) from each of the 33 boroughs across London.

- knowledge sharing with boroughs/schools via webinars
- resource sharing on webpages
- one-to-one meetings with nominated borough leads
- discussions at existing borough forums – such as the network of leads from the Association of Directors of Public Health, etc.

Assessment of the UFSM policy

The following section sets out the overall assessment of the policy and its anticipated impact against key focus areas (equalities, economics, health and environment). It takes into account the evidence set out in this document (and the EqIA and Supplementary Analysis) and has been informed by the updated rapid evidence review (**Annex A**).

The assessment has been developed using the guiding questions set out in the framework, best practice and relevant evidence. These resources have enabled the GLA to understand whether the policy supports or conflicts with the IIA framework objectives; and the potential impacts on the focus areas as a result of the policy intervention. In all cases, the identified effects encompass those that are direct or indirect, permanent or temporary. Given that the policy has not materially changed since the first year, most impacts are likely to be akin to the those identified in the first IIA. However, the longer time frame of two academic years will inevitably lead to more embedded practice, thus longer-term (or new) impacts may arise.

Key to IIA scoring:

+	The policy supports the IIA framework objective
O	The policy neither supports nor conflicts with the IIA framework objective
-	The policy conflicts with the IIA framework objective
N/A	The policy is not relevant to the IIA framework objective
?	There is insufficient information to reliably assess

The assessment describes where objectives are complementary or potentially conflicting, or where there might be uncertainty about likely effects. All objectives within the framework carry an equal weighting.

Where the assessment identifies likely adverse effects, measures have been identified that could be implemented to avoid or reduce this effect for consideration.

Assessment outcomes – equality impacts

IIA topic and objectives	Guiding questions	Score
Population and equality Enhance equality and social inclusion.	Does the policy ensure that nutritious food is provided, and it meets the dietary needs of all cultures, religions and ethnicities in London?	+
	Does the policy help to reduce stigma around receipt of FSM?	+
	Does the policy ensure no reduction in FSM uptake and pupil premium registration by those that meet the current government criteria for FSM?	+
	Does the policy support the most vulnerable in society?	+
	Does the policy enable those whose families are currently undocumented, due to their immigration status, and/or with NRPF, to benefit from FSM?	+

Equality impacts – key factors underpinning scoring outcomes

- As the offer is universal, there will be less stigma surrounding children claiming the government offer for FSM.
- Following completion of the year-one EqIA, a contingency funding pot was set aside to support specific access requirements for some groups of children, in certain extraordinary and specific circumstances, in relation to the Mayor's UFSM programme. It has been used to address unforeseen implementation issues for schools and boroughs that may inhibit their participation in the policy. This is open to all LAs in London based on evidence of need. Specifically, the funding must be used to support:
 - needs that may impede take-up for individuals with protected characteristics identified through the programme – such as those related to dietary requirements linked to specific faith needs
 - access requirements in boroughs, including specific needs related to protected characteristics, such as pupils with SEND.
- It is expected that year two of the policy will incur far fewer implementation issues than year one, as these have largely been resolved. However, it is important to continue monitoring this point, to keep abreast of any potential new challenges for schools.
- The UFSM grant principles commit to ensuring that food is culturally appropriate in line with the national school food standards.
- Throughout the programme, monitoring of UFSM uptake by ethnic and religious group is used to provide useful information on whether school food provision is meeting dietary needs for children with different beliefs.

- Schools receive pupil premium funding for children who qualify for FSM. This is estimated at £1,480 per year for every child registered.
- In May 2024, pupil-premium application analysis showed no significant shift in the city average this academic year, following introduction of the UFSM scheme. However, there are some fluctuations at borough level: 15 boroughs saw an increase in pupil-premium applications, and 18 saw a decrease.⁷⁰
- In March 2025 transitional protection will end. This means that pupils who were eligible on 1 April 2018, or who became eligible since then, continue to receive free meals, even if their household is no longer eligible under the benefits/low-earnings criteria, up until March 2025. . After March 2025, any existing claimants that no longer meet the eligibility criteria at that point (because they are earning above the threshold or are no longer a recipient of Universal Credit) will continue to receive FSM until the end of their current phase of education (i.e., primary or secondary). However, those who applied for FSM on or after 1 April 2018, are in receipt of universal credit and have earnings above the earned-income threshold will no longer be eligible for FSM from March 2025. The implication is that, once transitional protection ends, many families will need to reapply for pupil premium when they would not otherwise have done so. Failure to do so could impact school budgets.
- The GLA is taking a proactive role in helping boroughs inform schools about this change. The GLA will also continue to monitor uptake of pupil-premium applications. This includes uptake of national FSM since the policy has been implemented.
- In the last year, there has been a burgeoning uptake of pupil premium auto-enrolment initiatives by a handful of boroughs. This process effectively removes the barrier for families to apply for pupil premium, and automatically enrolls them for pupil premium if they are eligible. Through this, boroughs have identified several additional families as eligible for pupil premium, who were otherwise not enrolled or benefitting from pupil premium.
- To ensure schools continue to receive funding for pupil premium, and registrations do not decrease through receipt of the Mayor's UFSM, the GLA is offering support to boroughs. This includes running good-practice sessions with boroughs already offering UFSM, with draft letters sent to families explaining this clearly. Boroughs should also consider promoting UFSM registration to all pupils, to ensure that all those eligible for pupil premium are still picked up. Further support will also be offered to boroughs in year two to support their efforts on auto-enrolment.
- Historically, families who were undocumented due to their immigration status, and/or who had NRPF were not entitled to FSM under the eligibility criteria. However, a scheme to make FSM available to these families was introduced in the context of COVID-19. In January 2023, this scheme was made permanent.
- Across all communications, information about UFSM to parents/families who do not have English as their primary language are translated to ensure accessibility.

⁷⁰ Education and Skills Funding Agency, Pupil premium: allocations and conditions of grant 2024 to 2025, February 2024 (updated June 2024)

Assessment outcomes – economic impacts

IIA topic and objectives	Guiding questions	Score
Socioeconomic inequalities Reduce financial pressures on households; and help to alleviate the cost-of-living crisis.	Does the policy result in a reduction in the proportion of household income spent on food?	+
	Does the policy ensure sufficient food in both quality and quantity, so that it is not necessary for households to provide extra food for lunches?	?
	Does UFSM increase overall take-up of school meals for pupils across all income quintiles?	+
Wider economic impacts Provide wider economic benefits for households and businesses.	Can schools cope with the expansion requirements of the policy?	?
	Does the UFSM policy produce additional beneficial impacts on London's businesses?	+
	Does the UFSM policy produce additional beneficial impacts on London's economy?	+

Economic impacts – key factors underpinning scoring outcomes

- The IIA assessment concludes that UFSM will bring significant financial relief for households who currently: do not meet FSM thresholds; and either pay for a school meal, or provide their child or children with a packed lunch. Estimates from the economic assessment undertaken as part of this updated analysis suggest that those households could save upwards of £500 per KS2 child. This would have positive effects for families experiencing food insecurity as a result of the cost-of-living crisis.
- The policy is a universal offer, not targeted at any income quintile. Data from the boroughs already offering UFSM showed an increase in overall take-up of school meals, rather than a decrease. Additionally, GLA monitoring of FSM uptake – in partnership with management information systems provider Arbor – indicated average uptake figures exceeding 85 per cent amongst pupils eligible for the Mayor's scheme.⁷¹
- The overarching aim of the policy is to support families with the cost of living. As a result, the economic impact of the policy on families will be a key consideration of the policy evaluation. Understanding take-up of school meals for pupils across all income quintiles has also been built into the policy's monitoring and evaluation strategy. The full data for the academic year will be available towards the end of 2024, so will be included in the next refresh of this document.
- Regular engagement with schools and boroughs through development and implementation of the policy is set out in this paper (above). This has been done through a range of mediums such as surveys, webinars and meetings. Lessons from boroughs and schools that already provide UFSM have been shared, and are available via the [GLA borough/school resource hub](#).

⁷¹ Arbor data.

- The policy has built in flexibility for schools to offer cold lunches where significant challenges are faced with kitchen facilities. Additional support has been offered to schools where old kitchen equipment is failing under the pressure of offering UFSM. The grant conditions specify that the GLA must be notified if any school chooses to opt out of delivering the policy.
- A contingency fund was established by the GLA to support any school experiencing significant implementation barriers in year one.
- The UFSM policy is anticipated to produce additional benefits for London's businesses and the wider London economy. The additional investment in school food will have a positive impact on caterers. The five boroughs in London already offering UFSM will have the opportunity to reinvest the funding to support families affected by the cost-of-living crisis.
- In some boroughs, the additional investment will result in increased workforce requirements. It will thus have a positive impact on local employment.
- A November 2023 report by PwC, commissioned by Impact on Urban Health (IoUH), investigated the expansion of FSM across primary and secondary schools in London and England.⁷² The report looked at on the wider contribution stimulated by supply-chain activities from expanding FSM, and focuses on 2024-30.
- The report put the estimated impact of gross value added (GVA) for UFSM provision in 2024-30 at £13.9bn in England and £2.1bn in London. In both instances, the majority of the wider GVA generated through expanding UFSM provision comes from supply-chain activities, mostly contributed by the food and beverage sector.
- It estimates that by 2030 there will be an additional 40k full-time equivalent (FTE) jobs in England, and 5.2k in London. In both cases, the majority of the wider FTE jobs supported through expanding UFSM provision is from the food and beverage and wholesale trade sectors.
- The UFSM policy price per meal has been uplifted in year two of the policy to reflect feedback on implementation from schools and boroughs in Year One.
- In March 2024, the OBR put food inflation projections for 2024-25 at 2.1 per cent.⁷³ To support UFSM delivery for the 2024-25 school year, the grant allocation per meal has been increased from £2.65 to £3.00. This goes beyond the food cost projections for March 2024 developed by the OBR.
- Latest research continues to show the success of UFSM schemes in alleviating household financial hardship and reducing food insecurity. A study by the ISER reported household savings of £41 every four weeks.⁷⁴ Another report highlighted reduced financial hardship and stress for families.⁷⁵ A 2023 article from BMC Public Health looks at a UFSM pilot scheme in two secondary schools in London. An evaluation of the pilot found that it increased access to a healthy meal, reduced

⁷² IoUH, An Economic Contribution Analysis of Free School Meal Provision Expansion, November 2023

⁷³ OBR, Economic and fiscal outlook, November 2023

⁷⁴ ISER, The impacts of Universal Free School Meal schemes in England, February 2024

⁷⁵ Health Promotion International, Health, wellbeing and nutritional impacts after 2 years of free school meals in New Zealand, August 2023

food insecurity, improved nutrition, and generated some social benefits.⁷⁶ Additional evidence from the Institute for Fiscal Studies suggests a meal price of £2.87 would be in line with inflation.⁷⁷

- Analysis of data from the boroughs with a previous UFSM offer shows a reduction of £11.53 on supermarket food expenditure and £9.46 on eating out (Holford and Rabe, 2024). This suggests a shift of expenditure to non-food items.
- UFSM is playing an important role in alleviating school lunch debt (CPAG and Reconnect London, 2024).

Assessment outcomes – health impacts

IIA topic and objectives	Guiding questions	Score
Health and wellbeing Improve access to healthy food and reduce health inequalities.	Does the policy reduce inequalities in access to healthy food and reduce health inequalities?	+
	Does the policy promote consistency in standards of food quality/provision across the LBs?	+
	Does the policy create an environment that promotes healthy eating habits in children?	+
	Does the policy help to provide long-term physical health benefits for children, including a reduction in obesity levels?	+
	Does the policy promote good mental health and wellbeing in children by supporting a range of health determinants – such as access to healthy food, social participation, interaction and support, and high-quality diet and nutrition?	+
	Does the policy promote good mental health and wellbeing in parents and carers by supporting a range of health determinants such as access to healthy food, social participation, interaction and support, and high-quality diet and nutrition?	+
Social cohesion and inclusive design Improve social cohesion and inclusion and reduce health inequalities and stigma.	Does the policy improve social cohesion and inclusive access to a good standard of food for all children in primary schools?	+
	Does the policy reduce health inequalities and stigma?	+
Education and skills	Does the policy help improve school attendance?	0

⁷⁶ BMC Public Health, A qualitative process evaluation of universal free school meal provision in two London secondary schools, February 2023

⁷⁷ Institute for Fiscal Studies, The policy menu for school lunches: options and trade-offs in expanding free school meals in England, March 2023

IIA topic and objectives	Guiding questions	Score
Improve educational attendance and attainment.		
	Does the policy help to improve educational attainment?	+

Health impacts – key factors underpinning scoring outcomes

- It is expected that the universal offer provided through the policy will improve social cohesion and inclusion and tackle health inequalities.
- Through grant conditions attached to LA funding of the policy, boroughs are requested to adhere to national school food standards. To aid this, the price per meal has been increased Year Two to support the provision of nutritious meals and to account for feedback on implementation from schools and boroughs in year one.
- Offering school meals will have a positive impact on poverty and its bidirectional relationship to the mental health of children and families.
- There is not enough evidence to show a direct correlation to impacts on school attendance. However, evidence shows that children who are well fed can focus better in lessons, and consequently have better educational attainment.
- On pupil health, new evidence from the ISER,⁷⁸ CPAG and the National Education Union (NEU)⁷⁹ shows that FSM can have a positive effect on child obesity rates, eating habits, home-school relationships and uptake amongst pupils eligible for the government's FSM. As the London UFSM scheme continues into a second year, an evaluation could consider exploring such impacts further.

Assessment outcomes – environmental impacts

IIA topic and objectives	Guiding questions	Score
Air quality Avoid adverse impacts on air quality and remain aligned with relevant London policies.	Does the policy result in significant changes to air quality?	?
Climate change and greenhouse gas emissions Tackle climate change impacts through reducing greenhouse gas emissions and remain aligned with relevant London policies.	Does the policy result in significant changes to the number of delivery vehicles on the road (with potential implications for traffic related emissions)?	?
	Does the policy result in significant changes to emissions through production, manufacture and preparation of food?	?
Waste	Does the policy reduce the use of single-use plastics in food packaging?	?

⁷⁸ ISER, [The impacts of Universal Free School Meal schemes in England](#), February 2024

⁷⁹ CPAG, [The universalism multiplier](#), December 2023

IIA topic and objectives	Guiding questions	Score
Maximise efficient and sustainable use and disposal of food packaging and waste.	Does the policy include provision for recycling of food packaging?	?
	Does the policy result in any changes to the overall volumes of food waste including through production, manufacture and preparation of food?	?

Environmental impacts – key factors underpinning scoring outcomes

- It is unknown whether increased deliveries to schools will have a negative impact on air quality. This is because boroughs that were involved in the IIA workshops highlighted that larger deliveries are more likely than an increased volume of deliveries. This should be monitored as part of the policy evaluation.
- Neither the baseline data on which the IIA was developed, nor the UFSM policy itself, have materially shifted in the context of the scheme extension.
- The recent government ban on single-use plastics and the Extended Producer Responsibility scheme has implications for manufacturing and school caterers.⁸⁰
- Given the diversity of local catering provision, it is also unknown whether there will be changes to emissions through production, manufacture or preparation of food. It is likely that any implications would also occur outside London.
- The contracts with caterers are held by local boroughs, not the GLA. Therefore, catering arrangements cannot be directly assessed against the GLA policy.
- Approximately 72g of food waste is produced per primary-school pupil, per year, across England. Accordingly, this assessment has found the potential for increased waste from uneaten food as a result of UFSM.
- However, this is the first policy of its kind to be delivered at such scale – the degree and scale of additional food waste at this stage remains unknown, but will be explored further with the boroughs.

Summary findings and recommendations

This IIA assessment considers the likely effects of the UFSM scheme (including positive and adverse impacts) against three core strands:

- London's people (incorporating the HIA and EqIA)
- London's economy (incorporating the EcIA)
- London's environment (incorporating the SEA).

⁸⁰ Defra, Consistency in household and business recycling in England: Government response to consultation outcome, 21 November 2023

In order to develop these assessments, this report has drawn upon, cross-referenced and updated various sources including legislation and guidance; policy considerations specific to the UFSM scheme (e.g. pupil premium; universal provision); and baseline data including demographic statistics.

On the impacts of UFSM proper, the overall conclusion from this IIA and accompanying EqIA is that the scheme is likely to result in many positive effects – particularly in terms of reducing the financial impacts of the cost-of-living crisis for the most vulnerable Londoners.

London's poverty rates have consistently been amongst the UK's highest for the last two decades. It also has England's highest proportion of children who are in poverty, but do not receive FSM. As the Mayor's FSM offer is universal, regardless of household income, this year's extension will continue to allow many Londoners living in poverty – but who do not meet national government's prescriptive eligibility criteria – to benefit from the scheme, thereby reducing financial pressures on households. Recent estimates from year one of the UFSM scheme suggest that households could save up to £1,000 per child over two years.

The scheme will have positive effects on the health and wellbeing of the children and their wider families. GLA's year-one monitoring suggest that children enjoy UFSM for the sense of equality that comes with sitting down to the same meal; and families experience less stress from financial pressures.

Similarly, recent research from the NEU and CPAG found that the shared experience of universal provision fosters a sense of togetherness, and reduces feelings of exclusion.

However, this IIA acknowledges the likelihood that some aspects of the proposed policy will yield insufficient information to reliably assess either the impact of the scheme, or the potential for improvements.

Where impacts remain unknown, there is also an opportunity for the GLA to work closely with partners to address these. There could be work with boroughs, schools and sector partners who are active in this space to explore opportunities to connect UFSM with sustainable procurement and objectives.

Finally, longer-term policy and delivery considerations have been outlined. While these considerations will be particularly useful for future iterations of the Mayor's scheme – particularly in light of the commitment to make UFSM permanent – it is hoped they will also serve as valuable learnings for partners and the wider policy space proper.

Summary by assessment

EqIA

As mentioned, the IIA process involved a thorough EqIA process that considered the potential for each action to result in disproportionate or differential equality effects. The assessment also recognises the impacts of intersectional inequalities such as disability and ethnicity, which also intersect with socioeconomic status and other protected characteristics, to form multiple layers of disadvantage.

Following completion of the EqIA, a contingency funding pot was set aside to support specific access requirements for some groups of children. In certain extraordinary and specific circumstances this was used across many boroughs in year one.

The key findings are as follows:⁸¹

- **Age:** Positive impacts on children aged 7-11 who will now benefit from FSM; and the benefits for nutrition, mental health and wellbeing, as well as the academic learning and attainment, that these will bring.
- **Disability:** FSM will be available to more children (i.e., those in Years 3-6) in state-schools, a proportion of which will be children with disabilities.
- **Sex:** 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.
- **Sexual orientation and gender reassignment:** LGBTQ+ parents or guardians, who are more likely to be economically constrained than heterosexual parents or guardians, may benefit from the financial relief provided by this proposed policy.
- **Socio-economic status:** Reduced stigma around receipt of FSM, as all children can partake; and improved attendance. The data shows a correlation between levels of income deprivation within an LA area and school attendance.
- **Race:** Universal provision removes a potential barrier to uptake of FSM. Currently, FSM requires completion of forms, which may hinder uptake for those not fluent in English. There is potential to reduce the stigma around receipt of FSM. The data indicates that pupils from Black, Asian and Minority Ethnic groups are more likely to both receive FSM and be living in poverty. The universal policy will therefore assist those already in receipt of FSM by reducing stigma – and ensure those living in poverty, but unable to claim government FSM due to prescriptive eligibility criteria, can access free meals.
- **Religion/belief:** UFSM will be available to all state-funded primary schools, including faith schools. A top-up price per meal continues to be paid to Jewish state-funded primary schools to support the higher price per meal for kosher food.
- Additional groups, such as those with caring responsibilities and lone parents, may disproportionately benefit from the financial relief provided by this proposed policy.

To review the full EqIA see **Annex B**.

The following table sets out the assessments of the UFSM scheme against three core strands: London's people (incorporating the HIA and EqIA); London's economy (incorporating the EcIA); and London's environment (incorporating the SEA). It also identifies mitigation and/or enhancement measures that are either in place or recommended for consideration.

⁸¹ To review the full EqIA and baseline data on protected characteristics, see Annex B.

London's people (incorporating the HIA and EqIA)

Policy topic	Original policy assessment	Implications for policy extension	Updated recommendations for policy extension
What are the projected impacts of UFSM on stigma and social inclusion?	<p>Universal provision should reduce the stigma around receipt of FSM – children will no longer be identified as coming from poorer families.</p> <p>FSM is found to be higher amongst ethnic minority groups.⁸² UFSM should bring benefits for greater inclusion and reductions in social segregation.</p>	<p>Neither the UFSM policy, nor the baseline data against which the IIA was assessed, not materially shifted since publication of the IIA in autumn 2023.</p> <p>Early findings via GLA ongoing monitoring suggest that children enjoy UFSM for the sense of equality that comes with sitting down to the same meal. Recent research from the NEU and CPAG found that the shared experience of universal provision fosters a sense of togetherness, and reduces feelings of exclusion.⁸³</p>	<p>Monitor uptake of UFSM according to pupil demographics and government eligibility throughout the scheme extension.</p>
What impacts will UFSM have on access to the government FSM scheme?	<p>Those who may currently be eligible for government FSM, but are not taking it up, will automatically receive UFSM. This is expected to remove barriers to access for those who may find it harder to fill in the required forms (including those with lower levels of literacy and/or fluency in English), and those who are</p>	<p>The original findings of UFSM's impacts on access to government FSM have not materially shifted since publication of the IIA in autumn 2023.</p> <p>In addition to the original findings of the IIA assessment, recent research from ISER highlighted an increased uptake amongst pupils eligible for government FSM, who were previously not taking the</p>	<p>Continue to work with boroughs to offer schools and parents guidance for completing forms in relation to pupil premium.</p> <p>Help to improve awareness, among boroughs and schools, of the strengthened government guidance on reasonable adjustments for pupils with SEND. This follows the former Schools Minister's</p>

⁸² DfE, *Schools, pupils and their characteristics*, January 2024

⁸³ CPAG, *The universalism multiplier*, December 2023

Policy topic	Original policy assessment	Implications for policy extension	Updated recommendations for policy extension
	<p>unaware of their rights.</p> <p>This would disproportionately include those from ethnic minority and/or migrant groups⁸⁴ as well as single-parent⁸⁵ and disabled households.⁸⁶ This has direct benefits for reducing health inequalities across different sectors of society and enabling access to healthy food.</p>	<p>government scheme, despite being eligible.⁸⁷</p>	<p>commitment, in January 2023, to update FSM guidance.</p> <p>Continue to support boroughs in establishing clear communications to schools on the ongoing need for registration with the government scheme.</p> <p>Continue to monitor uptake according to pupil profile – including whether they are eligible for the government FSM scheme.</p>
What will the impacts of UFSM be on pupil premium income for schools?	<p>The impact on pupil premium rates was originally unknown. There is potential for UFSM to increase uptake of the national offer via communication with parents.</p> <p>However, there is a risk that UFSM could reduce the number of sign-ups among those eligible for means-tested FSM – which could potentially impact on pupil premium. This could have potential repercussions for</p>	<p>The potential for positive and adverse impacts related to pupil premium remain the same for the scheme extension, which is similar in scope to year one.</p> <p>Analysis of pupil-premium applications in May 2024 highlighted there was no change at London level since the introduction of the mayor's scheme. However, boroughs experienced varying changes to pupil-</p>	<p>The GLA will convene boroughs to consider auto-enrolment, enabling all pupils to register for UFSM. Implementing auto-enrolment would ensure that all those eligible for pupil premium receive government financial support.</p> <p>The GLA will continue to work with partners to monitor uptake of pupil premium throughout the pilot year. This should include uptake of national FSM since</p>

⁸⁴ Trust for London, London's Poverty Profile, 2023

⁸⁵ ONS, Household composition, 2021

⁸⁶ DfE: Explore education statistics, Special educational needs in England, 2023

⁸⁷ ISER, The impacts of Universal Free School Meal schemes in England, February 2024

Policy topic	Original policy assessment	Implications for policy extension	Updated recommendations for policy extension
	<p>the school's financial resources.</p> <p>The grant principles for schools, as set out by the GLA state: <i>'Boroughs are asked to support approaches which continue to maximise pupil premium registration by eligible families. Information on good practice is available on the Mayor's online hubs for boroughs and schools.'</i></p>	<p>premium applications.⁸⁸</p> <p>The removal of transitional protections in 2025 may lead to a significant decrease in pupil applications.</p>	<p>the policy has been implemented.</p> <p>As part of their grant conditions, boroughs could be asked to support approaches that continue to maximise pupil-premium registration, by eligible families, for year two of the scheme.</p> <p>Continue to monitor the national government FSM and pupil-premium data, published annually.</p>
What are the step-down impacts associated with UFSM?	<p>The IIA found that there is a risk, linked to ending the scheme, that parents who are eligible for government FSM may not register in subsequent years due to not understanding the change back from universal to targeted provision of meals.</p>	<p>The scheme has been extended for another year, and the Mayor has made clear his intention to make UFSM permanent in London.</p> <p>Pupils' FSM eligibility is currently protected under government legislation. In March 2025, this will change.⁸⁹ Once the revised roll-out of universal credit has been completed (31 March 2025), any pupil losing their eligibility will remain protected until the end of their current phase of education (so Year 6</p>	<p>Continue to support boroughs in their adoption of auto-enrolment, to ensure eligible pupils are registered with the government FSM scheme.</p>

⁸⁸ Education and Skills Funding Agency, Pupil premium: allocations and conditions of grant 2024 to 2025, February 2024 (updated June 2024)

⁸⁹ DfE: Free school meals: guidance for schools and local authorities, March 2018 (updated 2024)

Policy topic	Original policy assessment	Implications for policy extension	Updated recommendations for policy extension
		for primary-school pupils). However, there will be a potential knock-on impact on pupil premium funding, as it is yet to be known what the new legislation will look like long term.	
What are the projected impacts of UFSM on families who do not meet the threshold for the government FSM scheme?	<p>Those living in relative poverty, but not currently qualifying for FSM, should be able to benefit from the financial relief provided by UFSM.</p> <p>This is particularly important in London where the cost of living is higher, in terms of both on-the-shelf food prices and other costs, such as rents.⁹⁰</p> <p>.</p>	<p>The UFSM policy and its wider framework (i.e., the ongoing cost-of-living crisis) have not materially shifted in the context of the scheme extension.</p> <p>It is not currently anticipated that the government will change its FSM eligibility criteria for the 2024-25 academic year. The benefits of universal provision are therefore expected to continue throughout the scheme extension. However, following the general election in July this could change.</p> <p>To date, ongoing GLA monitoring suggests that families who are taking up UFSM, but are not eligible for government FSM, experience positive cost saving and wellbeing impacts.</p>	The GLA will continue to monitor impacts on families according to social economic grade and household income, where possible.
What are the impacts of UFSM on pupil	There are many studies referencing the positive impacts of UFSM on pupil	The UFSM policy has not materially shifted in the context of the scheme extension.	The GLA is to consider evaluating the scheme's impact as part of the

⁹⁰ Trust for London, London's Poverty Profile, 2023

Policy topic	Original policy assessment	Implications for policy extension	Updated recommendations for policy extension
wellbeing and behaviour?	wellbeing, as identified in the Theory of Change Systematic Literature review for year one .	Therefore, so the benefits on pupil health and wellbeing are expected to continue. Recent research from CPAG and the NEU highlights improved nutrition for pupils; changed eating habits; improved home-school relationships; and better uptake amongst government eligible pupils. ⁹¹	monitoring and evaluation work for the policy.
What are the projected impacts of UFSM on wider household benefits?	UFSM should bring benefits for other children living in households with children who would qualify for FSM. They may benefit from increased money being available to spend on food and other necessities for other children within the household, including pre-schoolers and older siblings.	The UFSM policy has not materially shifted in the context of the scheme extension, and so the benefits on the wider household are expected to continue. To date, ongoing monitoring indicates cost savings of £15 per week (£60 per calendar month). This enables families to buy food to have at home; and/or make healthier, lighter and cheaper food choices in the evening.	The Theory of Change should be considered for the monitoring and evaluation of the policy.
Will the UFSM policy meet the dietary requirements of all faith groups?	UFSM grant principles stipulate that boroughs must ensure that food is culturally appropriate, in line with national school food standards. Ongoing stakeholder engagement and	The UFSM policy has not materially shifted in the context of the scheme extension, and so the projected impacts on dietary needs are expected to continue. Early insights of UFSM uptake by ethnic and religious group	Jewish state-schools will continue to receive an additional 85p uplift on the £3.00 price per meal in year two (£3.85 in total), in response to the ongoing higher cost of kosher meals. There could be consideration of how

⁹¹ CPAG, The universalism multiplier, December 2023

Policy topic	Original policy assessment	Implications for policy extension	Updated recommendations for policy extension
	<p>the EqlA showed that, while boroughs and schools currently support a range of needs, certain faith-related dietary requirements (i.e., kosher food) would incur additional costs.⁹²</p>	<p>suggests that school food provision is broadly meeting dietary needs for children with different beliefs. However, the programme will continue to capture insights on this, including where schools may be facing challenges in providing a halal offer.</p>	<p>to support schools and caterers to promote vegetarian and fish options, to suit a greater range of cultural/faith needs. However, this decision will be taken via local commissioning contracts and school policy.</p> <p>Work will continue to ensure that: guidance is available to boroughs on communicating to undocumented families; and information is available in different languages.</p> <p>Continue to monitor uptake of UFSM, by ethnic and religious group.</p>
<p>Is UFSM expected to improve health for those experiencing food insecurity?</p>	<p>UFSM should improve the health of those currently experiencing food insecurity by ensuring at least one nutritious meal a day. This would bring benefits for children's growth and development, and mental health and wellbeing.⁹³</p> <p>It is also anticipated that the scheme</p>	<p>The UFSM policy has not materially shifted in the context of the scheme extension, and so the projected impacts on health are expected to continue.</p> <p>To date, early insight suggests children receiving a full, nutritious meal at lunchtime diminishes the mental load on parents/carer. This not only positively impacts</p>	<p>The GLA will consider convening boroughs on food standards,</p> <p>Given the longer timeframe for the scheme, consideration could be given to the scheme's impact on wider health issues (such as healthy weight for children) and whether this could be incorporated into the monitoring</p>

⁹² GLA, UFSM Integrated Impact Assessment (IIA) and Equalities Impact Assessment (EqlA)

⁹³ Relationship between diet and mental health in children and adolescents: a systematic review. American Journal of Public Health, 104(10).

Policy topic	Original policy assessment	Implications for policy extension	Updated recommendations for policy extension
	would bring about positive mental health benefits for recipients and their families from reducing concerns about food insecurity. ⁹⁴	mental wellbeing but also reduces worries about meeting children's nutritional needs. A recent ISER study suggests a positive improvement on obesity levels amongst children. ⁹⁵	and evaluation strategy for year two.
Is the UFSM policy expected to meet food standards?	The grant principles and conditions for year one state that provision of school meals should meet national food standards; and should improve awareness of healthy eating and positive eating habits. These standards are set by national government.	As part of grant principles for year two , the scheme extension will continue to stipulate that UFSM provision should meet national food standards.	The GLA will consider opportunities to promote better education and engagement around nutrition and different food types. This would encourage all students to embrace healthy eating habits; and reduce unfamiliarity with produce, and therefore waste. This is in alignment with HSL awards. Although responsibility for meeting food standards sits with schools, the GLA will continue to monitor any trends or issue related to food quality should these arise.

⁹⁴ Cain, Kathryn S et al. "Association of Food Insecurity with Mental Health Outcomes in Parents and Children." Academic pediatrics vol. 22,7 (2022).

⁹⁵ ISER, The impacts of Universal Free School Meal schemes in England, February 2024

London's economy (incorporating the EcIA)

Policy topic	Original policy assessment	Implications for policy extension	Updated recommendations for policy extension
What are the projected impacts of UFSM on financial savings for London families?	UFSM should bring significant financial relief for households that currently: do not meet the government's FSM thresholds; and either pay for a school meal or provide their child or children with a packed lunch. ⁹⁶	Given food inflation projections, ⁹⁷ the policy extension will continue to have positive effects for families experiencing food insecurity or are unable to provide a healthy meal option for their children as a result of the cost-of-living crisis. Recent estimates suggest that households could save up to £1000 per child over two years.	Continue as a core focus for the monitoring and evaluation strategy.
What are the projected impacts of UFSM on London's wider economy?	The original grant principles stipulate boroughs and schools should take consideration of the LLW, which suggested positive impacts on those working in the catering system within schools. In some areas the enhanced offer should create new employment opportunities for local people.	Grant conditions for the scheme extension will continue to take consideration of the LLW into account. Moreover, new evidence corroborates the findings of the original IIA. According to modelling by IoUH and PwC, expanding FSM provision in London would stimulate strong economic benefits over time, including supporting over 5,000 FTE jobs in the city by 2030. ⁹⁸	Continue to monitor adherence to grant conditions and uptake of grant principles.

⁹⁶ CPAG, [By region: number of children in poverty not eligible for free school meals](#), 1 September 2022

⁹⁷ OBR, [Economic and fiscal outlook](#), November 2023

⁹⁸ IoUH, [An Economic Contribution Analysis of Free School Meal Provision Expansion](#), November 2023

Policy topic	Original policy assessment	Implications for policy extension	Updated recommendations for policy extension
		<p>Investing in UFS M is also likely to boost London's GVA (i.e. output) in the medium to long term. For example, the IoUH/PwC analysis reveals that expanding UFS M across London could generate an additional £2.1bn in output between 2024 and 2030.⁹⁹</p> <p>Most of the new jobs supported by UFS M expansion will be generated in the food and beverage industry (2,650 additional jobs, or 51 per cent of the total). 15 per cent of the remainder are expected to occur in the wholesale trade industry (750 additional jobs).¹⁰⁰</p>	
What are the projected impacts of UFS M on savings to the NHS?	UFS M provision should induce improved health and nutritional outcomes, which would in turn generate savings to the NHS and (more broadly) the Exchequer over time. ¹⁰¹	<p>In 2022, IoUH estimated that improved health outcomes from UFS M expansion would save the NHS £12m from reduced obesity. The cost savings are likely to be higher for 2024-25.</p> <p>Recent research highlights positive</p>	Consider evaluating how the scheme is contributing to a whole-system approach to supporting healthy weight for children in London, and subsequent improved health outcomes.

⁹⁹ IoUH, An Economic Contribution Analysis of Free School Meal Provision Expansion, November 2023

¹⁰⁰ IoUH, An Economic Contribution Analysis of Free School Meal Provision Expansion, November 2023

¹⁰¹ Food for Life, Summary of evidence in support of Universal Free School Meals

Policy topic	Original policy assessment	Implications for policy extension	Updated recommendations for policy extension
		impacts on obesity levels in children. ¹⁰²	
What are the projected impacts on improved lifetime earnings?	<p>Expanding UFSM is likely to lead to improved educational outcomes for children, which would (all other things being equal) enhance their potential lifetime earnings.</p> <p>In turn this would boost future consumer spending and London's overall GVA/output.</p>	<p>In 2022, IoUH estimated that UFSM expansion would increase the lifetime earnings of children by £18.5bn due to improved educational attainment.</p> <p>Recent research from ISER evidence an improvement in reading scores.¹⁰³</p>	Continue to support independent evaluations measuring learning outcomes.
What are the projected impacts as a result of inflation?	<p>Original concerns included whether schools may have to change menus (e.g. reduce options, provide more cold meals); reduce portion size; or use their own money to top up the meal price. However, the price per meal offered by the GLA in its first year was higher than the national government rate.</p> <p>As part of the UFSM policy development, an assessment across LBs</p>	<p>Evidence suggests there will be minimal negative impacts on implementation due to food inflation costs.</p> <p>These projections (from the November 2023 Autumn Statement) reveal that food price inflation is projected to be 2.03 per cent – lower than projections made for the 2023-24 school year. This is in line with broader lower inflation expectations by various agencies including the OBR itself and the Bank of England.</p>	<p>Any future funding considerations should take account of anticipated inflation costs and their impact on families' disposable incomes.</p> <p>Although responsibility for meeting food standards sits with schools, the GLA will continue to monitor any trends or issue related to food quality should these arise.</p>

¹⁰² ISER, [The impacts of Universal Free School Meal schemes in England](#), February 2024

¹⁰³ ISER, [The impacts of Universal Free School Meal schemes in England](#), February 2024

Policy topic	Original policy assessment	Implications for policy extension	Updated recommendations for policy extension
	indicated that a set price per meal was in line or above boroughs' set contract price points.	<p>For the 2024-25 school year, the grant allocation per meal has been increased from £2.65 to £3.00.</p> <p>The meal price increase goes beyond the food inflation projections developed most recently by the OBR for 2024-25.</p>	
What are the projected impacts on school capacity and infrastructure to roll out UFSM?	The lack of capital funding was a concern for some schools. Some may have developed solutions for a one-year policy that is not adequate for a two-year policy.	<p>The UFSM policy will not include capital funding as part of its extension. This may disproportionately impact schools in older and/or smaller buildings are not able to support the rollout of FSM all the time.</p> <p>Early engagement with schools and boroughs in year one has highlighted where schools are at particular risk of capital challenges, and we have been able to provide support as needed.</p> <p>Moreover, boroughs were funded based on 2022 census calculations which provided extra funding for the 2023/24 academic year. The GLA has also developed a programme to award kitchen equipment to</p>	<p>Continue to explore opportunities to facilitate capital donations to schools, by way of third-party support (this is already being implemented in the context of year one).</p> <p>The GLA is to consider, alongside boroughs, whether there could be a benefit in collaborative working to drive cost savings through contracting.</p> <p>Continue to monitor capacity and infrastructure-related challenges throughout year two.</p>

Policy topic	Original policy assessment	Implications for policy extension	Updated recommendations for policy extension
		<p>schools via application.</p> <p>Flexibility has been built into the grant principles for cold meal provision – this should facilitate the provision of UFSM for any school with kitchens that cannot cope with increased demand of hot meals.</p>	

London's environment (incorporating the SEA)

Policy topic	Original policy assessment	Implications for policy extension	Updated recommendations for policy extension
What are the projected impacts of UFSM on air quality?	<p>It is unknown whether increased deliveries to schools will have a negative impact on air quality. This is because boroughs that were involved in the IIA workshops highlighted that larger deliveries are more likely than an increased volume of deliveries.</p> <p>Given the diversity of local catering provision, it is also unknown whether there will be changes to emissions through production,</p>	The UFSM policy has not materially shifted in the context of the scheme extension – however measures could be taken to develop a better understanding of impacts in this area.	The GLA will continue to use its convening powers to understand and share best practice with boroughs and schools.

Policy topic	Original policy assessment	Implications for policy extension	Updated recommendations for policy extension
	manufacture and preparation of food. It is likely that any implications would also occur outside London.		
What will the impact of the UFSM policy be on waste, including food waste and single-use plastic?	<p>Approximately 72g of food waste is produced per primary-school pupil, per year, across England.¹⁰⁴</p> <p>Accordingly, the IIA found the potential for increased waste from uneaten food as a result of UFSM.</p>	<p>The baseline data on which the IIA was developed – and the UFSM policy itself – have not materially shifted in the context of the scheme extension.</p> <p>Recent research assessing the impact of a school lunch programme, highlighted low uptake created food waste.¹⁰⁵</p> <p>The recent government ban on single use plastics and the Extended Producer Responsibility scheme has implications for manufacturing and school caterers.¹⁰⁶</p>	<p>The London Borough Food Group could convene and share good practice including efficient ways to manage waste and order food.</p> <p>Work to explore sustainable procurement and managing waste could be undertaken with boroughs.</p>
What are the projected impacts of UFSM on climate change and greenhouse gas emissions?	The impacts of UFSM provision on changes to emissions through the production, manufacture and preparation of food are largely unknown.	Contracts with caterers and/or suppliers will continue to be held by the boroughs as part of the UFSM extension and cannot be directly assessed.	The London Borough Food Group could convene and share good practice, including efficient ways to reduce environmental impacts and manage waste.

¹⁰⁴ WRAP, Food waste in schools, 2011

¹⁰⁵ Health Promotion International, Health, wellbeing and nutritional impacts after 2 years of free school meals in New Zealand, August 2023

¹⁰⁶ Health Promotion International, Health, wellbeing and nutritional impacts after 2 years of free school meals in New Zealand, August 2023

Monitoring insight and impact

The overarching aim of the policy is to support families with the cost of living. Thus, the economic impact of the policy on families will remain a key consideration of the policy evaluation. Understanding take-up of FSM for pupils across all income quintiles will continue to be integral to the policy's monitoring and evaluation strategy.

The monitoring and evaluation strategy for year two should be driven by the Theory of Change, the latest emerging evidence from the literature, and the latest impacts that have emerged from year one. There should be a comprehensive review of the year one IIA, and whether data has emerged or is planned to be collected. This will inform subsequent monitoring and evaluation strategies.

Recommendations for monitoring

The impacts of the UFSM scheme will continue to be reviewed iteratively to: understand new challenges and/or opportunities as a result of the scheme; and ensure that, where possible, these are accounted for in policy delivery. As with year one the following themes should be embedded within the monitoring and evaluation strategy:

Theme	Monitoring requirements
Pupil level	Race Religion or belief SEND Parent/carers status, e.g., single-parent families Socio-economic grade
Borough level	Inner/outer London Diversity – race, religion or belief, Index of Multiple Deprivation
School level	Whether schools can cater for any future increases in food costs, particularly around halal meat and kosher food; and in schools where children from certain religion or beliefs may be in the minority
Equalities	Uptake of pupil premium Eligibility for government FSM Uptake of government FSM Food meets diverse dietary needs Impact on stigma associated with taking FSM Impact on attendance and educational attainment.
Economy	Impact on household income spent on food Impact on school resource – staffing and equipment Monitor schools that opt out due to limited capacity.
Health	Access to healthy food

	Impact on health inequalities Improved mental health relating to food security
Environment	Impact on food deliveries and potential impact on local air quality Impact on emissions linked to production, manufacturing and supply Impact on food waste and packaging, linked to production, manufacturing and supply Impact on energy use

Longer-term policy and implementation recommendations:

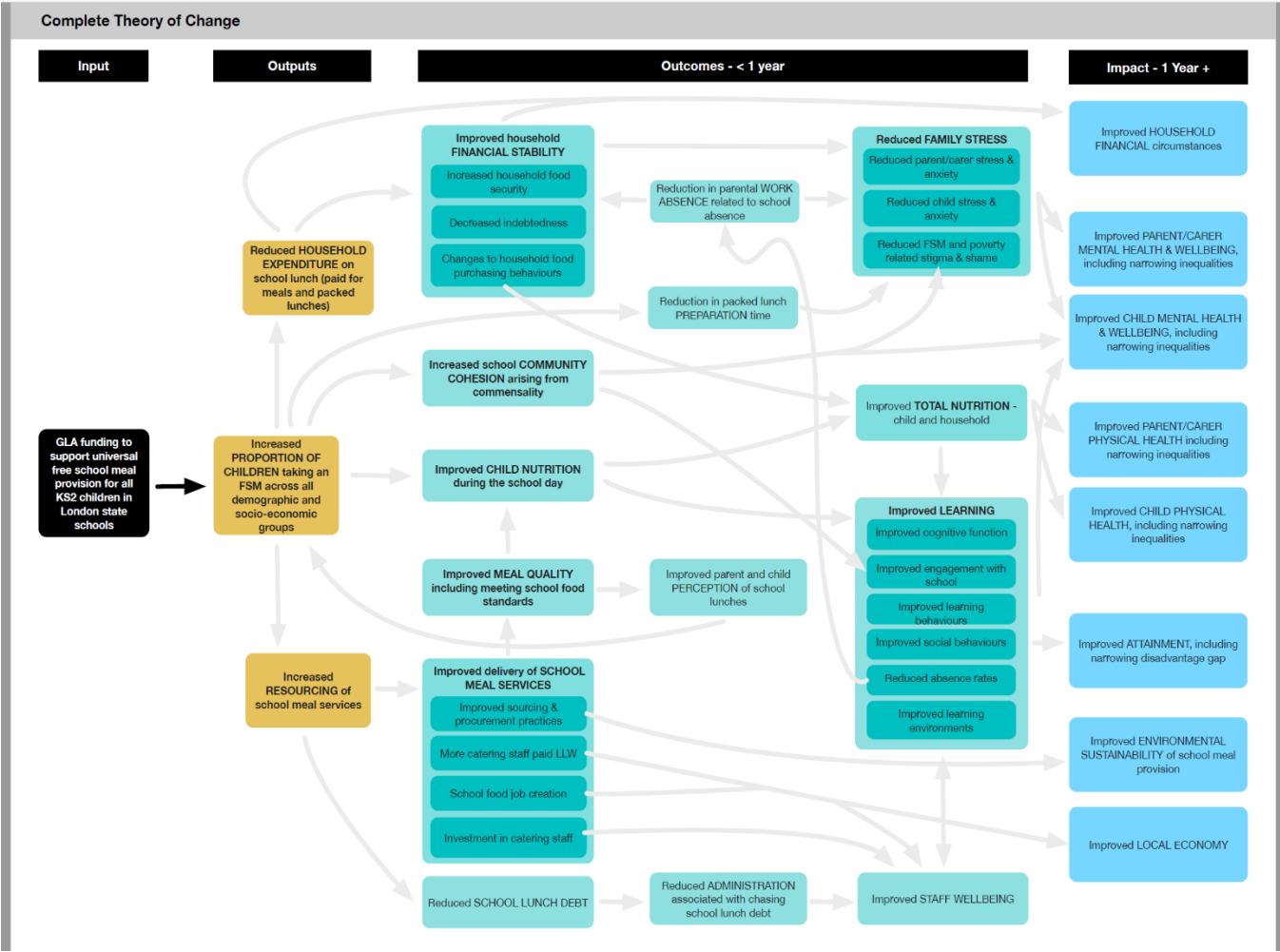
In considering any future iterations of the policy, the following recommendations could be taken into account:

- Learn from year-one monitoring and insights, including where boroughs/schools have a slow uptake rate; the impact of the scheme on pupils and families; and the impact of the scheme on schools, including staffing and resource. Continuing to draw on GLA insight gathered and independent evaluations.
- Continue to monitor policy implementation during year two via polling and qualitative research with schools, boroughs and families.
- Longer-term evaluation of the policy should consider the impact on reducing health inequalities. As such, there should be work to improve access to the scheme (particularly amongst pupils with protected characteristics) – such as commissioning further work to understand the food offered, and whether it is meeting all needs. This may involve developing the strategy for collecting uptake data, or commissioning studies to explore barriers to taking up the meals.
- Review the monitoring and evaluation strategy to include health measures, especially as the scheme extends and with a possibility of any further extension.
- The GLA could work with existing networks, including the London Borough Food Group, to share best practice relating to the environment and sustainability.
- The GLA could share good practice about how to encourage use of reusable or recyclable packaging/containers and avoid single-use plastic where possible.
- The GLA could encourage boroughs to consider opportunities in contracts to increase the number of vegetarian and fish options to suit a greater range of cultural/faith needs.

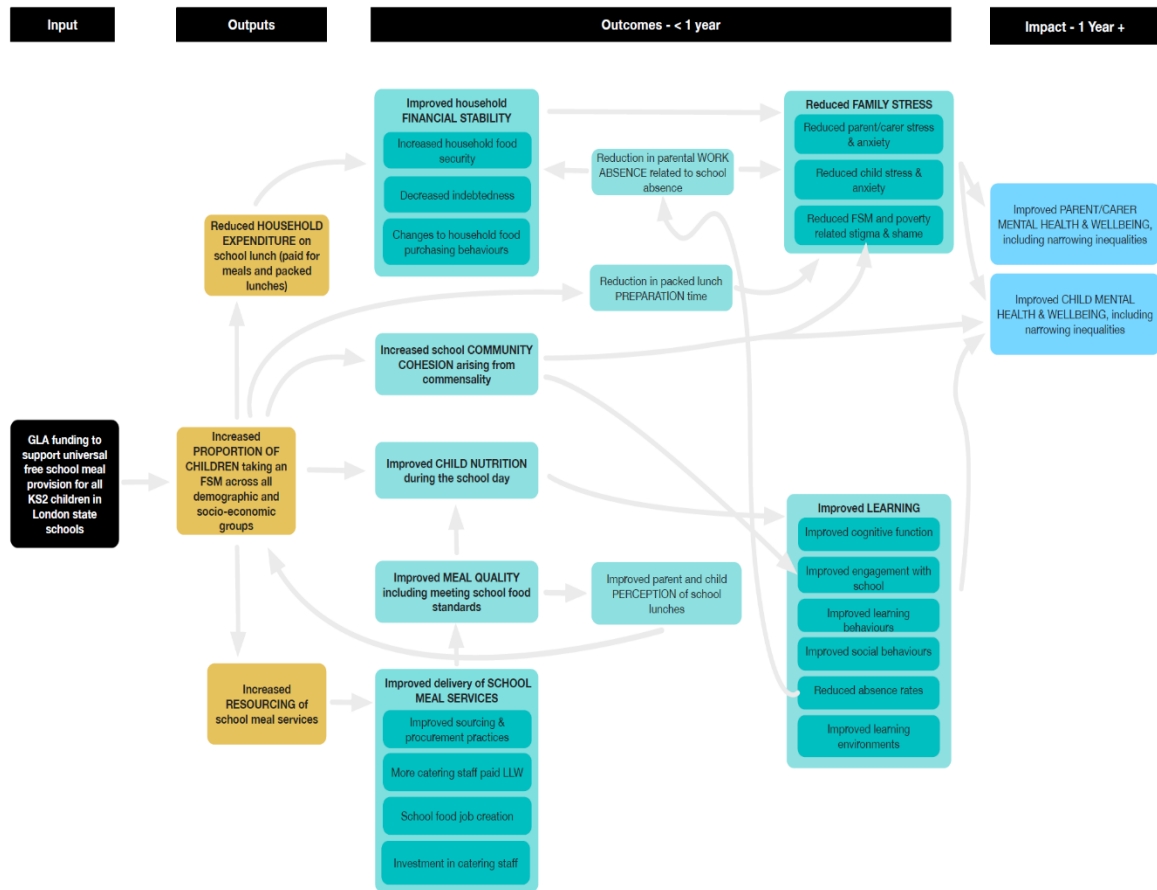
Annexes – UFSM IIA

- **Annex A** – Theory of Change
- **Annex B** – [UFSM Equality Impact Assessment \(FINAL\).docx](#)
- **Annex C** – [GLA Independent Schools Analysis 20230630 \(FINAL\).docx](#)
- **Annex D** – Policy review list
- **Annex E** – Stakeholder engagement
- **Annex F** – Glossary of abbreviations and terms
- **Annex G** – updated Literature Review

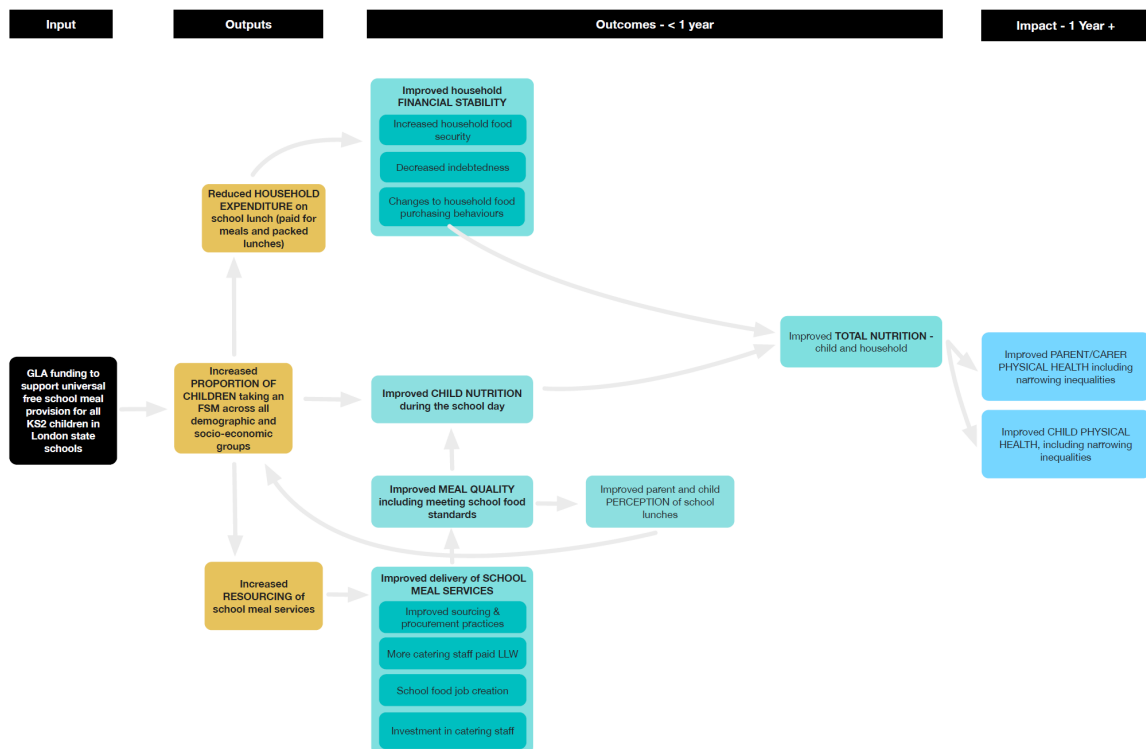
Annex A – Theory of Change

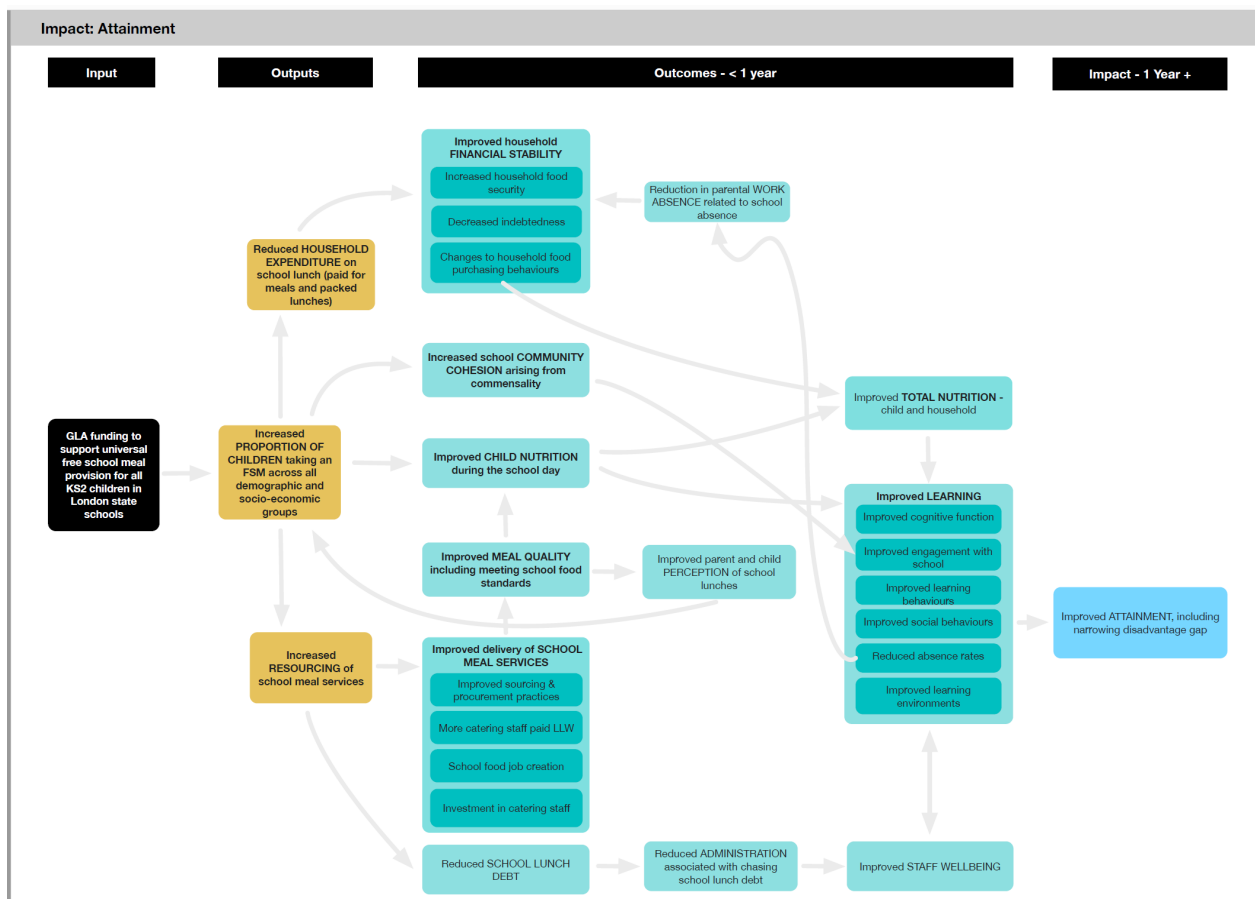


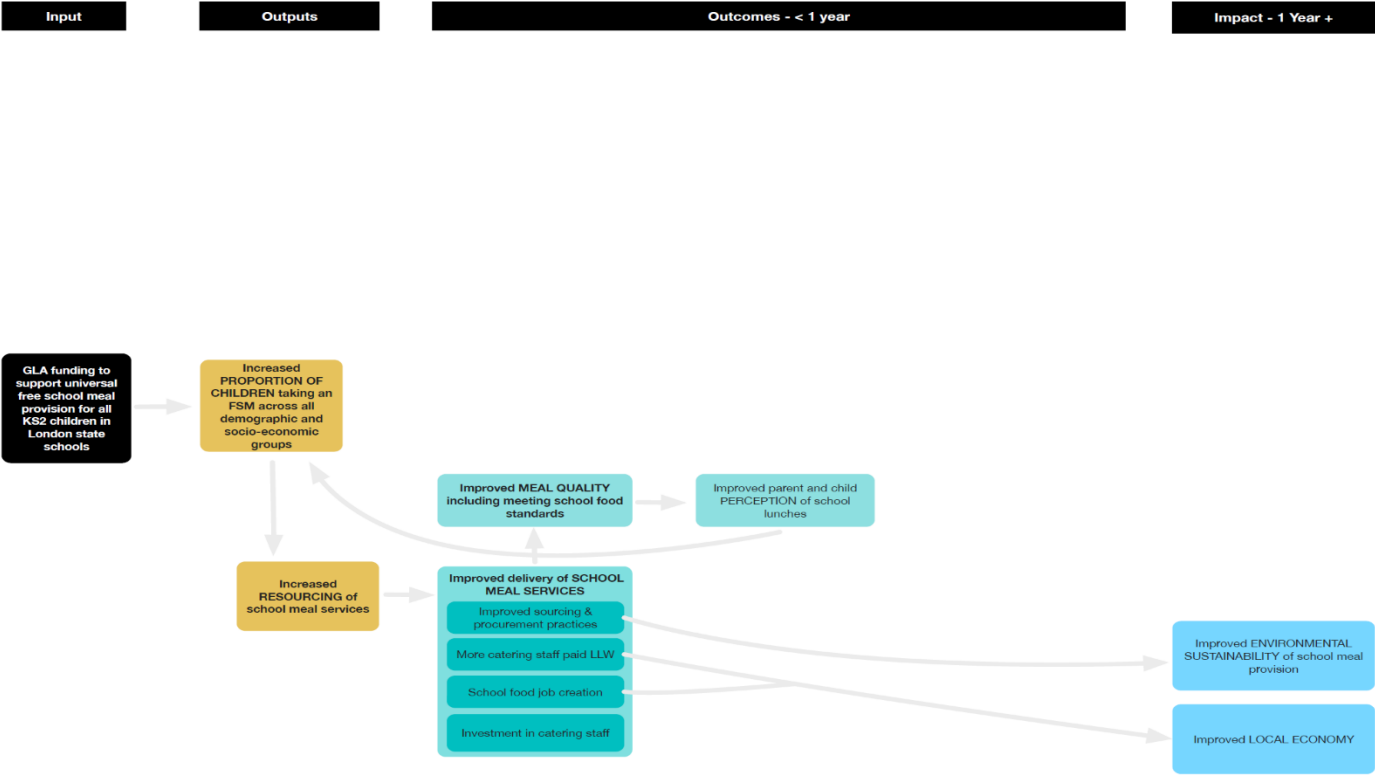
Impact: Mental Health and Wellbeing



Impact: Physical Health







Universal Primary Free School Meals – a Rapid Evidence Review

Produced by Impact on Urban Health; and Abigail Page and Myles Bremner, Bremner & Co

Introduction

In February 2023 the Mayor of London announced £130m of emergency funding to help families with the cost of living, by extending access to FSM to all KS2 children in London schools for the 2023-24 academic year.

IoUH commissioned Bremner & Co to develop a Theory of Change that could build consensus to:

- guide evaluation priorities
- help ensure evaluation builds on the current UFSM evidence base
- support coordination of evaluation projects
- support generation of relevant and actionable insights for priority audiences.

Updated Systematic Review

To inform the Theory of Change we worked with an independent academic team, led by Professor Juliana Cohen in the Harvard School of Public Health; and Gabriella McLoughlin at Temple University College of Public Health. As authors of a recent systematic review of the international literature on UFSM provision, they were well placed to present a robust and coherent picture of the current evidence base.

The updated systematic review examines UFSM provision only and takes account of breakfast and lunch programmes. The review examines the relationship between UFSM provision and: overall meal participation rates; diet quality; child food insecurity; school attendance; academic performance; BMI; and school finances. For each of these outcome areas, the UK evidence is presented first before the international evidence is considered.

Studies included in the review were quantitative and published in peer-reviewed journals or government reports. An assessment of study quality and bias was undertaken by the reviewers, and a detailed description of the methodology is included within the review. A short summary of the qualitative evidence relating to issues of implementation of UFSM policies, which were outside the scope of the original systematic review, is also included.

It should be noted that there is a limited, but growing, evidence base evaluating UFSM provision internationally, and even more so in the UK. The review identifies where there is a need for further research and makes recommendations for future study designs.

An evidence-based Theory of Change

In developing the Theory of Change we sought to situate the findings of the systematic review within the context of the wider literature, and the views and experiences of stakeholders for each of our hypothesised impact areas. In the following sections we provide a high-level summary. The impacts are predicated on an increased take-up of school meals (for which the systematic review finds a strong evidence base), and underlying assumptions about the way in which the policy is delivered. These assumptions draw on both the literature on UFSM policy implementation, and the experience of stakeholders within the school food system; and are detailed within the Theory of Change.

Household financial circumstances and food security

The systematic review finds good evidence to suggest that UFSM provision is associated with increased food security. There is evidence from England that UFSM policies have led to cost savings for families. Studies use different measures and methodologies to estimate cost savings. One study looking at the UFSM programme estimated household savings to be £10 per week per child (Sellen et al., 2018). Another study evaluating data from UFSM provision at KS1 and 2, in some LAs in England, estimated monthly household food expenditure reductions of between £34.50 (in a household with one parent and one UFSM-eligible child) and £69.00 (in a household with two parents and two UFSM-eligible children) (Holford and Rabe, 2022). In low-income households where weekly family food budgets may be as low as £25, such savings make a significant contribution to household finances and food security (O'Connell and Brannen). Qualitative studies from the UK highlight the importance of FSM in contributing to child and household food security for those families in receipt of the means tested-benefit (Shinwell and Defeyter, 2021; O'Connell and Brannen, 2021).

Mental health and wellbeing

We suggest that the introduction of UFSM could have positive mental health and wellbeing impacts for children and their families. There is evidence of an association between good diet quality, and positive mental health and wellbeing in children (O'Neil et al., 2014; Khalid et al., 2016). Improving children's diet quality through UFSM provision (assuming increased participation and improved quality arising from increased resourcing) could therefore contribute to improved mental health. For food insecure families the effects could be particularly pronounced. There is a well-documented association between adult and child food insecurity, and poor mental health and wellbeing outcomes, including depression, anxiety and stress, and in children suicidal ideation (Cain et al., 2022). We suggest that reducing food insecurity should therefore support improvements in mental health and wellbeing. Qualitative studies identify that food insecure children in England experience feelings of stigma and shame (Connolly, 2022; O'Connell and Brannen, 2022). There is also evidence that, despite school efforts to minimise identification of children eligible for FSM, experiences of means-tested FSM provision can also lead to embarrassment and shame (Sahota et al., 2014; NECPC, 2021; O'Connell and Brannen, 2022). The systematic review finds evidence that universal meal provision can lead to reduced stigma.

Physical health

The systematic review finds that there is good evidence of an association between UFSM provision and improvements in children's diets, where strong nutrition standards are in place, although limited research from the UK with a low risk of bias. The importance of a good diet to achieving good health outcomes throughout the life course is well understood, and its contribution to children's physiological development is critical (UNICEF, 2019). There is a high correlation between food insecurity and a poor diet, and child food insecurity is associated with poor general health and increased risk of hospitalisation (Gunderson et al., 2015; Aceves-Martins et al., 2018). Food insecurity and poor diet are also linked to chronic diseases and cancer throughout the life course (Marmot et al., 2020).

Within the UK there is consistent evidence that packed lunches have a lower nutritional content than school lunches (Stevens et al., 2013; Evans et al., 2016; Evans et al., 2020), particularly for children within low-income households (Stevens and Nelson, 2011). Families on low incomes, but not eligible for FSM, report they are unable to afford paid for school meals (O’Connell and Brannen, 2022). We infer that increased uptake of school meals could improve the diet quality of children making the change from packed lunches to school meals, and would have significant impact for children in poorer households.

Additionally, the systematic review finds there is some evidence to suggest that the household savings delivered through UFSM can contribute to improvements in household diet quality, through releasing money to spend on household food purchasing. Through improved diet amongst children and their families, we might hope to see a reduction in diet related ill health.

The systematic review finds that there is also moderate evidence to suggest that UFSM provision is associated with no adverse impact on body mass index, and potentially with reduced risk of overweight.

Learning and attainment

The systematic review finds moderate evidence from the UK and internationally that UFSM provision is associated with improvements in academic performance. We suggest there are a number of ways in which UFSM provision could have a positive impact on children’s learning and attainment, namely improved: attendance; cognitive function; and social and learning behaviours. The systematic review finds moderate evidence that there is a positive relationship between UFSM provision and attendance, although there is limited research from the UK. Researchers propose that improved health arising from improved nutrition leads to reduced health-related absence; and that accessing the free lunch offer could be a motivating factor. Additionally, school stakeholders we spoke to suggested that the positive experience of commensality (eating together) and reduced feelings of stigma and shame would improve children and their families’ relationships with school and so improve attendance. It was also suggested that this would improve social and learning behaviours in the classroom leading to improved learning outcomes.

There is a relationship between diet quality and brain development, protection and cognition (Naveed et al. 2020). There is consistent evidence that long-term healthy dietary consumption is positively associated with executive function, which is important for “goal-directed behaviours, including inhibitory control, working memory, attention and planning”. (Cohen et al., 2016 p.989). Working on the assumption that increased school meal uptake would lead to improved diet quality (for which the systematic review finds good evidence of an association), we consider that it could also contribute to improved cognitive function and so in the long-term academic attainment.

We hypothesise that UFSM would be particularly important for children experiencing food insecurity. There is growing evidence to suggest an association between food insecurity and poorer academic attainment (Aceves-Martins et al. 2018; Cullinane et al., 2023), which may in part be due to an absence of the nutrients and energy required for executive function described above. A separate systematic review also found an association between child food insecurity and behaviours such as self-control, aggression, hyperactivity and inattention all which can have an impact on learning (Shankar et al., 2017).

Local economy

The World Food Programme (WFP) estimates that globally 1,377 jobs are created for every 100,000 children fed via a school feeding programme (WFP, 2022). A cost-benefit analysis of UFSM provision in England estimates a £52bn contribution to the economy over a 20-year time period linked to returns to labour and supply chain procurement from UFSM provision (IoUH, 2022). Although limited by the one-year nature of this policy, we might hope to see some short-term increases in local labour demand and supply chain requirements arising from the expansion to UFSM provision. The principles of grant accompanying the GLA funding for UFSM encourage

schools to pay their catering staff the LLW, which should contribute financial security amongst those workers and possibly increased spending within the local economy.

Environmental sustainability of school meals

The principles of grant also encourage schools to meet sustainable catering guidelines and to support environmental aims. One important dimension of ensuring the sustainability of school food is achieving minimal food waste (Oostindjer et al., 2017). Qualitative evidence within the systematic review suggests that this could be addressed through “ensuring sufficient time to eat, as well as age-appropriate portion sizes, effective communication strategies, and accounting for student food preferences and cultural norms when planning meals” (p14).

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ANNEX B – EqlA

[MD3146 Appendix A \(i\) EqlA \(2\).pdf](#)

ANNEX C – Independent Schools Analysis

[MD3146 Appendix A \(ii\) Independent Schools Analysis \(2\).pdf](#)

Annex D – Policy review list

Document	Key policy/strategy	Key considerations
The London Food Strategy 2018	Good food at home, and reducing food insecurity	<ul style="list-style-type: none"> • Ensure all Londoners can eat well at home and tackle rising levels of household food insecurity. • Reduce school holiday hunger by improving provisions for children from low-income families. • Research to measure household food insecurity. • Promote employers paying the LLW. • Ensure physical and financial access to good food. • Promote food education and skills within schools to help improve Londoners' skills and food knowledge. • Structural and economically viable long-term solution for household food insecurity and malnutrition. • Create an environment that enables individuals to access and eat healthy food at home.
The London Food Strategy 2018	Good food economy, shopping and eating out	<ul style="list-style-type: none"> • Support good food businesses to improve London's food environment; and make healthy, affordable options more widely available to Londoners. • Deliver advertising restrictions on unhealthy food and drinks; and introduce additional measures to promote healthy eating. • Support and promote plans, values-driven food businesses, social enterprises and foundations to improve access to healthy and affordable food. • 'Good Food Retail Plans' – improve access to healthy and affordable food. • Support values-driven food businesses and social enterprises, especially those serving disadvantaged communities. • Promote a dynamic and innovative approach to mitigate challenges posed by Brexit, and continue to grow a strong food economy.
The London Food Strategy 2018	Good food in community settings and public institutions	<ul style="list-style-type: none"> • Work with public sector partners to improve their food procurement for the communities they serve. • Support collaboration between groups to develop and implement healthy good policies; and help on the food needs of vulnerable groups.
The London Food Strategy 2018	Good food for pregnancy and childhood	<ul style="list-style-type: none"> • Use good food to help give Londoners the best possible start to life.

Document	Key policy/strategy	Key considerations
		<ul style="list-style-type: none"> • Reduce child obesity – by 2030, halve the proportion of London’s children who are overweight at the start of primary school, and obese at the end of primary school; and reduce the gap between the richest and poorest areas. • Comply with Healthier Catering Commitments, to help reduce child obesity. • Support programmes for educational institutions to provide healthier food, and reduce health inequalities. • Support increased take-up of Healthy Start vouchers to 80 per cent of eligibility; and increase acceptance by retailers. • Support water-only primary schools. • Support lobbying to provide UFSM for all, to reduce child obesity and food insecurity. • Promote further guidance to support implementation of School Food Standards. • Support lobbying of National Childhood Obesity Plan. • Support uptake of FSM. • Support Ofsted to adopt food as key indicator of school’s performance. • Support whole-school food policies to improve food culture. • Support collaboration between the third sector and the healthcare sector to support healthy eating in pregnancy. • Support the Long Health and Social Care Devolution Agreement (establishing healthy School Superzones).
The London Food Strategy 2018	Good food growing, community gardening and urban farming	<ul style="list-style-type: none"> • Promote the multiple benefits of food growing for individuals and communities.
The London Health Inequalities Strategy 2018	Healthy children	<ul style="list-style-type: none"> • Ensure the adoptions of the Healthy Early Years London programme, particularly in the most deprived communities. • Support parents and carers to give all children the best possible start to life.

Document	Key policy/strategy	Key considerations
		<ul style="list-style-type: none"> • Support early-years settings and schools to nurture the health and wellbeing of children and families, with programmes reaching the most vulnerable. • Support children to achieve and maintain a healthy weight. • Support all children and young people to grow into healthy, resilient adults.
The London Health Inequalities Strategy 2018	Healthy places	<ul style="list-style-type: none"> • Improve air quality, and have fewer harmful pollutions – especially priority areas such as schools. • Reduce poverty and income inequality which impacts health. • Increase the number of working Londoners who have health-promoting, well-paid and secure jobs. Ensure the LLW reflects the actual costs of living in London.
The London Health Inequalities Strategy 2018	Healthy communities	<ul style="list-style-type: none"> • Support Londoners to improve their own health and wellbeing, as well as that of their communities. • Support communities to ensure they are safe, and are united against all forms of hatred. • Develop social prescribing strategy and promote community use, particularly the most deprived communities. • Support communities to tackle HIV, TB and other infectious diseases; and address the stigma around them.
The London Health Inequalities Strategy 2018	Healthy living	<ul style="list-style-type: none"> • Promote physical activity needed to sustain good health, particularly supporting the most inactive. • Deploy the London Food Strategy to ensure access to healthy food for the most vulnerable and deprived communities. • Reduce use or harms inflicted by tobacco, illicit drugs, alcohol and gambling.
The Mayor's Equality, Diversity and Inclusion Strategy 2018	Equal communities	<ul style="list-style-type: none"> • Ensure a more equal, integrated and inclusive city. • Reduce child poverty rates. • Ensure inclusive and continued education and training. • Enable safe and healthy communities. • Ensure the GLA is an inclusive employer.

Document	Key policy/strategy	Key considerations
The London Plan 2021	Social infrastructure	<ul style="list-style-type: none"> • Ensure sufficient supply of good-quality education and childcare facilities to meet demands and provide educational choices. • Ensure sufficient supply of good-quality sports and recreation facilities. • Where possible, spaces for food growing should be incorporated in playgrounds and school sites, supporting health and educational benefits. • Ensure social infrastructure meets the needs of diverse communities.
The London Plan 2021	Transport	<ul style="list-style-type: none"> • 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. • Reduce freight trips on the road network.
London Environmental Strategy 2018	Environment (new approaches)	<ul style="list-style-type: none"> • Promote a low-carbon circular economy. • Promote green infrastructure and natural capital accounting. • Promote the Healthy Streets Approach.
London Environmental Strategy 2018	Environment (air quality)	<ul style="list-style-type: none"> • Reduce exposure to harmful pollution across London, especially at priority locations such as schools; and tackle health inequality. • Achieve legal compliance with UK and EU limits as soon as possible. • Achieve air quality targets for a cleaner London, meeting WHO health-based guideline by 2030, by transitioning to a zero-emission London. • Reduce impacts on most disadvantaged communities.
London Environmental Strategy 2018	Environment (waste)	<ul style="list-style-type: none"> • Reduce waste, with a specific focus on single-use plastic and food waste.
London Environmental Strategy 2018	Environment (noise)	<ul style="list-style-type: none"> • Reduce the adverse impacts of noise from transport and non-transport sources. • Promote a reduction in car travel (encourage walking, cycling and public transport). • Promote quieter, low-emission vehicles and road surfaces. • Reduce noise from freight activity through the consolidation of services.

Document	Key policy/ strategy	Key considerations
London Environmental Strategy 2018	Environment (climate adaptation)	<ul style="list-style-type: none"> • Adapt and manage risks and impacts of severe weather and future climate change in London on critical infrastructure, public services, buildings and people. • Ensure London's water supply is safe, efficient, secure, resilient and affordable. • Ensure infrastructure providers and occupants of homes, schools, hospitals and care homes are aware of the impact of increased temperatures and the Urban Heat Island, to protect health and reduce health inequalities.
London Environmental Strategy 2018	Environment (climate change mitigation and energy/transition to a low-carbon economy)	<ul style="list-style-type: none"> • Decarbonise homes and workplaces, while protecting the most disadvantages by tackling fuel poverty. • Deliver a zero-emission transport network by 2050. • Enable transition to Low carbon circular economy Create jobs, contribute to economy.

Annex E – Stakeholder engagement

Stakeholder group type	Stakeholder organisation
<p>Local authorities (LAs)</p> <p>NB: Representatives of all LAs in London were made aware of the workshop, and some boroughs were invited to attend. Of these, eight attended.</p>	<p>London boroughs</p> <p>A separate series of engagement workshops were held with London boroughs already providing UFSM.</p> <p>The following boroughs attended the stakeholder workshop:</p> <ul style="list-style-type: none"> • Redbridge • City of London • Ealing • Newham • Tower Hamlets • Hillingdon • Waltham Forest • Royal Borough of Kensington and Chelsea
Central government	Office for Health Improvement and Disparities
Regional partners	<p>London Councils</p> <p>Association of Directors of Public Health London</p>
Environmental local authorities' partnerships	ReLondon
Parents and family groups	<p>Gingerbread</p> <p>London Black Women's Project</p>
Children's groups	<p>CPAG</p> <p>End Child Poverty Coalition</p>
School meals providers	LACA – the School Food People
Food charities	<p>The Felix Project</p> <p>The Food Foundation</p> <p>Mayor's Fund for London</p> <p>Trussell Trust</p>
Faith groups	<p>British Islamic Medical Association</p> <p>City Sikhs</p> <p>Multi Faith Forum</p>

Stakeholder group type	Stakeholder organisation
	London Jewish Forum Muslim Council Partnerships for Jewish Schools

Annex F – Glossary of abbreviations & terms

Abbreviations	Definition
CPAG	Child Poverty Action Group
DfE	Department for Education
DLUHC	Department for Levelling Up Housing and Communities
EA	Environmental Assessment
EclA	Economic Impact Assessment
EqIA	Equality Impact Assessment
FSM	Free School Meals
GCSE	General Certificate of Secondary Education
GLA	Greater London Authority
HIA	Health Impact Assessment
HM Treasury	His Majesty's Treasury
HUDU	Healthy Urban Development Unit
IIA	Integrated Impact Assessment
KS1	Key Stage 1
KS2	Key Stage 2
LA	Local Authority
LACA	Local Authorities Catering Association
LB	London Borough
LLW	London Living Wage
MHCLG	Ministry of Housing, Communities & Local Government
NHS	National Health Service
NRPF	No recourse to public funds
Ofsted	The Office for Standards in Education, Children's Services and Skills
ONS	Office for National Statistics
PHE	Public Health England
PwC	PricewaterhouseCoopers
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SEND	Special educational needs and disabilities
UFSM	Universal Free School Meals
UIFSM	Universal Infant Free School Meals
WHO	World Health Organization

Terms	Definition
Alternative provision (AP)	Education arranged by local authorities for pupils who, because of exclusion, illness or other reasons, would not otherwise receive suitable education; or education arranged by schools for pupils on a fixed period exclusion, and/or pupils being directed by schools to off-site provision to improve their behaviour.
Baseline	Existing conditions against which future changes can be measured.
Economic Impact Assessment (EclA)	The assessment of a project, plan or policy's economic impacts (both beneficial and detrimental), identifying economic benefits and measures to avoid, manage, minimise and mitigate economic impacts.
Eligibility	Whether a pupil meets the income threshold to qualify for FSM under the current policy.
Equality Impact Assessment (EqIA)	A predictive assessment of the possible equality effects arising from the design and implementation of a plan, policy, project or strategy for people sharing one or more protected characteristics.
The Equality Act	An Act of Parliament that consolidates previous legislation – including the Sex Discrimination Act 1975, the Race Discrimination Act 1976, and the Disability Discrimination Act 1995. It is designed to prohibit discrimination on the grounds of those protected characteristics described in the Act.
Free school meals (FSM)	The national government-funded scheme for the provision of FSM for KS1 pupils on a universal basis, and for KS2 pupils according to prescriptive eligibility criteria within state-funded primary schools.
Health Impact Assessment (HIA)	A practical approach used to assess the potential health effects of a policy, programme or project on a population, particularly on vulnerable or disadvantaged groups.
Ineligible pupils	Pupils who do not meet the current criteria to be eligible for FSM.
Integrated Impact Assessment (IIA)	A means by which different technical assessments are brought together in a holistic and integrated manner. For the UFSM IIA, this includes the EA, the EqIA, the HIA and the EclA.
Key Stage 1 (KS1)	A phase of primary education for pupils aged 5 to 7 in England.
Key Stage 2 (KS2)	A phase of primary education for pupils aged 7 to 11 in England.
Packed lunch	A lunch provided and paid for by the pupil's family, parent or guardian.
Paid-for school lunch	A school meal paid for by the family, parent or guardian when a pupil is not eligible for FSM.
Protected characteristics	Nine groups identified in the Equality Act 2010 as sharing a particular characteristic against which it is illegal to discriminate: <ul style="list-style-type: none"> • age • disability

Terms	Definition
	<ul style="list-style-type: none"> • gender reassignment • marriage and civil partnership • pregnancy and maternity • race • religion and belief • sex • sexual orientation.
Public Sector Equality Duty	<p>The Public Sector Equality Duty (s.149 of the Equality Act 2010) requires public authorities, in carrying out their functions, to have due regard to the need to:</p> <ul style="list-style-type: none"> • eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010 • advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. • foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
Pupil premium	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 FSM or has claimed FSM in the last six years, their school receives financial income.
UFSM	The Mayor of London's scheme to ensure that all children in state-funded primary schools in the capital receive FSM for the 2023-24 and 2024-25 academic years.
Special educational needs and disabilities (SEND)	Learning difficulties or disabilities that make it harder for a child or young person to learn compared to children of the same age.
Strategic Environmental Assessment (SEA)	A systematic process for evaluating the environmental implications of a policy, plan or programme.
Study Area	Defined area where the policy will be applied (across all London boroughs). It is used as a geographical basis for reporting local community impacts and effects.
Sustainability Appraisal (SA)	A systematic process that must be carried out during the preparation of local plan, policy and/or strategies, and that promotes sustainable development by assessing the extent to which the emerging plan/policy/strategy will help achieve environmental, economic and social objectives.
Take-up	A figure estimated on School Census Day, to determine how many pupils who are eligible for FSM have 'taken' and consumed a school lunch.
Universal Infant Free School Meals (UFSM)	The current universal provision of FSM to all children in KS1, in state-funded schools.

Annex G – Updated Literature Review

A rapid literature review of new evidence

A systematic review of the literature was undertaken in March 2023, as part of the development of an evidence-based Theory of Change. This was developed by Bremner & Co and funded by IoUH. This can be found annexed in the [IIA](#).

A preliminary rapid review of the evidence was undertaken in February 2024, to identify any new considerations for the UFSM IIA. A second Theory of Change will be developed in March 2024, by Bremner & Co (funded by IoUH), considering the policy's extension into a second year and this will include a further systematic review of the literature.

Findings below are high-level and themed according to impacts. The information below only captures new learning, and is intended to be read alongside the 2023 review.

Household financial circumstances and food security

Latest research continues to show the success of UFSM schemes as alleviating household financial hardship and reduces food insecurity. A study by the ISER reported household savings of £41 every four weeks.¹⁰⁷ Another report highlighted reduced financial hardship and stress for families.¹⁰⁸ A 2023 article from BMC Public Health looks at a UFSM pilot scheme in two secondary schools in London. An evaluation of the pilot found that it increased access to a healthy meal, reduced food insecurity, improved nutrition, and generated some social benefits.¹⁰⁹ Additional evidence from the Institute for Fiscal Studies suggests that a meal price of £2.87 would be in line with inflation.¹¹⁰

Learning and attainment

Latest evidence continues to highlight food security and reduced hunger can be associated with positively impacting learning attainment.¹¹¹ Additionally, a slight improvement in reading scores was evidenced in a study from the ISER. Although, no improvement in maths or writing was observed.¹¹²

A study from The Food Foundation found that children who had not eaten in the morning were hungry, thus this impacted their ability to concentrate in lessons. The impact on attainment may therefore be limited for children who only eat lunch.¹¹³

Environment

Evidence suggests that school meal systems have the potential to help enable sustainable food transitions, and that well-planned plant-based meals in schools may strengthen this

¹⁰⁷ ISER, [The impacts of Universal Free School Meal schemes in England](#), February 2024

¹⁰⁸ Health Promotion International, [Health, wellbeing and nutritional impacts after 2 years of free school meals in New Zealand](#), August 2023

¹⁰⁹ BMC Public Health, [A qualitative process evaluation of universal free school meal provision in two London secondary schools](#), February 2023

¹¹⁰ Institute for Fiscal Studies, [The policy menu for school lunches: options and trade-offs in expanding free school meals in England](#), March 2023

¹¹¹ UK Parliament POST, [Child food insecurity and Free School Meals](#), July 2023

¹¹² ISER, [The impacts of Universal Free School Meal schemes in England](#), February 2024

¹¹³ The Food Foundation, [A Better Deal for Free School Meals](#), November 2023

potential.¹¹⁴ A report assessing the impact of a school lunch programme in New Zealand highlighted low school meal uptake created increased food waste.¹¹⁵

Other recent evidence in 2023 investigates the role of LAs as creating healthy sustainable forms of food production. The report outlines a range of initiatives taken by LAs across the UK covering issues like restricting advertising of food containing high fat, sugar and salt across council estates, using procurement systems to improve the quality of school food and making it easier for local food suppliers to access regional public supply chains.¹¹⁶

New legislation on packaging came into force earlier in 2024 and encourage 'small producers to collect data' on packaging. This includes the government ban on single use plastics¹¹⁷ and the extended producer responsibility scheme.¹¹⁸

The City Hall Environment Committee on 7 February 2024 highlighted the role of UFSM having the power to shift policy across the whole of England, through transforming how food is procured. Additionally, the committee highlighted UFSM could play a more prominent role in other Mayoral policy areas e.g. Superzones. The role of plant-based food in reducing emissions, improving health, and reducing school catering costs was also highlighted.

The Committee also highlighted the importance of 'Capital Growth' – a scheme to promote local food production, noting that LAs own land that could be used to grow local food, and minimise transportation of food, suggesting policy makers to lever funding opportunities to LAs to encourage this.¹¹⁹

Physical health

In a recent study by the ISER, evidence suggests a positive improvement on obesity levels amongst children. This included a reduction in obesity levels in reception children (7 per cent to 11 per cent) and year 6 (5-8 per cent), in a study in London boroughs where children had received free school meals for their entire time in primary school. However, UFSM did not appear to have an impact on obesity levels in schools that already had the highest levels of obesity.¹²⁰ The study suggests additional interventions to reduce obesity in these particular schools.

The results suggest that starting free meal provision early and maintaining it throughout primary schools would maximise the impact on cutting obesity rates and would thereby best contribute to lowering the long-term healthcare and indirect productivity costs of obesity.

Wider economic benefits

A report commissioned by IoUH, by PwC in October 2023 investigated the expansion of FSM across primary and secondary schools in London and England. The report in October 2023 focuses on the wider contribution stimulated by the supply chain activities from expanding FSMs and focuses on 2024-2030.

¹¹⁴ Journal of Agriculture and Food Research, Plant-based school meals as levers of sustainable food transitions: A narrative review and conceptual framework, December 2022

¹¹⁵ Health Promotion International, Health, wellbeing and nutritional impacts after 2 years of free school meals in New Zealand, August 2023

¹¹⁶ Ref No: AA0056; Petrovic, Leticija. Serving up a food strategy, IN MJ, 7 Sep 2023, pp14-15.

¹¹⁷ Defra, Guidance on single-use plastics bans and restrictions, January 2024

¹¹⁸ Defra, Guidance on extended producer responsibility for packaging: who is affected and what to do, June 2022 (updated July 2024)

¹¹⁹ London Assembly, Environment Committee meeting, 7 February 2024

¹²⁰ ISER, The impacts of Universal Free School Meal schemes in England, February 2024

The estimated 2024-2030 GVA impact for UFSM provision in England for this shorter time period is £13.9bn and London £2.1bn. Where for both London and England, the majority of the wider GVA generated through expanding UFSM provision comes from the supply chain activities, mostly contributed by the Food and Beverage sector.

The estimated 2030 jobs supported for England is 40k additional FTEs and 5.2k additional FTEs for London. Where for both London and England, the majority of the wider FTE jobs supported through expanding UFSM provision is from the Food and Beverage and Wholesale Trade sectors.¹²¹

In a report on the economic rationale for investment in UFSM, evidence points to high return on investment in human health and economic benefits. As well as financial relief to families, the report also highlights economic development and job creation leading to 207,700 new jobs over 10 years. The report also highlights an increase in students' lifetime earnings between 3 per cent and 6 per cent due to improved learning outcomes.¹²²

Stigma and Inequality

The study by the ISER also found that making free school meals universal also increased their take-up by those who had already been entitled to them by 8 per cent, possibly because it changed school culture and the stigma around having them. It appeared to lead to one in three children eating a school lunch for the first time.

Research from CPAG and NEU highlights nutrition improved for pupils, change eating habits, improved home school relationships and encouraged uptake in government eligible pupils.¹²³

However, a report from the Food Foundation, notes that an estimated 33 per cent of children with disabilities miss out on the government's free school meal provision, despite meeting the income-related eligibility requirements. This is due to the food on offer not meeting their dietary requirements or sensory processing difficulties, or not being in a school to access the food (due to long term illness). This also has a knock-on financial affect, with 85 per cent of these families that are missing out on free school meals reporting that this increased pressure on their weekly budgets. The report also refers to the administrative challenges which hinder children's access to free school meals, as many people do not qualify for benefits despite having a disability¹²⁴.

A report published by the House of Commons highlights that there are additional challenges with children receiving free school meals, one of which is that disadvantaged children, who are most likely to be eligible also have the highest rate of non-attendance in schools. The report notes that this poses an issue as despite the service being available, the relevant children are not receiving the benefit. The report does note that data is inconclusive when relating to provision of free school meals and an increase in attendance, showing that there is little to no correlation between the two, disadvantaged pupils are increasingly more disadvantaged.¹²⁵

¹²¹ IoUH, [Expanding free school meals: Exploring the wider economic benefits](#)

¹²² Ruetz Consulting, [The Economic Rationale for Investing in School Meal Programs for Canada: multi-sectoral impacts from comparable high-income countries](#), October 2023 (updated February 2024)

¹²³ CPAG, [The universalism multiplier](#), December 2023

¹²⁴ The Food Foundation, [Food insecurity and inequalities experienced by disabled people](#), December 2023

¹²⁵ UK Parliament Education Committee, [Tackle school absence crisis with better mental health and SEND support and urgent legislation](#), says Education Committee, September 2023

Supplementary analysis on London school sector

1. Purpose

- The Greater London Authority (GLA) City Intelligence Unit and the GLA Universal Free School Meals (UFSM) team have conducted analysis into the London independent school sector (with a particular focus on faith schools), using publicly available data.
- This analysis was initially completed in June 2023 to ensure all considerations were made in the policy development of the Mayor of London's UFSM scheme. It has been kept under review, and was last updated in June 2024 to inform the extension and ongoing delivery of the UFSM scheme.
- This analysis supplements the findings of an equality impact assessment (EqIA) of the Mayor's UFSM scheme, which was commissioned to an external organisation, Arup. It has since been kept under review by the GLA, and was last updated in June 2024.

2. Background

- The Mayor initially allocated £130m, as part of the budget-setting process for 2023-24, for the provision of a Mayoral offer for UFSM. This offer was for Key Stage 2 (KS2) children in state-funded primary schools (including academies, and state-funded special schools and alternative provision (AP)) who are not entitled to free school meals (FSM) funded by the government under the national scheme.
- In January 2024 the Mayor announced the extension of the UFSM scheme for the 2024-25 academic year, at a cost of £140m.
- The Mayor's UFSM scheme was designed for state-funded primary schools, partly as it was intended to supplement the national government's FSM scheme. However, it was extended to universal provision in line with the parameters set by the national government-funded policies for FSM and universal infant free school meals (UIFSM) (covering state schools). Further explanation for the scope of coverage is set out in this paper.
- This is a limited pot of money that is insufficient to cover every child in London. Therefore the policy has prioritised children in state-funded primary schools above those in schools that may charge fees, or receive alternative income for pupils, that could be used to pay for meals.
- To assist with the Mayor's policy development the following section sets out:
 - the key findings and summary of the supplementary analysis undertaken in supporting this policy

- the actions that will be taken to respond to these needs.
- The EqIA assessed the equality impact of UFSM to ensure that: all considerations could be made in the policy development; and any mitigations were considered from an early stage.
- This analysis relates to independent schools that are registered with the Department for Education (DfE) and meet the requirements of the Education (Independent Schools Standards) Regulations 2014.
- Educational establishments that are not registered with the DfE are out of scope for both this analysis and any consideration of further expanding the Mayor's UFSM. This is because it is against the law to run an independent school that is not registered with the DfE.
- This analysis notes that, within the independent school sector, there are different types of independent schools. These can broadly be defined as "association" and "non-association" schools. Ofsted regulates "non-association" independent schools, while the Independent Schools Inspectorate (which has been approved by the DfE) regulates "association" schools.
- Within these broad categories relating to the regulation of the schools, there are further sub-categories of independent schools, including independent special schools and independent faith schools.
- Independent schools, including independent faith schools, do not have to teach the national curriculum. However, they must meet minimum standards set out in the Education (Independent Schools Standards) Regulations 2014.
- After the Mayor's 2023 announcement about his proposal to fund UFSM, submissions were received from representatives of the Charedi community. These sought expansion of the Mayor's UFSM programme to children attending independent faith schools in Hackney. The representations raised by the Charedi community include the following:
 - Around 78.7 per cent of Charedi children in London attend independent faith schools.
 - Attending independent Charedi faith schools is integral to this community's religious identity and beliefs. Although Charedi children can attend maintained educational settings and academies, in practice most families opt to send their children to independent settings.
 - All independent Charedi faith schools are charitable institutions funded partly by parents and the community; and charge significantly lower fees than other private schools. School meals are not always provided to children attending as part of the benefits package, unlike other independent schools.
 - Admission is not generally denied to any child whose parents are unable to pay these fees. Many families are unable to pay any school fees at all. It is therefore suggested that that these independent faith schools should be distinguished from other independent private schools.

- Members of the Charedi community have told the GLA that the average Charedi household is almost two-and-a-half times the size of the average UK household. Kosher food is over two-and-a-half times the cost of non-kosher equivalents.
- The families in these communities often have minimal savings, 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 kosher food.
- These representations suggested extending the UFSM scheme to independent schools charging lower fees (for example, £5,000 per year), and where the payment of fees is discretionary. This would reportedly include 20 of the 21 Charedi schools in Hackney.
- The representations provided by the Charedi community about its schools have been considered. Specifically, the Mayor has considered whether the UFSM policy should be extended to some independent schools, such as those serving the Charedi community. It is acknowledged that, according to the information provided on behalf of this community, some children at these independent faith schools come from families that: cannot pay school fees; are larger than average; and receive housing benefits and tax credits.
- Information about fees and the number of children who are eligible for national FSM (and therefore would be out of scope for UFSM) is not readily available for the whole of the independent sector. It is therefore deemed non-viable, as an option, to add an additional filter to the independent sector. This is further explained in the sections below.

3. Key findings of the supplementary analysis

Annex 2 sets out the data analysis sources and methodology.

- It has been found that 79 per cent of children aged 7-11 at independent schools in London (40,447 children) attend a school with no religious character.¹
- For the 2023-24 academic year, there are 73 registered independent faith-based schools in London. These schools have 10,817 primary-school pupils aged 7-11. Of these, approximately 50 are strictly Orthodox Jewish schools.
- The non-state-funded independent sector is made up of fee-paying schools. There is limited evidence for the scale of fees that are charged. The Independent Schools Council (ISC) Census 2024 has found the average day-school fee in London is £7,243 per term. In all instances, these fees are largely paid for by the parents. No full central data collection of fees could be found; and not all schools advertise their fees. Some Ofsted reports for independent schools indicate the fees for these schools, although some of these reports are several years old.

¹ DfE, [Academic year 2023/24: Schools, pupils and their characteristics](#), published 6 June 2024 and updated 10 June 2024

- Independent schools do not generally receive state funding. Nor are they bound by any conditions of government, such as following the national curriculum. This means such schools are not subject to associated cost pressures.
- There is no central register showing inclusion of meals in the school fees; a sample method analysis shows that most (but not all) independent schools include the cost of meals in their termly fees. Other schools request that parents keep a meals account topped up with funds, which pupils can draw on by swiping a card each day.
- Across London, there are several independent faith schools that are fee-paying. Many of these provide meals for their pupils; this is covered by the fees paid for children to attend these schools.
- This analysis notes anecdotal evidence that some independent schools, particularly independent faith schools – such as Charedi community schools – charge optional and/or nominal fees. There is no central record of fees charged, and not all establishments advertise their fees. It also notes that most independent schools – including those considered to charge high fees, independent faith schools and independent special schools – also offer bursaries and/or scholarships for pupils from lower socioeconomic backgrounds. These may cover either partial or full admission fees.
- In 2022, the government stated that 50 per cent of independent schools had charitable status; and in 2024, the ISC found that 69 per cent of their independent schools had charitable status. The data to break this down to regional levels is not readily available. Moreover, of those circa 50 schools that are known to be strictly Jewish Orthodox in the UK, there are about 40 independent schools with a Jewish faith designation, although inspection evidence suggests that around 60 schools actually have an Orthodox Jewish character. They are concentrated in the Hackney, Haringey and Barnet areas of London, with a smaller group in Greater Manchester.
- Financial information on independent schools is available on the Charity Commission's website. This provides information on income and expenditure; employees; and other financial information such as assets and liabilities. It does not include any information on fees charged or spend on items such as school meals.
- There is no central register specifying whether an independent school is a limited company or a charity; or what fees it charges. To acquire information on every independent school in London would therefore require looking at each entry on the Charities Commission individually, as well as their website and Ofsted reports to gain information on fees. Such work would require hundreds of additional hours of UFSM officer time. The lack of a central register and up-to-date information for fees in the independent schools sector would render any proposal that substantively relies on such resources to be impractical and unreasonable.

- A report for the Institute for Fiscal Studies (IFS) in 2022 found that three-quarters of children attending private (fee -paying) schools are drawn from families in the top three income deciles, and mostly from the richest decile.²
- Although anecdotal evidence exists, there is no reliable data to assess the socio-economic background of the children who attend strictly Orthodox Jewish schools. It is therefore difficult to reliably ascertain the impact the cost-of-living crisis is having on Charedi children and how this differs to other children attending other independent schools, including children from lower socio-economic backgrounds who attend on means-tested scholarships. It is recognised that a lack of readily available data does not mean that Charedi families are not affected by the cost of-living crisis.

Issues with extending UFSM scheme beyond state schools

- The UFSM scheme is intentionally focused on the state sector. If the scheme were extended to the independent sector, or specific parts of the independent sector, this would give rise to considerable complexity in the operation of the scheme, and certain delay. This would also add extensive burden on the London borough councils – many of whom do not have dedicated teams to deliver FSM or UFSM policies, but rather rely on their existing resource and staffing infrastructures to deliver the UFSM scheme (e.g., generalist officer level/ education posts). Adding this layer of administrative complexity is likely to give rise to extra burdens on officers in boroughs; and prevent the programme from operating as intended, or from meeting the objectives set out in MD3224.
- Issues with this include the following:
 - Much of the practical implementation of the scheme is done by the boroughs, e.g., handling the school funding, liaising with caterers, etc. This is possible because of the long-established relationship between the boroughs and the state-funded schools in their area. These relationships do not readily exist between the boroughs and independent schools, so a wholly different, more time-consuming and costlier method for implementation would need to be devised.
 - There is no readily available administrative structure available for boroughs to implement a scheme in the independent schools sector, whereby the scheme could easily be expanded to ensure that only families in poverty, or who are suffering financial hardship, could benefit. This would be complex and take time to set up. As a result, including such schools would significantly delay the policy. This has been retested with London Councils in the planning for the year-two extension, and remains the case.
 - There are no national food standards for independent schools and no existing commissioning or contracts between local authorities and fee-paying schools. These would take time to put in place.
 - In most cases, the boroughs are acting as responsible bodies for the GLA's grant funding; and then providing on-grants to the eligible schools in their

² Green, F. (2022), 'Private schools and inequality', IFS Deaton Review of Inequalities

area. In turn, those schools will then use the on-granted funds to procure catering services. However, in a limited number of cases, some boroughs will use the GLA's grant-funding themselves to procure catering services on behalf of the eligible schools in their area. This means the borough is responsible for defining the delivery detail of this policy in any greater detail than set out in the GLA grant conditions and guiding principles. In year one it was agreed (in consultation with the boroughs and London Councils) that asking boroughs to further extend beyond state schools will add significant extra burden on them (and in some cases, would place significant risk to delivery of the whole scheme). Following discussion with London boroughs, London Councils and other partners for year two, this situation remains the same.

Other support available to families affected by the cost-of-living crisis, which will benefit families whose children attend independent (including faith) schools

- **Dedicated funding to support holiday hunger** – In April 2023, the Mayor launched the Free Holiday Meals programme. This made £3.1m available in grant funding to the Felix Project and the Mayor's Fund for London, to increase surplus food and meal provision to families needing support during the school holidays. This was delivered via community settings within these families' networks, including schools, adventure playgrounds, libraries, faith organisations and leisure centres.

Separately, and in response to the heightened demand for food aid across the year, the Felix Project received £425,000 to enable all four of its warehouses to deliver food on Saturdays as well as during the week. In this way, it was able to address urgent gaps in weekend food deliveries throughout 2023-24. In total, the combined funding resulted in the equivalent of more than 12.4m holiday and weekend meals delivered over 12 months, surpassing the programme's original target.

- In 2024-25, the Mayor has committed £4m funding to extend the Free Holiday Meals programme. Provision will continue to be delivered in every London borough. The GLA is working with partners to ensure provision reaches children and families experiencing the highest level of need and financial hardship, based on assessments of need undertaken by the community partners receiving food supplies.
- Through this project, the GLA and delivery partners are exploring ways for the needs of specific communities to be met – such as families with protected characteristics including faith and religious groups (which further includes Charedi communities). Delivery partners aim to meet the needs of London's diverse communities with culturally appropriate food made available as far as possible to communities with specific needs.
- **The Robust Safety Net mission** aims that, by 2025, every Londoner can access the support they need to prevent financial hardship. This includes Charedi families and children. The mission seeks to bring partners together around a common approach to supporting low-income Londoners; and relieving financial hardship where it exists. This mission includes the **Food Roots**

Incubator programme. The mission also works with providers of emergency food aid to meet demand and address the root causes of food insecurity. This work has been given added salience by the ongoing cost-of-living crisis.

- The original Food Roots Incubator programme ran from May 2021 to August 2022. It supported and invested in 10 local food partnerships to help them strengthen new relationships formed during the pandemic, and develop in ways that did not embed emergency food aid as the solution to food insecurity. The ‘food partnerships’ are (typically) local partnerships that provide support to Londoners experiencing food insecurity; and involve local authorities, voluntary and community sector organisations, and businesses.
- There is funding of £740,000 over 2022-23 and 2023-24 for a second phase of the Food Roots Incubator programme. This is being used to deliver a range of activities to support the sustainability of food partnerships and their constituent food-aid organisations, so they can better support Londoners who need to use emergency food aid. This will be accessible to communities such as the Charedi community.
- **Kitchen Social:** The Mayor’s Fund for London champions opportunities for young Londoners from low-income backgrounds. Kitchen Social is one of their programmes, providing holiday food and activity programmes to reach and support the hardest-hit families. Kitchen Social is currently focussed on addressing the growing and serious issue of children and young people facing food insecurity and social isolation outside of term time – including evenings and weekends. Currently 83 hubs exist across 24 London boroughs, with leaders from a range of faith groups, youth centres, schools and adventure playgrounds. Since 2017, the Mayor’s Fund for London has worked with over 215 community organisations in 28 London boroughs, supporting over 80,000 children and young people by providing over 1.2m nutritious meals. The Mayor will look for opportunities to support communities that have protected characteristics, such as faith and religious groups. This could include establishing new Kitchen Social hubs in locations where they can cater to the needs of specific communities – including specifically the Charedi community in Stamford Hill. Any support of this nature would seek to align with existing provision, and would be designed with the input of the communities in question.
- Hackney Borough Council also runs [summer holiday provision sites](#) at several Orthodox Jewish community centres that include the Charedi community. Hackney Council have also put in place a significant package of financial support and help for the borough’s most vulnerable residents, to help them overcome the increasing prices of everyday essentials such as food, clothes, transport, and utility bills. This includes the **Household Support Fund**. Since April 2023, Hackney Council has been distributing £2.8m of government funds to support households struggling with the cost of food, clothing, housing, and energy and water bills. Beneficiaries include the following:
 - Families with children: the council is working with schools, children’s centres and colleges to distribute food vouchers to those entitled to FSM, as well as under-5s and college students in need, during the summer break. This ensures no child goes hungry over the holidays. The council is also working

with community partners to reach families in the Orthodox Jewish community.

- Senior citizens living in income deprivation.
- Residents living in temporary accommodation or supported accommodation.
- The Mayor has also put into place a wide range of support to families across London. This includes:
 - warmer homes
 - dedicated advice in communities
 - London Living Wage
 - help to navigate the cost-of-living crisis.
- The Mayor and his officials are committed to continued work with local communities (including the Charedi community) to look at further ways to minimise the impact of the ongoing cost-of-living crisis.

4. Data considerations

- All existing data of independent schools (as defined by the ‘types of school’ guidance published by the DfE) is considered in this document.³
- Comprehensive data on the financial standing of the independent schools sector is limited. No comprehensive full central data collection of fees that are charged could be found; and not all schools advertise their fees.
- This independent schools analysis document takes into account a range of information (as described above and below), including the DfE datasets to provide an assessment of the potential impacts of UFSM on fee-paying independent schools.
- There are several types of independent schools in London: some have charitable status, others are faith-specific and some cater to special needs.
- These types of independent schools cannot be isolated in the DfE datasets. Therefore, this analysis – unless explicitly mentioned – covers fee-paying independent schools at a total level (all independent schools) in London.
- Only establishments that operate within regulation have been considered in this analysis. Any unregulated schools would not be within scope for this policy. This is because it is against the law to run an independent school that is not registered with the DfE.
- The ISC Census and Annual Report 2024 is a comprehensive source of data providing a picture of where independent schools sit in the UK’s education

³ DfE, [Types of school: Private schools](#)

landscape.⁴ It is based on a survey carried out by all 1,411 UK schools belonging to constituent associations of the ISC.

- The Charity Commission's website contains financial information on independent schools that are charities. It provides information on income and expenditure, employees, and other financial information such as assets and liabilities. It does not include any information on fees charged, or spend on items such as school meals.
- There is no central register listing whether an independent school is a limited company or a charity; or what fees they charge. To acquire information on every independent school in London would therefore require looking at each entry on the Charities Commission individually, as well as their website and Ofsted reports to gain information on fees.
- This information and assessment of the independent sector will continue to be monitored by the GLA throughout year two of the scheme.

⁴ [ISC Census and Annual Report 2024](#)

Annex 1 – Further background

Mayor of London UFSM Scheme

- In 2023-24 the Mayor provided an unprecedented £130m to provide FSM to pupils in state-funded primary schools (including state-funded schools for those with special educational needs and disabilities, and AP schools) for the next academic year. In January 2024 he announced he would be extending the scheme for a further academic year, at a cost of £140m.
- The Mayor's programme is in line with the government's policy for FSM covering state-funded primary schools, pupil referral units and special schools. This includes faith schools, but not independent schools.
- This approach – and the fact that in some communities, children do not generally attend state-funded schools – means these communities will not benefit from this funding. The FSM policy is just one in a range of steps the Mayor is taking to help Londoners deal with the cost-of-living crisis.

State vs Independent Pupils: Longitudinal Outcomes

- Office for National Statistics analysis found that government-funded FSM pupils earned less than their peers. Half of FSM recipients earn £17k or less, while the top-earning 10 per cent independent school pupils were earning £71k or more at age 30. This remains the case even when matching educational level and secondary school attainment. It also found evidence of the earning gap between 93 independent school students and FSM students widening as they got older. Part of this overall gap in lower earnings is because people from income-deprived backgrounds are significantly less likely to continue to higher education.⁵

Charitable status in independent schools

- As educational institutions, independent schools can take charitable status. The Charities Act 2011 defines a charity as an institution established for charitable purposes only; and which is subject to the jurisdiction of the High Court. The Act lists descriptions of a charitable purpose, and states it must be for the public benefit.
- The advancement of education is one description of a charitable purpose, and so independent schools are capable of being charities. Educational charities, like all other charities, must demonstrate they are for the public benefit. There is no statutory definition of what this means.
- The DfE does not regulate the charitable status of independent schools. However, in 2022 the government said around half of independent schools in England were registered as charities.

⁵ Impact on Urban Health, [Investing in Children's Future: A Cost Benefit Analysis of Free School Meal Provision Expansion](#), October 2022

- Most recently, the 2024 Annual School Census by the ISC found that 69 per cent of their member schools across the UK had charitable status.⁶ However, not all independent schools are affiliated with the ISC.
- Charitable status has associated advantages, including relief from business rates.

Scholarships and bursaries in high fee-paying independent schools

- According to the ISC Annual Census, 33.5 per cent of all pupils in their independent schools receive help with their fees. A significant majority (78 per cent) of total fee assistance is provided directly from the school itself.
- Schools gave more than twice as much assistance in the form of means-tested scholarships and bursaries as they did non-means-tested scholarships. Of these means-tested bursaries, nearly half of all pupils had more than half of their fees remitted; and 7,590 paid no fee at all.

Jewish children in Jewish schools

- The Institute for Jewish Policy Research found that, in 2020-21 in London, there were 12,284 Jewish pupils in mainstream Jewish schools; and 13,960 Jewish pupils in strictly Orthodox Jewish Schools.⁷

⁶ [ISC Census and Annual Report 2024](#)

⁷ Institute for Jewish Policy Research, [Numbers of Jewish children in Jewish schools, 2018/19 to 2020/21](#), 8 December 2021

Annex 2 – Data analysis and methodology

- The following four data sources have been reviewed to inform this assessment. As noted in this paper, readily available] data on the independent/private school sector is limited.
 - **DfE data:** Provides a count of all independent schools, and their pupil numbers; and breakdown by borough and faith/non-faith category. This does not provide any further breakdown to determine whether they are mainstream private, private faith or neither (such as the Charedi community). The data on the ‘religious character’ of the school is limited. The DfE’s breakdown the DfE extends only to ‘Jewish’ and ‘other Jewish faith’; no further breakdown is available.
 - **Ofsted data:** The GLA has reviewed five years’ worth of Ofsted data on school inspections for private schools.

Whilst this data does list the actual school names and their unique reference number, there are some key gaps/caveats, namely the following:

- a. Not all schools are inspected in the London data. A count of 212 schools show that they were inspected between September 2023 and April 2024. Ofsted itself notes that the total number of schools inspected is usually quite a bit less than the total number of schools (usually around 50 per cent less).
- b. Ofsted data does not give further breakdown (including details of fees).
- **ISC:** The ISC has [a directory of independent schools in London by borough](#). This provides their pupil numbers, denomination and termly fees. However:
 - a. not every independent school is a member of ISC (it may only be 50 per cent)
 - b. there is no readily accessible data to allow further analysis.
- **Independent school search service:** The Schoolsearch website has an [online directory showing independent schools in Greater London](#). The data is not presented in a readily accessible format to allow further analysis.

Data overview

- Analysis of the independent schools sector in London primarily uses DfE datasets based on information for the January 2023-24 School Census (henceforth, DfE data).⁸
- The DfE data breaks down independent schools in London only by certain characteristics – notably the age of their pupils and the school’s religious character (see **Figure 1** in **Annex 2**).

⁸ DfE, [Academic year 2023/24: Schools, pupils and their characteristics](#)

Gaps and limitations

- Unlike state schools, the DfE data does not include the rates of FSM eligibility for independent schools.
- Data on uptake rates for these pupils is not available, unlike data for those in state-funded primary schools.
- The DfE data for independent schools is also categorised by age of pupils. **Annex 2, Figure 1**, shows data for pupils aged 7-11. Nevertheless, this does not entirely correspond to KS2 pupils in Years 3-6, which represents another limitation.
- Income profiles of the households to which the pupils in independent schools belong are also missing. It is therefore not possible to ascertain whether these pupils are necessarily more or less likely to be eligible for the government's offer of FSM.
- Data is also lacking for catering costs at independent schools, which are likely to differ from those at state-funded primary schools. Moreover, independent faith-based schools could have different costs themselves, due to any food preparation requirements relating to faith.
- There is no available data on the proportion of pupils with religious beliefs attending multi-faith independent schools. This is also the same for the whole school sector.
- There are some unregulated schools in London – almost a quarter (23 per cent) of the settings investigated across England are in London. AP is amongst the most common type of unregistered settings that have been investigated (28 per cent). Around a quarter (26 per cent) of the settings are general education providers, and a fifth (21 per cent) are places of religious instruction.⁹

⁹ DfE, [Unregistered schools management information](#), published 15 March 2018 and updated 8 May 2024

Annex 2: Figure 1 (Pivot Table)

This pivot table shows the number of pupils aged 7-11 attending independent schools in each borough during the 2023-24 academic year. It is further broken down by religious denomination.

41	Total pupils aged 7-11 in independent schools by faith												
42	Local Authority	Anglican	Church of England	Free Church	Islam	Jewish	Methodist	Muslim	No religious character	Other Christian Faith	Other Jewish Faith	Roman Catholic	Total
43	Barking and Dagenham								58				58
44	Barnet				66	44			2168		213		2491
45	Bexley		157						191				348
46	Brent				19				713				732
47	Bromley			358			180		925	173		85	1721
48	Camden		358						2812			407	3577
49	City of London		154						382				536
50	Croydon		69						1757				82
51	Ealing								1193				1516
52	Enfield								541				49
53	Greenwich								1210				1210
54	Hackney				24	351			2510		1506		4391
55	Hammersmith and Fulham		117		47				2029				2193
56	Haringey								532	661			1193
57	Harrow		147						1049				1196
58	Havering								157	91			248
59	Hillingdon				20				1554				1574
60	Hounslow								703				703
61	Islington								261				261
62	Kensington and Chelsea		153						3762			73	3988
63	Kingston upon Thames								970	499			1469
64	Lambeth								795				795
65	Lewisham		364						349				713
66	Merton		427						985			239	1651
67	Newham							67	316	19			402
68	Redbridge		132					53	1123			49	1357
69	Richmond upon Thames		698						2692	170		127	3687
70	Southwark								1497	62			1559
71	Sutton								672				672
72	Tower Hamlets								844				844
73	Waltham Forest		370		103			28	98				599
74	Wandsworth				24				3376	711			4111
75	Westminster	24	479						2223			245	2971
76													
77		24	3625	358	303	395	180	148	40447	2386	1719	1679	51264

Annex 3: Independent schools sector in England – technical detail

Background

- An 'independent school' is defined by the DfE as a school that is either:
 - not maintained by a local authority
 - not a non-maintained special school

and at which full-time education is provided for either

- five or more pupils of compulsory school age
- at least one pupil of that age who is looked after by a local authority (within the meaning of section 22 of the Children Act 1989); or that has either a statement of special educational needs, or an education, health and care plan.

Regulatory framework

- The DfE, through the Secretary of State, acts as the regulator for independent schools in England. The DfE registers independent schools; sets independent school standards that those schools must meet; commissions inspections against those standards; and acts where schools fail to meet the standards.
- Independent schools in England must be registered by the Secretary of State for Education, the independent school's regulator, before operating. It is a criminal offence to conduct an independent school that is not registered. If convicted, a person could be subject to an unlimited fine and/or imprisonment for up to six months.
- Independent schools, including independent faith schools, do not have to teach the national curriculum; but they must meet minimum standards set out in regulations. These include standards relating to the quality of the curriculum, which must be broad and balanced; allow children to make progress; and include lessons in written and spoken English.

Unregistered schools in England and London

- In law, an 'independent school' is an institution that is not a local authority-maintained school, or a non-maintained special school. It must provide full-time education to children of compulsory school age, or to one child who is looked after by the local authority or has an education, health and care plan. The setting must operate from a building; and must offer a curriculum that includes maths and English.
- An unregistered school is an educational establishment that meets the legal definition of an independent (private) school, but is not registered with the DfE. It is against the law to run an independent school unless it's registered with the DfE, which is the regulating body for this kind of school.

- In 2019, Ofsted estimated that as many as 6,000 children in London are being educated in unregistered school settings.¹⁰
- Almost a quarter (23 per cent) of the unregistered schools Ofsted inspected were in London, with the rest evenly spread across the country. A fifth (21 per cent) were faith schools, including 36 Islamic, 18 Jewish and 12 Christian schools.
- Further robust data on unregistered schools is lacking. However, a briefing on Jewish Independent Schools identifies a significant problem with Orthodox Jewish boys leaving the regulated school system at 13, and being educated in unregistered yeshivas. About 1,000 boys aged 13-16 in Hackney alone are thought to be 'missing' in this sense.¹¹

¹⁰ Ofsted, [Unregistered school management information](#), published 15 March 2018 and updated 8 May 2024

¹¹ [Extract from the briefing for the meeting with Rabbi Baumgarten on the curriculum in Jewish orthodox schools](#), 10 September 2020

Greater London Authority (GLA)

Universal Free School Meals (UFSM)

Equality Impact Assessment – refresh June 2024



This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party, and no responsibility is undertaken to any third party.

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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
EqlA	Equality Impact Assessment
FSM	Free school meals
GCSE	General Certificate of Secondary Education
GLA	Greater London Authority
IIA	Integrated Impact Assessment
IMD	Index of Multiple Deprivation
LGBTQ+	Lesbian, gay, bisexual, transgender, queer (or sometimes questioning) and others. The "plus" represents other sexual identities, including intersex, asexual, pansexual and Two-Spirit.
NRPF	No recourse to public funds
NS-SeC	National Statistics Socio-economic Classification
LA	Local authority
LB	London borough
LLW	London Living Wage
MHCLG	Ministry of Housing, Communities and Local Government
ONS	Office for National Statistics
PSED	Public Sector Equality Duty
SEND	Special educational needs and disabilities
SEN	Special education needs
TP	Transitional protections
UFSM	Universal free school meals

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	This refers to the scheme of FSM that are funded by the national government in state-funded primary schools.

Terms	Definition
Integrated Impact Assessment	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.
Key Stage 2	A phase of primary education for pupils aged 7 to 11 in England.
No recourse to public funds	No entitlement to the majority of welfare benefits including income support, housing benefits and a range of allowances and tax credits.
Protected characteristics	Nine groups identified in the Equality Act 2010 as sharing a particular characteristic against which it is illegal to discriminate: <ul style="list-style-type: none"> • Age; • Disability; • Gender reassignment; • Marriage and civil partnership; • Pregnancy and maternity; • Race; • Religion or belief; • Sex; and • Sexual orientation.
Public Sector Equality Duty (PSED)	This requires public authorities in exercising their functions, to have due regard to the need to: <ul style="list-style-type: none"> • eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010; • advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it; • foster good relations between people who share a relevant protected characteristic and people who do not share it.
Pupil premium	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 FSM for has claimed FSM in the last six years, their school receives financial income.
Special educational needs and disabilities (SEND)	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 UFSM is being applied (across all London boroughs (LBs)). It is used as a geographical basis for reporting local community impacts and effects.
Transitional protections (TP)	The transitional protections (TP) policy was introduced in 2018 to protect those eligible for FSM from becoming ineligible while universal credit is being rolled out. This was originally set to last until March 2022 and was subsequently extended to March 2023. The end date for protections has now been extended further until March 2025.
Universal free school meals (UFSM)	This refers to the Mayor of London's scheme to ensure the provision of FSM to all children in state-funded primary schools in London.

Executive summary

In February 2023, the Mayor of London announced £130m of funding to give all primary-school children in London's state-funded schools free school meals (FSM) for the 2023-24 academic year. In January 2024, the Mayor of London announced his intention to continue to deliver the Universal Free School Meals (UFSM) scheme to London primary state-funded schools (including state-funded through schools, academies and state-funded special schools and alternative provision) in the 2024-25 academic year. £140m was allocated in his provisional budget and subsequently approved in Mayoral Decision (MD) 3224 on 18 January 2024.

The UFSM scheme continues to benefit primary-school children in state-funded schools, saving families in London over £500 per child across the year. The aim of the scheme is to help families with the spiraling cost of living, to build a better and more prosperous city for all Londoners.

This Equality Impact Assessment (EqIA) was published in 2023. It was updated in spring/summer 2024 to ensure that key considerations were taken into account in the Mayor's decision to extend UFSM.

The EqIA aims to systematically identify and assess the impacts and effects of UFSM, both positive and negative; and to identify how to mitigate any negative effects, or enhance any positive effects, for people sharing one or more protected characteristics, as defined by the Equality Act 2010. These protected characteristics are; age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. Socio-economic inequality is not a protected characteristic under the Equality Act; however, the assessment has considered the potential effects of the strategy for people on this basis.

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

- In relation to the protected characteristic of age, positive benefits are anticipated for nutrition; mental health and wellbeing; and academic learning and attainment. This would bring most benefits to the recipient age group (7-11); but benefits will likely extend beyond this group, bringing benefits to other family members (including older and younger children, and parents) by freeing up financial resources to spend on food for other family members. This is being independently evaluated as part of the UFSM monitoring and evaluation strategy. Insights gathered throughout year one, such as parent polling and interviews with headteachers, show that the policy is having this benefit for families, and we will continue to explore this impact over the course of year two.
- Year one of UFSM has shown benefits for children's social interaction. The expected benefits for mental health 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 group, proportionally more likely to be eligible for FSM and therefore more likely to be subject to the stigma associated with this.
- Pupil premium application analysis in May 2024 show no significant shift in the average number of applications in London this academic year (since UFSM was introduced). However, there are some fluctuations at a borough level: 15 boroughs saw an increase in pupil premium applications and 18 saw a decrease. Furthermore, in March 2025 transitional protections (TP) will end.¹ The implication is that many families will need to reapply for pupil premium, when they otherwise would have not done so. Failure to do so could mean state-funded schools in England miss out on funding support to improve educational outcomes for disadvantaged pupils.

¹ The TP policy was introduced in 2018 to protect those eligible for FSM from becoming ineligible while universal credit is being rolled out. This was originally set to last until March 2022 and was subsequently extended to March 2023. The end date for protections has now been extended further until March 2025.

- The GLA is taking a proactive role to support boroughs to inform schools about this change. The GLA will also continue to monitor uptake of pupil premium applications. This includes uptake of national FSM as the policy is implemented.
- For those still struggling with the cost-of-living crisis or living in relative poverty, but who do not meet current eligibility criteria, universal provision will continue helping 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 UK means that many families living in relative poverty are not eligible for FSM under the current government criteria.
- FSM may have benefits for improving attendance, through both reducing health-related absence and providing a motivating factor in a free lunch.
- This EqIA also identifies areas for further work or consideration with regard to the policy. Some of these recommendations related to the first year of the policy; others relate to potential for learning from year one, or longer-term considerations. These include the following:
 - The extent to which concerns about whether UFSM is meeting 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.
 - The price per meal has also been uplifted in year two to £3.00 per meal; and Kosher food for children attending state-funded Jewish schools has been topped up again to £3.85 to account for the higher cost of Kosher food. In year one, a top-up fund for Kosher food and special educational needs and disabilities (SEND) schools is being provided.
 - The funding grant conditions and principles continue to ask boroughs to ensure that meals adhere to the national school food standards and that it is culturally appropriate.
 - The UFSM monitoring and evaluation strategy will ensure this is monitored by looking at take-up of meals across all groups.
 - Dietary needs and requirements, and price point, for meals for children with SEND and SEND schools, remain higher. The GLA is seeking to address this in year one via a top-up fund for SEND schools; this will be closely monitored in year two.
- Concerns remain around the extent to which UFSM will reduce the numbers eligible for nationally provided FSM actually signing up for the government scheme. This could impact on pupil premium, with potential repercussions for schools' financial resources to improve the educational outcomes for disadvantaged pupils. The GLA will be imposing grant conditions in year two to encourage consideration of best practice in promoting registration (and the benefits to schools). This includes models where all parents are required to complete registration, which would capture those eligible for FSM and pupil premium. This will be supported by the GLA through a range of measures and support packages.

1. Introduction

1.1 Purpose of the report

To undertake an EqIA is to systemically identify and assess the potential impacts of the design and implementation of a proposed plan, policy, project or strategy for people sharing one or 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
- 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 neither low income nor socio-economic inequality are identified 'protected characteristics' under the Act in England, low-income groups have been included as part of this assessment. This is 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. It 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; secure the potential benefits, and promote equality of opportunity.

An EqIA is an ongoing process. It will be reviewed and updated throughout the delivery of the scheme to: reflect any challenges or opportunities that emerge; and ensure that the plan development takes account of any key equality issues raised by stakeholders and local communities. This document was last updated in June 2024, ahead of the roll-out of year two of the policy.

1.2 The policy

Year one (2023-24 academic year)

In year one, the Mayor of London announced £130m of emergency funding to provide all KS2 children in London's state-funded primary schools with UFSM for the 2023-24 academic year. This emergency funding will help 287,000 extra primary-school children, and save families in London upwards of £440 per child across the year. The aim of the scheme is to help families with the spiralling cost of living.

Meals were funded at the standardised rate of £2.65, as a single standard offer across all boroughs. Before this, there was a wide variance in FSM unit costs – including where there is already a universal offer across and within London boroughs. There are many drivers for this variance, including paying London Living Wage (LLW) to school staff; adherence to healthy food standards above and beyond the school food standards; and the scope and status of current contracts for catering provision. The £2.65 price per meal for the UFSM London scheme was a single flat rate in line with the approach taken by government; this was above the standard government rate of £2.41.

Grant funding is allocated on an assumed 90 per cent uptake. However, boroughs evidencing a higher uptake could claim additional funding.

In response to findings from the EqIA, additional funding was made available to cover the higher price of Kosher meals. In this case, £3.50 per meal was provided to Jewish state-funded schools. Any

exceptional costs arising for state-funded special schools were also covered, to support the higher cost of meals for pupils with SEND, where needed.

Year two (2024-25 academic year)

In January 2024, the Mayor announced his intention to continue delivering the UFSM scheme to London state-funded primary schools (including schools, academies, special schools and alternative provision) in the 2024-25 academic year. £140m was allocated in his provisional budget; and approved in MD3224 on 18 January 2024.

To continue to support delivery of the scheme, the policy extension for 2024-25 will raise the meal price from £2.65 to £3.00.

As with year one, additional funding will be made available to cover the higher price of Kosher meals at an increased rate of £3.85 per meal for Jewish state-funded schools. Any exceptional costs arising for state-funded special schools will also be covered, to support the higher cost of meals for pupils with SEND, where needed.

Funding continues to be allocated to the five LBs that had funded FSM to their London primary state-funded schools in 2022-23 (i.e., before the Mayor's scheme), as if they had not done so.

Each borough will retain the opportunity to secure additional funding, if they can evidence that uptake of the scheme has exceeded the assumed take-up rate of 90 per cent (i.e., the level at which they have been funded). Evidence from the scheme's first year suggests take-up of between 80 and 89 per cent, and about 83 per cent on average. This early insight highlights the scheme's success in the first school term. Ongoing monitoring and research with schools will investigate this further in terms two and three of 2023-24.

Grant terms and conditions will continue to require that funding is spent on delivery and implementation of the scheme. Minor changes will be made to the grant terms and conditions, effective from September 2024. Changes will be kept to a minimum to mitigate extra burden on schools; but will include a request for boroughs to consider adoption of good practice related to auto-enrolment.

The Mayor's UFSM policy is consistent with the government's existing funding of school meals, as outlined in Department for Education (DfE) guidance.² Namely, it covers state-funded primary schools, pupil referral units and special schools (including maintained schools, academies and free schools (including faith schools)); but not private or independent schools. The GLA acknowledges that there are some communities within London whose children largely attend private settings or independent schools, and who will therefore not benefit from this funding.

Engagement and analysis highlighted a need to further investigate the potential impact of the policy on schools across the whole education sector, including independent schools. This additional analysis has been conducted by the GLA and can be found as Annex C of the UFSM Integrated Impact Assessment³. This analysis was initially completed in June 2023 to ensure all considerations were made in the policy development of the Mayor's UFSM scheme. It was updated in June 2024 to inform the extension and ongoing delivery of the UFSM scheme. Ultimately, UFSM funding is a limited pot of money that cannot extend to every child in London. This is partly why the policy has prioritised children in state schools above those in schools that charge fees, or receive alternative income, that could be used to pay for meals.

The UFSM scheme is just one measure within a range of steps the Mayor is taking to help Londoners deal with the cost-of-living crisis. For example, in April 2023, the Mayor launched the Free Holiday Meals programme. This made £3.1m available in grant funding to the Felix Project and the Mayor's Fund for London, to increase surplus food and meal provision to families needing

² DfE, [Free School Meals: Guidance for local authorities, maintained schools, academies, and free schools](#), March 2024.

³ GLA, [UFSM Integrated Impact Assessment](#), 2023

support during the school holidays. Separately, and in response to the heightened demand for food aid across the year, the Felix Project received £425,000 to enable all four of its warehouses to deliver food on Saturdays as well as during the week. In this way, it was able to address urgent gaps in weekend food deliveries throughout 2023-24. In total, the combined funding resulted in the equivalent of more than 12.4m holiday and weekend meals delivered over 12 months.

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

1.3 Background

All state-funded school children in England at KS1 (reception to Year 2) receive FSM. Prior to the introduction of the Mayor's UFSM scheme in September 2023, FSM was only available to KS2 children (years 3-6) that met specific eligibility criteria. This is no longer the case, because through the Mayor's UFSM scheme all KS2 children in London's state-funded primary schools receive FSM.

Research by the Child Poverty Action Group (CPAG)⁴ has shown that hundreds of thousands of schoolchildren live in poverty, but are not currently eligible for FSM.

Currently, to be eligible for FSM, 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. 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 (LA), or via their child's academy school, to claim FSM for KS2 children. In 2013 government estimates on claim rates indicated that around 11 per cent of school children eligible for FSM had not taken up the offer.⁵

In March 2025, TP will end. Currently, pupils with eligibility on or since 1 April 2018 still receive FSM – even if their household is no longer eligible under the benefits/low-earnings criteria. This will be the case until March 2025, and remain so until the end of the pupil's phase of education.

However, those newly applying for FSM on or after 1 April 2018, who are in receipt of universal credit and have earnings above the earned-income threshold, will not be eligible for FSM. The implication of TP ending is that many families will need to reapply for pupil premium, when they otherwise would have not done so. Failure to do so could impact school budgets.

Historically, families who were undocumented due to their immigration status, and/or have no recourse to public funds (NRPF) (i.e., no entitlement to most 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-19; in January 2023, this was permanently extended to all households with no NRPF.

Government guidance

National government guidance has recently been updated, regarding the policy position for children receiving education otherwise than at school (EOTAS). The national guidance states: "**No specific provision is made in legislation** for FSM to be provided to children who are in receipt of EOTAS."⁶

However, the guidance says that the **government expects LAs to consider making equivalent**

⁴ CPAG, [New official data shows 900,000 children in poverty don't qualify for free school meals under national policy](#), June 2024.

⁵ DfE, [Pupils not claiming Free School Meals – 2013](#), December 2013.

⁶ DfE, [Free School Meals: Guidance for local authorities, maintained schools, academies and free schools](#), March 2024.

food provision for children who are receiving EOTAS, and who meet both of the following criteria:

- the child would meet the benefits-related criteria for FSM if they were in a state-funded school
- the meals would be provided in conjunction with education; and would, in line with the aim of FSM provision, be for the purpose of enabling the child to benefit fully from the education being provided.

The updated guidance states:

“In considering their approach to making food provision for relevant children, and in making decisions on particular cases, local authorities should act in accordance with the Human Rights Act and the European Convention on Human Rights and comply with the public sector equality duties.”

The guidance also outlines the legal duty on schools to make reasonable adjustments for disabled children on their rolls. It states:

“Schools are best placed to determine the exact nature of a reasonable adjustment in relation to food provision, taking into account the individual circumstances of the child and their family, as well as schools’ obligations under the school food standards.”

A food voucher would be deemed a reasonable adjustment. Schools are not obliged to make reasonable adjustments for children who are not disabled. However, schools should take “appropriate action” to support pupils with medical conditions, including a food allergy.

In light of recent government guidance, the GLA’s policy therefore has been updated to say that it will be the responsibility of the LA to consider these instances on a case-by-case basis.

2. EqlA methodology

2.1 Approach to the assessment

An EqlA is a qualitative assessment that 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, this 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 socio-economic status.

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

2.2 Study area

The study area includes the whole of the Greater London Area, covering all 33 LAs:

- | | | |
|-----------------------|--------------------------|--------------------------|
| 1. Barking & Dagenham | 12. Hackney | 23. Lewisham |
| 2. Barnet | 13. Hammersmith & Fulham | 24. Merton |
| 3. Bexley | 14. Haringey | 25. Newham |
| 4. Brent | 15. Harrow | 26. Redbridge |
| 5. Bromley | 16. Havering | 27. Richmond upon Thames |
| 6. Camden | 17. Hillingdon | 28. Southwark |
| 7. City of London | 18. Hounslow | 29. Sutton |
| 8. Croydon | 19. Islington | 30. Tower Hamlets |
| 9. Ealing | 20. Kensington & Chelsea | 31. Waltham Forest |
| 10. Enfield | 21. Kingston upon Thames | 32. Wandsworth |
| 11. Greenwich | 22. Lambeth | 33. Westminster |

These LAs are mapped in **Figure 1**, below.

Figure 1: LAs 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)⁷
- the London Health Inequalities Strategy (2018)⁸
- the Mayor's Equality, Diversity and Inclusion Strategy (2018)⁹
- the London Plan (2021)¹⁰
- the London Environmental Strategy (2018).¹¹

Key considerations relevant to the assessment of equalities effects include:

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

If any of the above strategies are updated as part of the new mayoral term, these will be reviewed and this document will be updated on an ongoing basis.

2.4 Assumptions and limitations

The following assumptions and limitations apply to this EqIA:

- The 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 have highlighted a need to further investigate the potential impact of the policy on schools across the whole education sector, including independent schools. This additional analysis has been conducted by GLA Economics; the full assessment 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 the COVID-19 lockdown, and respondents were asked to complete the census based on where they were living at that moment. Therefore, it may therefore not accurately reflect London's current demography.
- With regard to faith, the assessment has focused on key faiths for which census data on prevalence is available – including Christian, Muslim, Hindu, Buddhist, Sikh and Jewish faiths. However, this EqIA acknowledges that, while available datasets on faiths and religious communities are incomplete, other faiths outside of those listed in the EqIA also exist; and members of these communities may have specific dietary needs associated with their beliefs.

⁷ GLA, [The London Food Strategy](#), December 2018.

⁸ GLA, [The London Health Inequalities Strategy](#), September 2018.

⁹ GLA, [The Mayor's Equality, Diversity and Inclusion Strategy](#), May 2018.

¹⁰ GLA, [The London Plan 2021](#), March 2021.

¹¹ GLA, [London Environmental Strategy](#), May 2018.

3. Baseline profile

3.1 Population

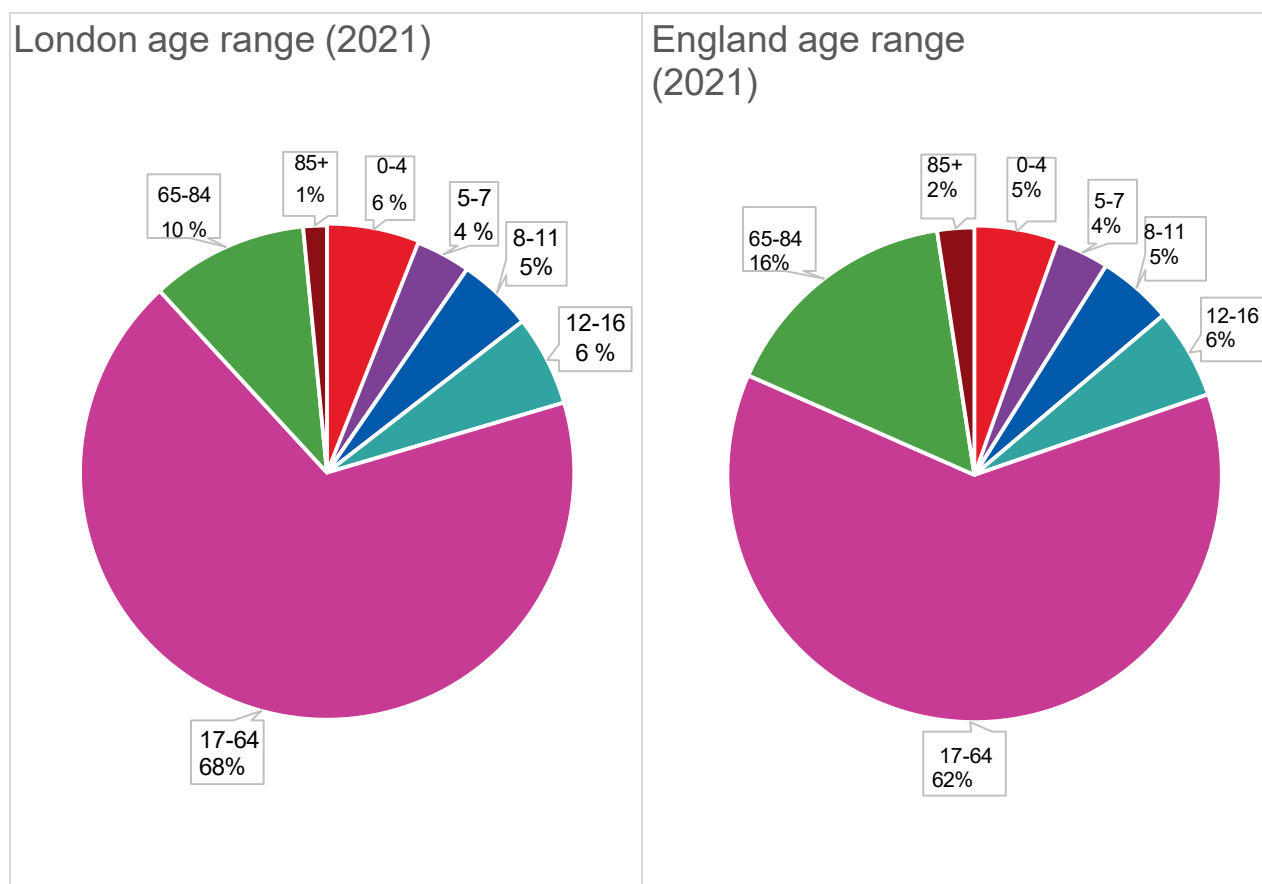
London's population is just under 8.9m.¹² According to the GLA's population projections, published in 2023, this number is expected to rise to about 10m by 2040.¹³ This positive trend is consistent across every LB, although there will be more growth in some than in others. Between 2021 and 2040, Barking and Dagenham's population is projected to increase the most (39%); and Westminster's population is projected to drop by less than 1 per cent.

The projected increase in London's population is not consistent across different age groups. The proportions of 16-64-year-olds, and those 65 and over, are expected to increase; but the proportion of 0-15-year-olds is expected to decrease,¹⁴ 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. However, London has a higher proportion of 17-64-year-olds, and a lower proportion of 65-84-year-olds, than England.

Figure 2: Population age breakdown



3.3 Disability

The Index of Multiple Deprivation (IMD) health deprivation and disability domain measures the risk of premature death, and the impairment of life quality, through ill health or disability. **Figure 3**

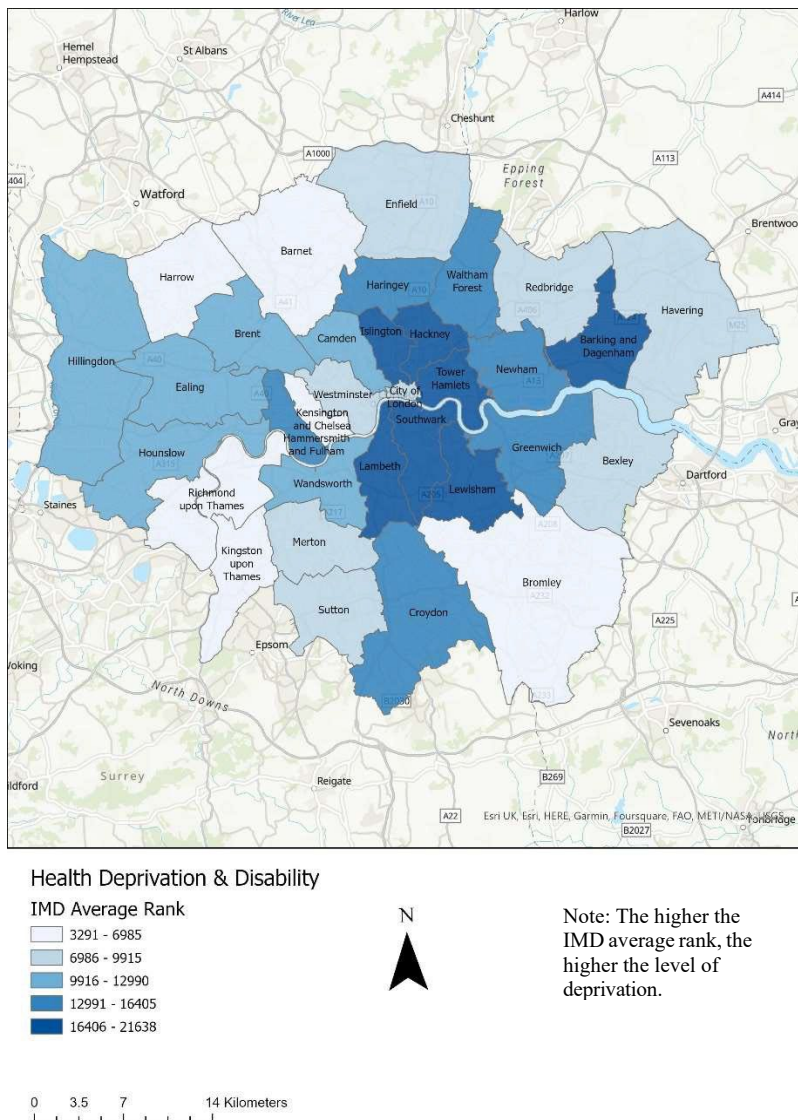
¹² ONS [mid-year estimates, 2022: sex by single year of age](#)

¹³ GLA Datastore, [Housing-led population projections](#), 2023.

¹⁴ GLA Datastore, [Housing-led population projections](#), 2023.

indicates that Barking and Dagenham, Lambeth, Southwark, Lewisham, Tower Hamlets, Hackney, and Islington are relatively deprived in terms of health and disability.¹⁵

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



3.3.1 SEND schools in London

Across London there are 160 state-funded SEND schools,¹⁶ attended by a total of 22,054 children. In 2021-22, London had 1,332 SEND pupils in Year 3; 1,360 in Year 4; 1,365 in Year 5; and 1,342 in Year 6. For Years 3-5 the highest recorded numbers were in Croydon; for Year 6, the highest recorded number of pupils was in Hillingdon.

3.3.2 FSM for children at SEND schools

Based on the 2024 national statistics for special educational needs (SEN) in England,¹⁷ 40 per cent of children in London's state-funded schools with SEN support and an education, health and care plan (EHCP) are eligible for FSM. This is slightly below the national average at 39 per cent. The highest percentage of FSM-eligible SEND children is found in Islington, at 57 per cent. The lowest is seen in City of London, at 23 per cent, followed by Richmond upon Thames at 26 per cent.

¹⁵ MHCLG, [Indices of Deprivation: Health Deprivation and Disability](#), 2019.

¹⁶ DfE, [Academic year 2023-24: Special education needs in England](#), 20 June 2024.

¹⁷ DfE, [Academic year 2023-24: Special education needs in England](#), 20 June 2024.

According to a DfE 2022 publication,¹⁸ eligibility for FSM in children with SEND was 20 per cent higher than for those without SEND.

3.3.3 SEND and ethnicity

The majority of SEND pupils in state-funded primary schools (all years, excluding ‘unclassified’¹⁹) in London identify as White (40 per cent).²⁰ This is followed by pupils who identify as Black (20 per cent), Asian (20 per cent), Mixed (14 per cent) and Other (6 per cent). These figures, along with LA-specific data, are presented in **Table 1**, below, and exclude the ‘unclassified’ category.

Table 1: The number of SEND pupils (SEN support or EHCP) by ethnicity in state-funded primary schools across London (2023-24)

LA	White	Mixed	Asian	Black	Any other ethnic group
London	46,294 (40 per cent)	15,692 (14 per cent)	22,750 (20 per cent)	23,327 (20 per cent)	7,016 (6 per cent)
Barking & Dagenham	1,510	428	1,159	1,018	63
Barnet	2,556	626	592	645	602
Bexley	2,180	379	316	553	36
Brent	1,083	416	988	1,006	613
Bromley	3,000	595	271	443	63
Camden	726	315	440	370	127
City of London	16	12	30	7	5
Croydon	1,845	936	704	1,527	108
Ealing	1,306	559	1,241	794	833
Enfield	2,390	583	285	1,153	260
Greenwich	2,288	706	532	1,432	119
Hackney	1,165	537	396	1,395	222
Hammersmith & Fulham	637	316	142	413	189
Haringey	1,527	476	227	904	260
Harrow	837	300	1,255	249	173
Havering	2,205	333	435	403	40
Hillingdon	2,049	649	1,174	432	321
Hounslow	1,533	447	1,357	462	447
Islington	1,262	584	204	713	212
Kensington & Chelsea	427	275	47	251	206

¹⁸ DfE, 2022. Special educational needs and disability: an analysis and summary of data sources. Available online at: https://assets.publishing.service.gov.uk/media/64930eef103ca6001303a3a6/Special_educational_needs_and_disability_an_analysis_and_summary_of_data_sources.pdf

¹⁹ Unclassified in the data means that the ethnicity is unknown.

²⁰ DfE, [Academic year 2023-24: Special education needs in England](#), 20 June 2024.

LA	White	Mixed	Asian	Black	Any other ethnic group
Kingston upon Thames	1,409	306	310	77	119
Lambeth	1,004	627	145	1,613	199
Lewisham	1,445	782	239	1,429	158
Merton	1,289	388	548	402	69
Newham	834	444	2,362	1,069	222
Redbridge	1,041	417	1,943	460	59
Richmond upon Thames	1,506	292	191	70	65
Southwark	1,305	640	248	1,689	306
Sutton	1,767	365	465	222	66
Tower Hamlets	870	525	2,910	458	134
Waltham Forest	1,624	607	891	676	150
Wandsworth	1,285	613	517	739	165
Westminster	373	214	186	253	405

3.3.4 SEND and links to poverty

The Joseph Rowntree Foundation published research in 2016 examining the links between SEND and poverty in the UK.²¹ DfE statistics provided in the report show clear links between SEND and children living in poverty. Of the pupils who are eligible for FSM in England,²² 28.7 per cent are identified as having SEND. The prevalence of SEND is higher among FSM-eligible pupils than ineligible pupils.

The report also identified that children with SEND are six times more likely to be excluded than those who do not have SEND; and that 74 per cent of all permanently excluded pupils have some form of identified SEND. There are clear links with poverty too:

- children in receipt of FSM are four times more likely than their peers to be excluded
- the exclusion rate in schools with the highest intake of children from low-income families is more than 40 per cent higher than in schools with the least disadvantaged intake.

A report by the Department for Work and Pensions (DWP) found that people living in families with disabled children were more than twice as likely to be living in poverty than those where no one had a disability.²³

3.4 Ethnicity

3.4.1 London's ethnic profile

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,

²¹ Joseph Rowntree Foundation, [Special educational needs and their links to poverty](#), 26 February 2016.

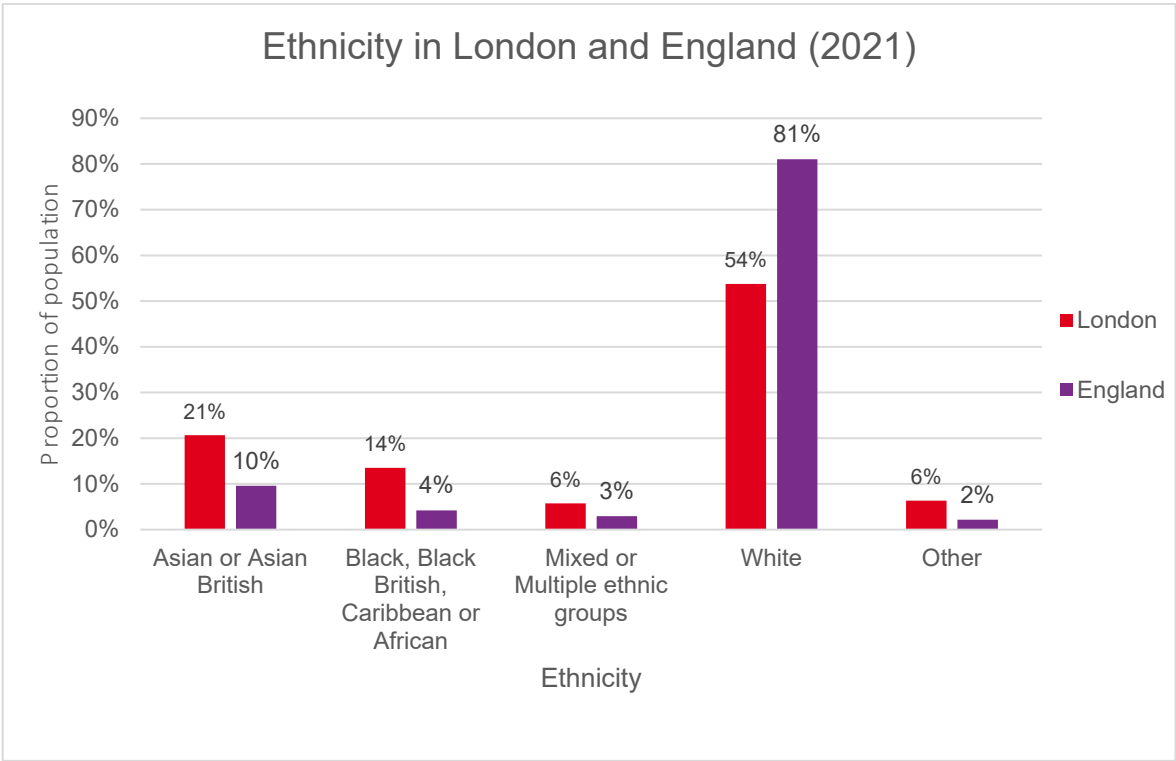
²² Eligibility for FSM is a commonly used proxy for children living in poverty, albeit with widely recognised weaknesses.

²³ Official Statistics, [Below Average Resources: developing a new poverty measure](#), published 18 January 2024, updated 11 June 2024.

in particular for at-risk groups such as children from Gypsy, Roma and Traveller communities.

As shown in **Figure 4**, London is more ethnically diverse than England. At 54 per cent, the proportion of individuals identifying as White in London is much lower than the English average of 81 per cent. A larger proportion of the population in London identify as Asian, Black, mixed and/or other,²⁴ compared to the rest of England.

Figure 4: Ethnicity in London and England



3.4.2 Primary school pupil ethnicity

According to 2023-24 school year data,²⁵ the majority of state-funded primary school pupils (all years, excluding ‘unclassified’) in London identify as White (272,116 pupils (40 per cent)), followed by Asian (168,260 (25 per cent)), Black (108,359 (16 per cent)), mixed (85,481 (13 per cent)) and then ‘any other ethnic group’ (43,614 (6 per cent)).

²⁴ ONS, [Ethnic group](#), 2021.

²⁵ DfE, [Academic year 2023-24: Schools, pupils and their characteristics](#), published 6 June 2024, updated 10 June 2024.

Table 2: Pupil ethnicity in state-funded primary schools in London (2023-24)

LA	White	Mixed	Asian	Black	Any other ethnic group
London	272,116 (40 per cent)	85,481 (13 per cent)	168,260 (25 per cent)	108,359 (16 per cent)	43,614 (6 per cent)
Barking & Dagenham	7,705	2,203	8,428	5,320	506
Barnet	15,475	3,385	4,330	2,755	3,609
Bexley	12,770	2,292	3,227	3,509	364
Brent	6,936	2,125	8,446	4,394	3,889
Bromley	17,371	3,763	2,951	2,567	509
Camden	4,054	1,525	2,132	1,542	738
City of London	65	43	104	15	17
Croydon	10,795	5,408	6,418	8,120	815
Ealing	8,455	3,106	9,311	3,459	5,424
Enfield	15,179	3,600	2,448	5,508	1,731
Greenwich	10,397	3,427	3,155	6,933	767
Hackney	6,457	2,486	2,110	5,359	1,169
Hammersmith & Fulham	3,734	1,532	820	1,717	1,148
Haringey	10,257	2,873	1,448	3,935	1,674
Harrow	5,958	1,790	11,391	1,322	1,076
Havering	15,243	2,365	4,310	2,583	341
Hillingdon	9,700	3,858	10,058	2,422	2,522
Hounslow	7,100	2,175	8,984	1,981	2,463
Islington	5,755	2,593	1,004	2,794	943
Kensington & Chelsea	2,554	1,344	351	1,004	1,059
Kingston upon Thames	7,824	1,767	2,606	409	841
Lambeth	6,382	3,177	1,004	6,830	1,126
Lewisham	8,480	4,095	1,693	6,257	905
Merton	8,058	2,233	3,842	1,684	509
Newham	6,039	2,684	17,651	5,443	1,760
Redbridge	7,327	2,535	15,849	2,134	460
Richmond upon Thames	10,895	2,108	1,959	343	524
Southwark	6,531	3,128	1,437	7,424	1,686
Sutton	9,697	2,072	5,082	1,222	497

LA	White	Mixed	Asian	Black	Any other ethnic group
Tower Hamlets	3,582	2,275	15,929	1,883	732
Waltham Forest	10,942	3,440	5,538	3,318	907
Wandsworth	8,166	2,949	3,047	3,020	816
Westminster	2,233	1,125	1,197	1,153	2,087

3.4.3 Socio-economic classification by ethnic group

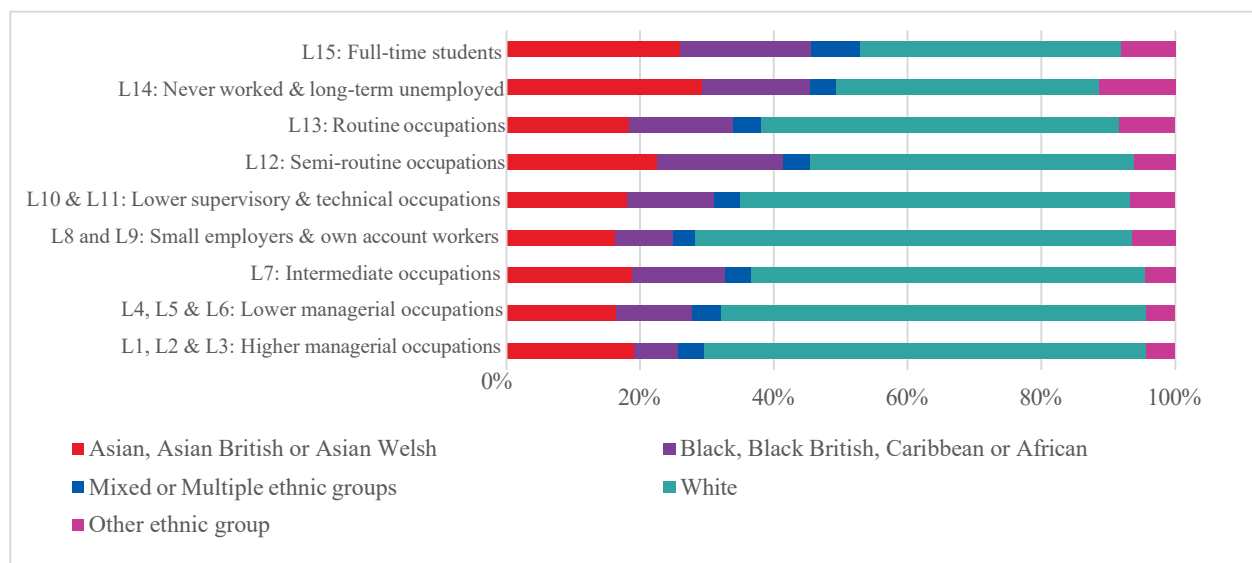
The Office for National Statistics (ONS) provides data on National Statistics Socio-economic Classification by Ethnic Group (NS-SeC).²⁶

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

3.5 Religion or belief

3.5.1 London's religious/belief profile

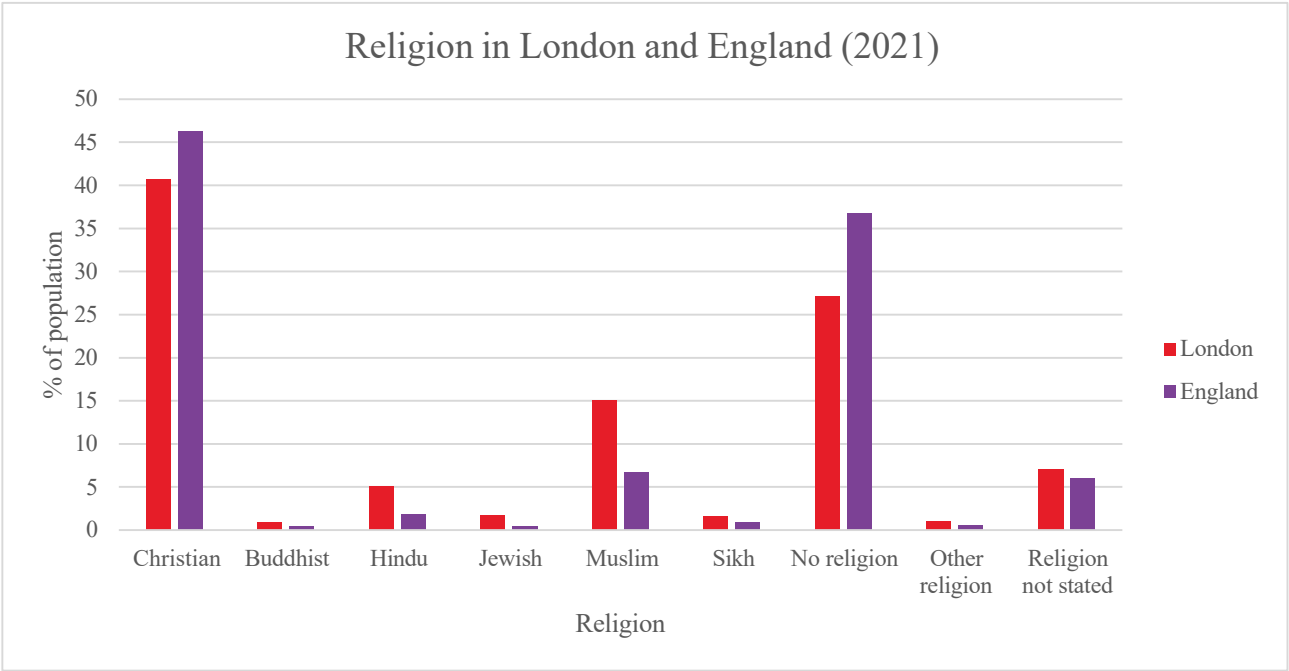


In terms of religion, **Figure 6** indicates that, at the time of the 2021 Census, the most common religion in London and England was Christian – with a slightly lower percentage in London compared to England.²⁷ In both cases, there are relatively high levels of those who identify as having no religious faith. The percentage of individuals identifying as either Buddhist, Hindu, Jewish, Muslim, Sikh or 'Other' religion is relatively high in London.

²⁶ ONS, [NS-SeC by ethnic group by sex by age](#), 2021.

²⁷ ONS, [Religion](#), 2021.

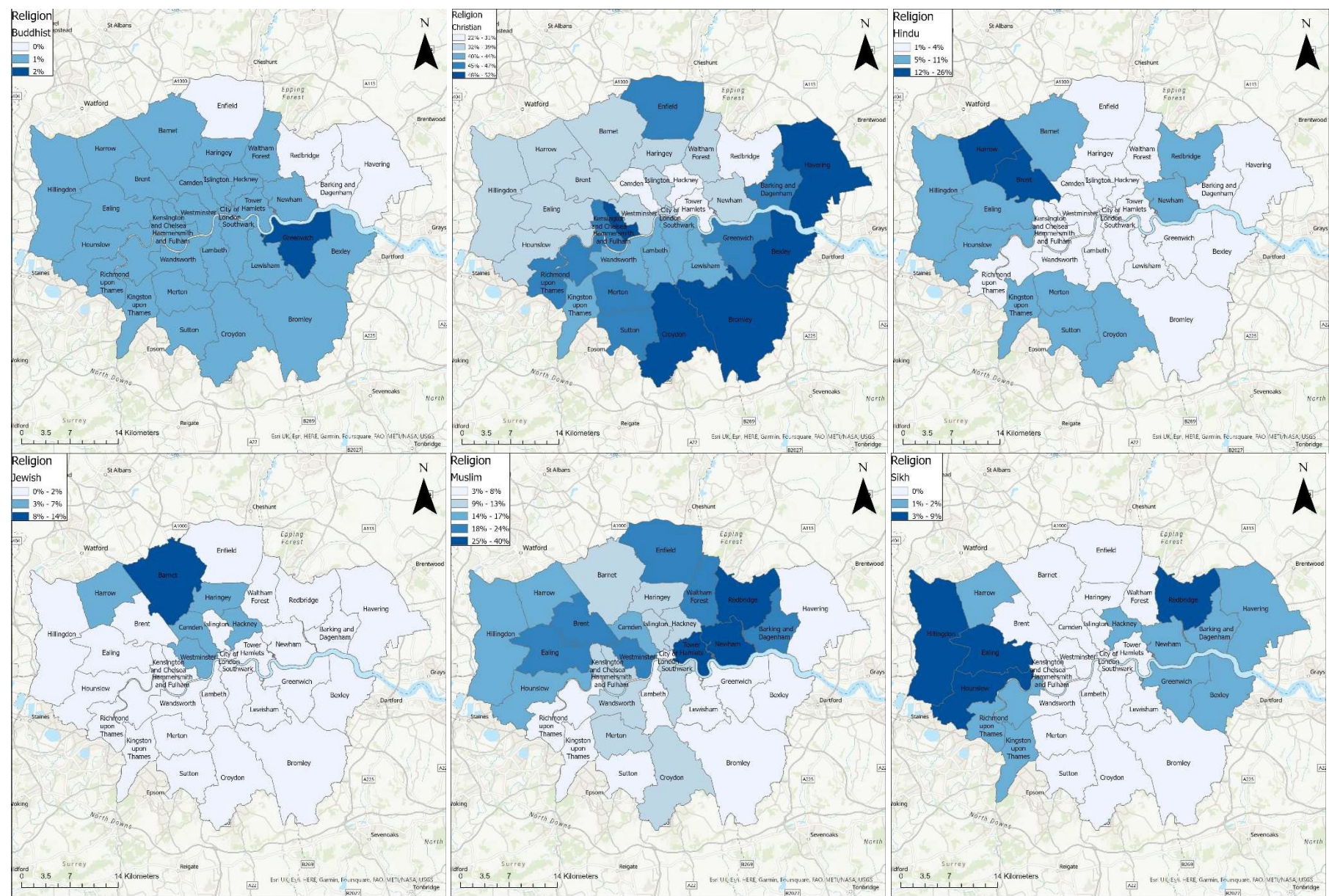
Figure 6: Religion or belief in London and England



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.²⁸ These patterns are mapped in **Figure 7**.

²⁸ ONS, [Religion](#), 2021.

Figure 7: Percentage of different religions across London's LAs (2021)



3.5.2 Pupil faith

According to Census 2021 data,²⁹ the majority of London pupils aged 7 to 11 identify as Christian (203,597 pupils (38 per cent)). This is followed by Muslim (126,017 pupils (23 per cent)); no religion (115,847 pupils (22 per cent)); religion not stated (36,662 pupils (7 per cent)); and Hindu (28,856 pupils (5 per cent)).

This does vary greatly by LB, 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)

LA	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	No religion	Other religions	Religion not stated
London	20,3597 (38 per cent)	2,846 (1 per cent)	28,856 (5 per cent)	10,817 (2 per cent)	126,017 (23 per cent)	9,043 (2 per cent)	115,847 (22 per cent)	3,896 (1 per cent)	36,662 (7 per cent)
Barking & 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

²⁹ 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>

LA	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	No religion	Other religions	Religion not stated
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 & 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
Kensington & 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 are 1,787 state-funded primary schools (educating those aged 3 to 11, with approximately 691,212 pupils on roll across these schools). Of these, 512 schools have been categorised as religious character schools. (1,275 schools have not indicated religious character, or have indicated this does not apply to them.)³⁰ There are several primary schools of particular religious character. Some of the categories include:

- Christian (131,927 pupils)³¹
- Hindu (1,716 pupils)
- Jewish (6,836 pupils)
- Islamic (2,773 pupils)
- Sikh (562 pupils).

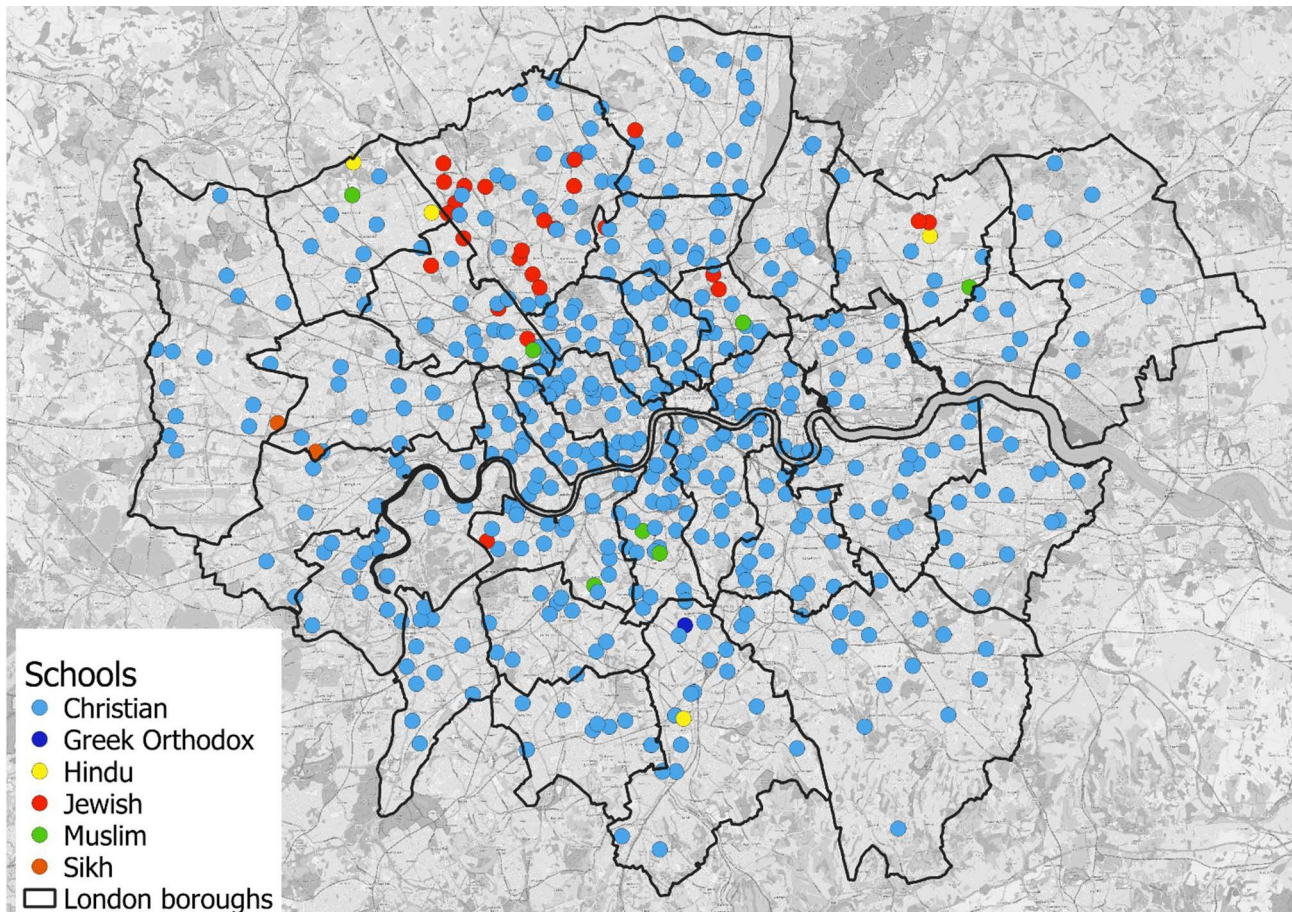
Across London primary schools, there are 474 Christian schools (including Catholic, Roman Catholic, Church of England and Christian); four Hindu schools; 25 Jewish schools; seven Islamic schools; and two Sikh schools. There are 143,814 pupils across these schools – approximately 21 per cent of all primary school pupils in London.

Figure 8 indicates an even distribution of Church of England, Catholic, Hindu and Islamic state-funded primary schools across London.

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

³⁰ DfE, [Get Information about Schools](#)

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



3.5.4 Dietary needs by faith

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

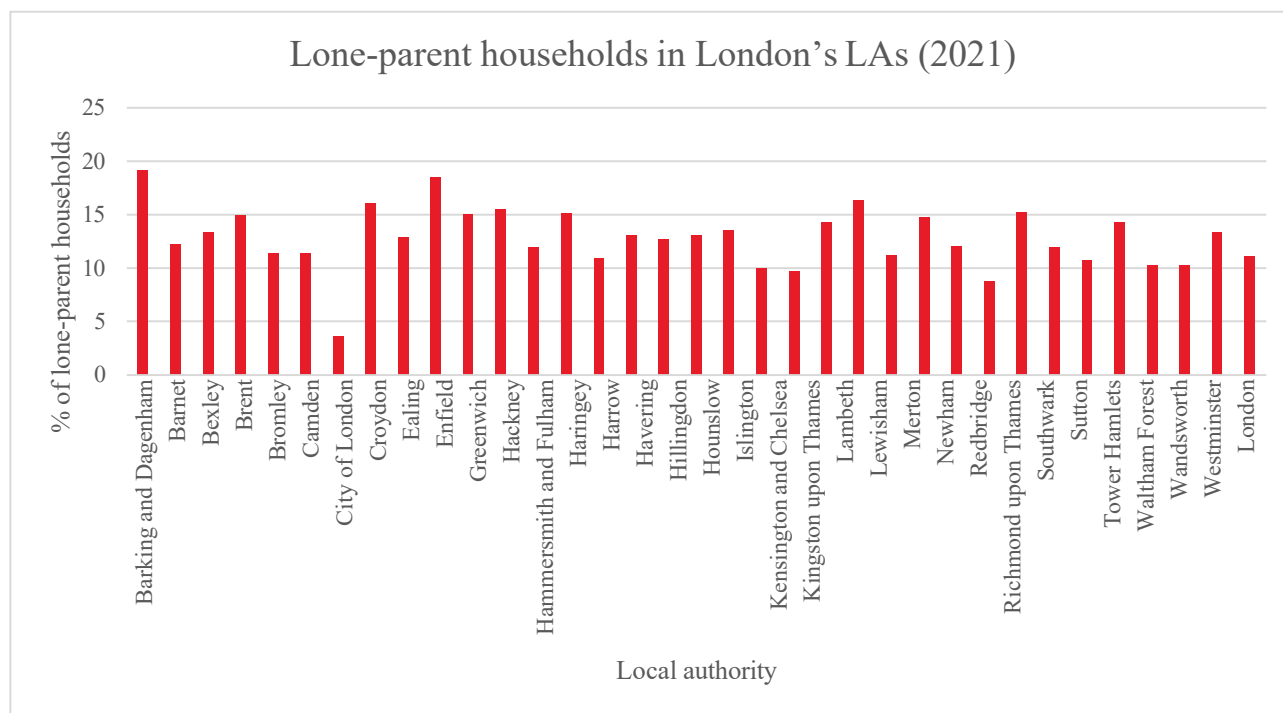
- Islam: Muslims are generally forbidden to eat any pork or derivatives. If other meat products are eaten, they should be halal, i.e., killed in a special manner stated in Islamic law. Generally, fish and eggs are allowed – but not if they are cooked near pork or non-halal food.
- Judaism: Orthodox Jews 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 per cent of households in London are lone-parent households. This is slightly higher than the national average of England of 11 per cent.³² At 19 per cent, 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 per cent) (**Figure 9**).

Figure 9: Proportion of lone-parent households in London



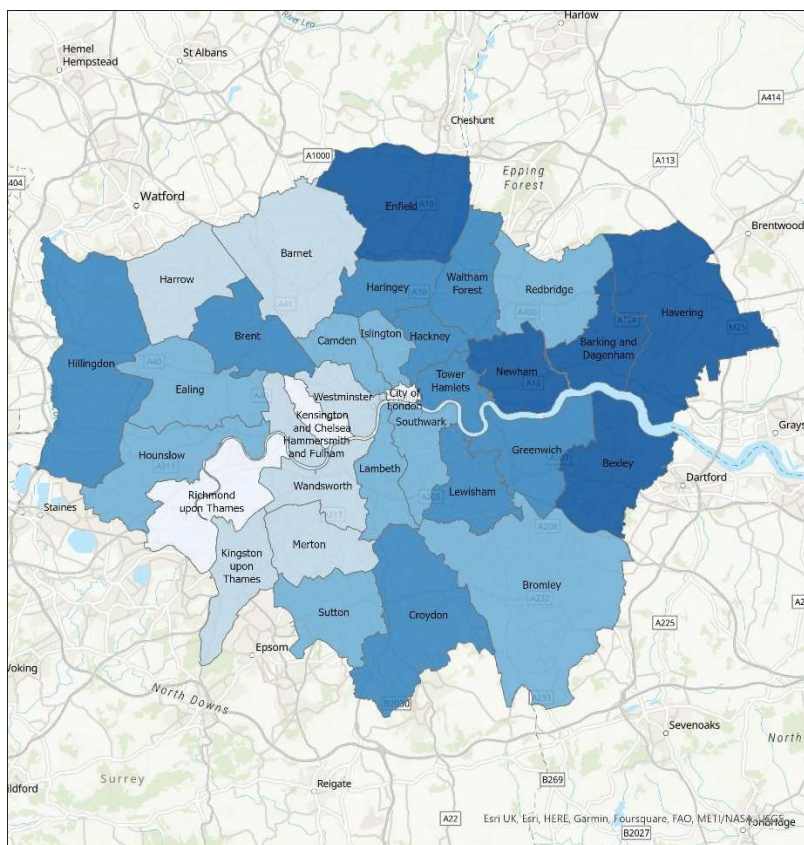
3.6.2 Employment deprivation

The IMD employment domain measures the numbers of adults involuntarily excluded from the labour market. Employment deprivation across the LBs is illustrated in **Figure 10**. This shows employment deprivation in London is greatest within the eastern-most boroughs, and in Enfield in the central north.³³

³² ONS, [Household composition](#), 2021.

³³ MHCLG, [Indices of Deprivation – Employment deprivation](#), 2019.

Figure 10: Employment deprivation in London (2019)



Employment

IMD Average Rank

3529 - 5295
5296 - 9047
9048 - 12472
12473 - 16219
16220 - 21696



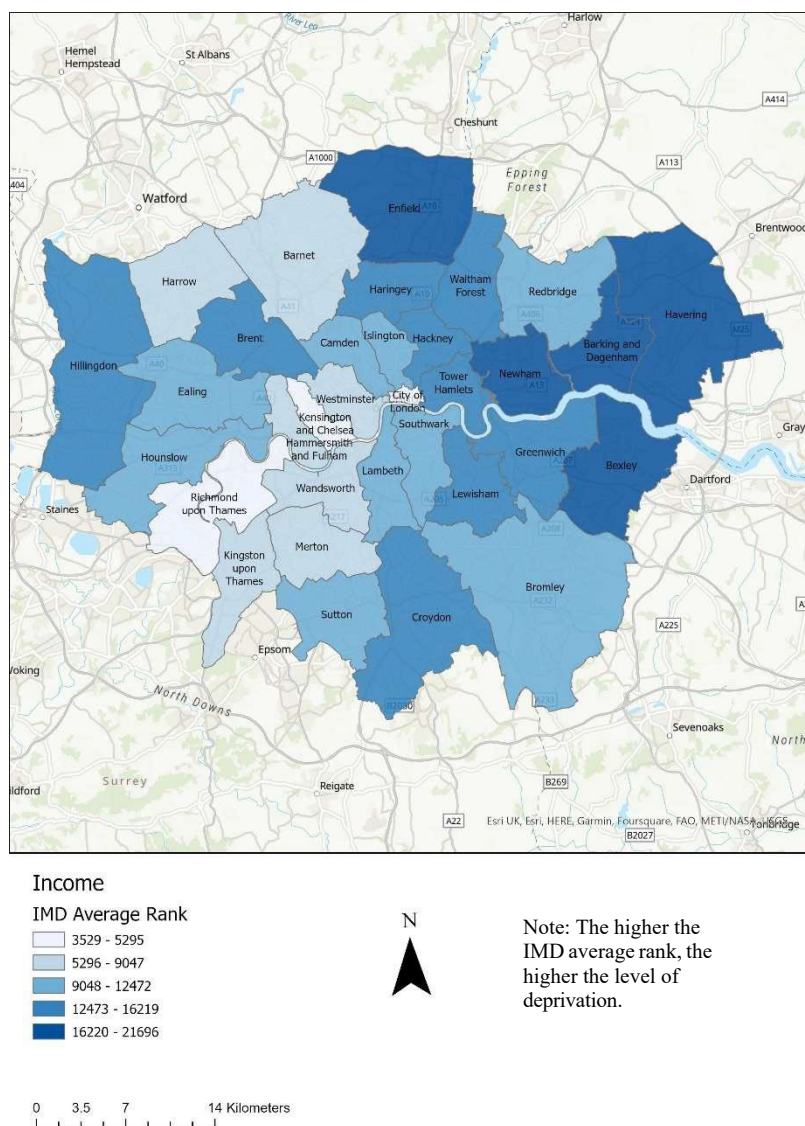
Note: The higher the IMD average rank, the higher the level of deprivation.

0 3.5 7 14 Kilometers

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 in Enfield in the central north³⁰ (**Figure 11**).

Figure 11: Income deprivation in London (2019)



3.6.4 Children living in low-income households.

16 per cent of children in London were reported as living in low-income households in 2022-23. This is four percentage points lower than the national average of England of 20 per cent. The proportion of London's children living in low-income households is relatively high in Tower Hamlets (27 per cent), Newham (23 per cent), Barking and Dagenham (23 per cent), and Hackney (22 per cent).³⁴ The GLA has mapped this data at a more granular ward level across London³⁵ (**Figure 12**).

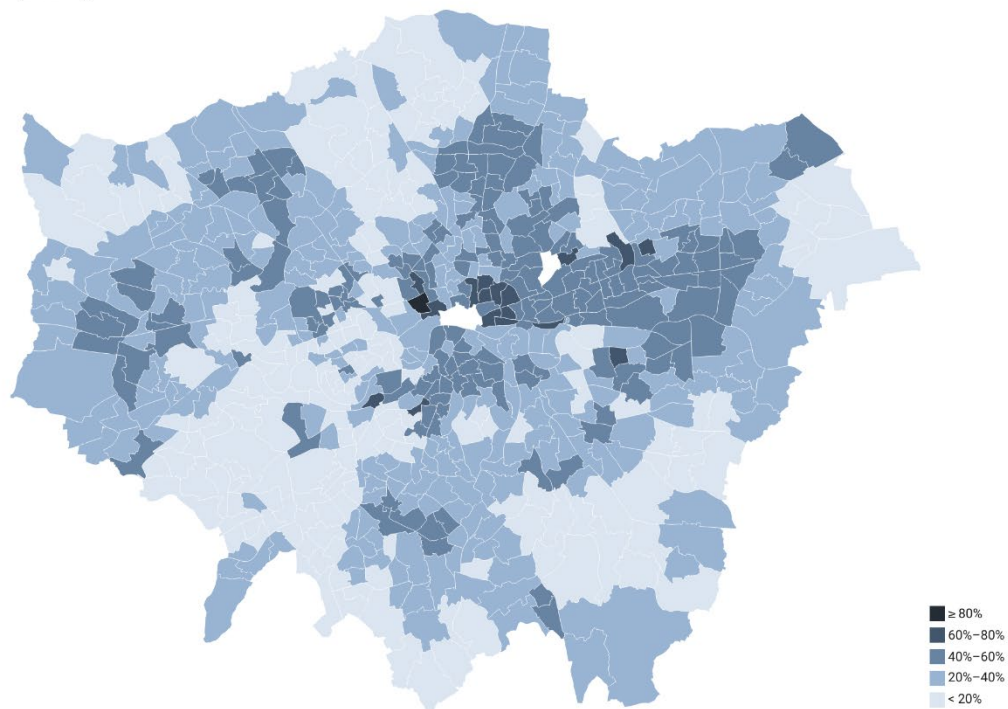
³⁴ IG Inform, [Proportion of children aged 0–15 in relative low-income families in England](#), July 2024.

³⁵ GLA Datastore, [Children in low income families](#), 2024.

Figure 12: Percentage of children in low-income families across London's wards (2022-23)³⁶

Percentage of children under 16 living in low income families, 2022/23, London wards

Rate calculated as a percentage of all aged 0-15



Source: DWP Children in Low Income Families, 2022/23
Note: Rates are calculated as a percentage of ONS ward-level population estimates of 0-15 age group for mid-2022, which are official statistics in development
Ward boundaries as at 2022
Map: GLA City Intelligence • Source: ONS • Created with Datawrapper

3.6.5 Number of Londoners living below the poverty line

24 per cent of London's population was reported as living in poverty.³⁷ The poverty rate was 27 per cent across Inner London, and 23 per cent across Outer London. This is the lowest London poverty rate recorded in the last 25 years. Despite this apparent improvement, the overall London poverty rate of 24 per cent remains higher than that of the UK at 22 per cent.³⁸

3.6.6 LLW

13.3 per cent of London employees were paid below the LLW in 2023.³⁹

The proportion of employees earning less than the LLW varies considerably across the boroughs.⁴⁰ As of 2022, it was more than 30 per cent in Bexley, Haringey, Redbridge and Waltham Forest; and between 20 and 30 per cent in Harrow, Merton, Barking and Dagenham, Enfield, Havering, Barnet, Sutton, and Wandsworth. It was less than 10 per cent in Westminster, Southwark, Islington, Camden, Tower Hamlets and City of London.⁴¹

3.6.7 Benefit cap

According to DWP data, 223,995 households in London had their 'benefits capped to February 2024'. 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

³⁶ GLA Datastore, [Children in low income families](#), 2024.

³⁷ Percentage of people of working age in households with income below 60 per cent of national median.

³⁸ GLA Datastore, [Population in Poverty](#), 2024.

³⁹ GLA Datastore, [State of London](#), 2024.

⁴⁰ Figures are for people working in London, who may not necessarily be London residents.

⁴¹ ONS, [Employees earning below the LLW](#), 2022.

Newham. Limited benefits capping was seen across households in the City of London, Kensington and Chelsea, Bexley, Bromley, Havering, Kingston upon Thames, Merton, Richmond upon Thames, and Sutton.⁴²

3.6.8 Cost-of-living

According to the Cost-of-Living Tracker,⁴³ London households with the lowest incomes are predicted to have a 27 per cent 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,⁴⁴ conducted between January 2022 and April 2024, indicate a rise in those who are 'financially struggling', from around 12 per cent to 20 per cent.

3.6.9 Food security

The Survey of Londoners published data on food security in London.⁴⁵ As of 2021-22, 14 per cent 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 those 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 per cent).

3.6.10 Carers and employment

According to the DWP Family Resources survey 2022-23,⁴⁶ 50 per cent of informal carers aged 16 and above were in employment, compared with 60 per cent of everyone aged 16 and above. The Joseph Rowntree Foundation's 2024 Poverty Report⁴⁷ estimated 28 per cent of carers in the UK were living in relative poverty in 2021-22.

3.7 School demand and attendance

3.7.1 School places

Demand for places in London's state-funded schools is anticipated to decrease in coming years, in line with projected reductions in London's child population. The cohort size of primary-age children (aged four to ten at the start of the academic year) is projected to decrease by 10 per cent between 2023-24 and 2028-29. The number of secondary-age children (age 11 to 15 at the start of the academic year) is projected to decrease by 5 per cent over the same period.⁴⁸

3.7.2 Schools absence and attendance rates

According to 2022-23 data,⁴⁹ attendance rates across London's LAs ranged between 93 and 95 per cent. The boroughs with the highest recorded proportions of absence in state-funded primary schools include Newham (7.3 per cent) and Westminster (7.1 per cent). The lowest absence rates were recorded in Richmond upon Thames (4.8 per cent) and Kingston upon Thames (5.2 per cent).

⁴² DWP, [Benefit Cap statistics](#), 2024.

⁴³ Trust for London, [London's Cost of Living Tracker](#), 2024.

⁴⁴ [GLA Datastore, GLA cost of living polling](#), accessed 17 June 2024.

⁴⁵ GLA, [Survey of Londoners 2021-22](#), September 2022

⁴⁶ DWP, [Family Resources Survey: financial year 2022 to 2023](#), Care Data tables, Table 5.4, March 2024.

⁴⁷ Joseph Rowntree Foundation, [UK Poverty 2024](#), January 2024.

⁴⁸ GLA 2021-based population projections (10-year trend-based variant).

⁴⁹ Explore education statistics service, [Absence rates by geographic level, full academic years – pupil absence in schools in England](#), June 2024.

3.8 FSM

3.8.1 FSM eligibility

According to 2023-24 school year data, the proportion of state-funded primary school pupils known to be eligible for FSM in London is 25 per cent⁵⁰ compared to the English average of 24.3 per cent. The proportion of London state-funded primary school pupils eligible for FSM is highest in Camden (43 per cent), followed by Islington (43 per cent), and Hackney (39 per cent). LBs with the lowest proportion of pupils eligible for FSM include Richmond upon Thames (12 per cent), Harrow (14 per cent) and Kingston upon Thames (15 per cent).

3.8.2 FSM uptake

According to 2023-24 data, 85 per cent of eligible pupils in state-funded primary schools in London take government-funded FSM meals. This compares to 81 per cent across England.⁵¹ The percentage of eligible pupils in London taking their FSM is considerably lower in the City of London, at just 43 per cent. The highest percentage is in Enfield, at 92 per cent.

3.8.3 FSM and ethnicity

According to 2023-24 data, the majority of state-funded primary school pupils who are eligible for FSM in state-funded primary schools in London are White, with 54,666 pupils falling into this category. This is followed by pupils identifying as Black (43,723); Asian (29,614); mixed (26,311); and 'any other ethnic group' (14,634).⁵²

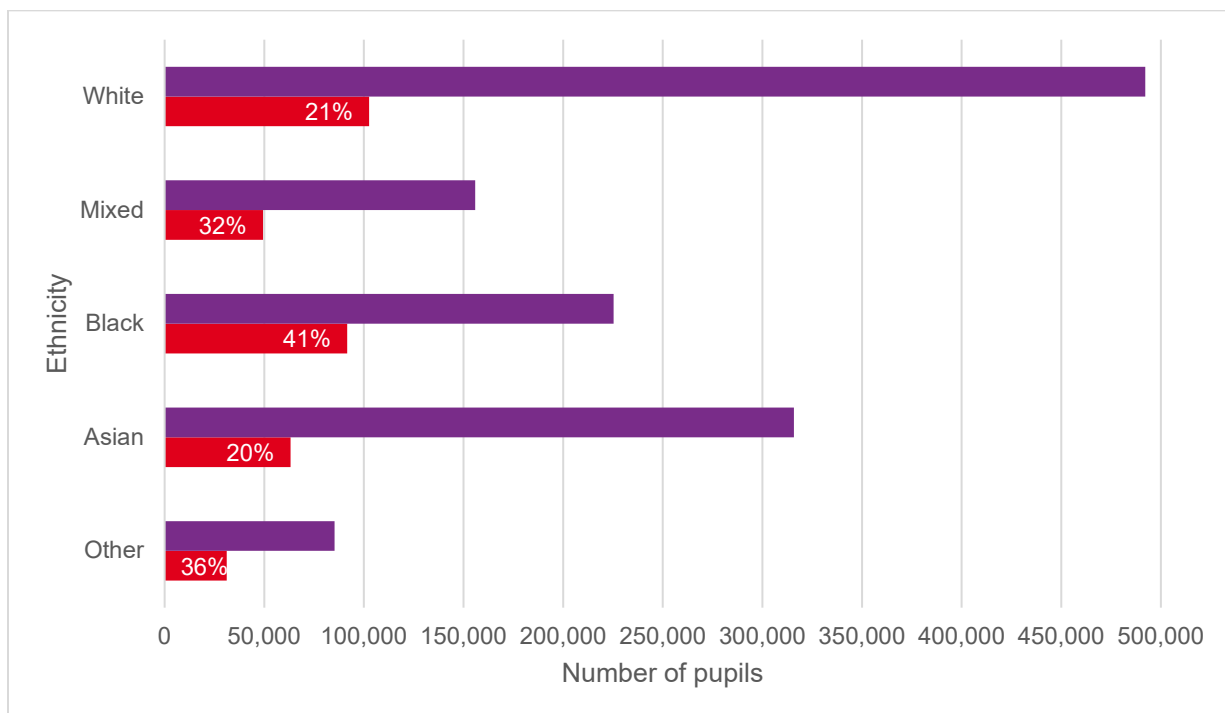
Figure 13: FSM eligibility by ethnicity in London

Note that the percentages shown in the red bars represent the proportion of FSM-eligible pupils, out of all those identifying as the same ethnicity. For example, 21% of pupils identifying as White are eligible for FSM.

⁵⁰ Explore education statistics service, [FSM eligibility by ethnicity or national curriculum year group – Schools, pupils and their characteristics](#), 2024.

⁵¹ Explore education statistics service, [FSM eligibility by ethnicity or national curriculum year group – Schools, pupils and their characteristics](#), 2024.

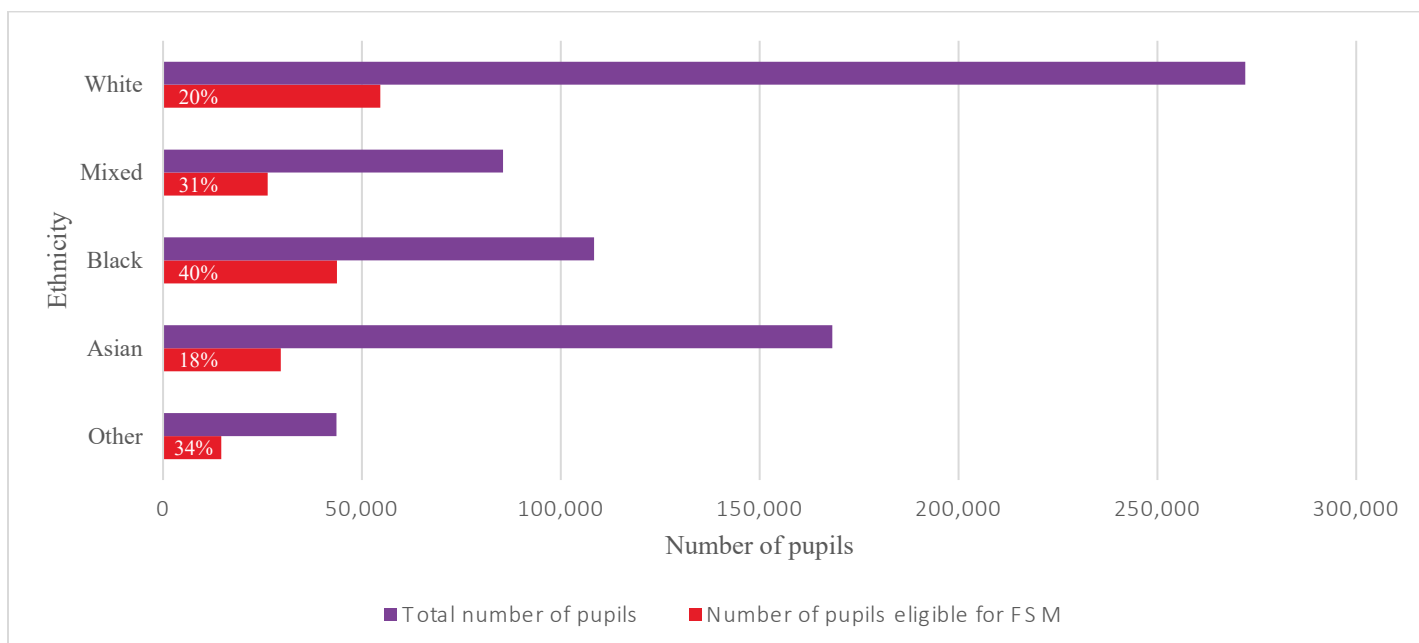
⁵² Explore education statistics service, [FSM eligibility by ethnicity or national curriculum year group – Schools, pupils and their characteristics](#), 2024.



Whilst the majority of state-funded primary school pupils eligible for FSM in London identify as White, the ethnicity with the highest proportion of FSM-eligible pupils is Black. Specifically, 41 per cent of pupils who identify as Black are eligible for FSM in London, followed by pupils identifying as 'any other ethnic group' (36 per cent), Mixed (32 per cent), White (21 per cent) and Asian (20 per cent).

Figure 14: FSM eligibility by ethnicity in state-funded primary schools in London, 2023-24

Note that the percentages shown in the red bars represent the proportion of FSM-eligible pupils, out of all those identifying as the same ethnicity. For example, 20 per cent of pupils identifying as White are eligible for FSM.



3.8.4 FSM and educational attainment

The pupils at London's schools have higher GCSE scores than those from any other region.⁵³ The average "Attainment 8" score, which gives a score across various core and optional elements, is more complex than previous GCSE measures. London pupils do better than those across England, as a whole, on each element of the Attainment 8 score and across most attributes, including FSM status.

For example, in 2022-23, pupils eligible for FSM in England achieved an average score of 34.9, compared to 49.8 for non-eligible pupils. In London, pupils eligible for FSM achieved an average score of 41.8, compared to 53.9 for non-eligible pupils.

⁵³ GLA Datastore, [KS4 Achievement](#), 2024.

4. Consultation and engagement

Stakeholder engagement is a key part of an IIA methodology, and of policymaking more generally within the GLA. The views of stakeholders have informed the scope of the IIA; and the interim and final assessments comprising the IIA.

Engagement prior to the 2023-24 policy launch

Prior to the first iteration of the IIA, GLA officers consulted with LBs and state-funded primary schools on the UFSM policy to understand any potential barriers to take-up; and to explore practical interventions to address these barriers. This consultation took place through webinars, surveys, steering bodies and advisory groups set up by the GLA, as well as one-to-one conversations with LB representatives and school leaders. The survey received responses from 27 out of 33 boroughs. The UFSM team conducted a series of interviews and small group discussions with schools – including those from outer and inner boroughs, academies and LA-maintained schools – and ensured a range of school sizes. In addition, the consultation phase informed key documents and policies such as the UFSM grant agreement.

To inform the first iteration of the IIA, an initial scoping exercise was undertaken, which formed the basis of an initial assessment with high-level interim findings. This initial assessment explored the potential issues and sensitivities to implementing the UFSM policy for protected characteristics. It was conducted through a policy review and baseline profiling work. These interim findings were then used to inform an online stakeholder workshop, which took place in June 2023.

Representatives of over 100 separate stakeholder organisations were identified and invited to attend the online stakeholder engagement workshop. Approximately 25 stakeholders responded expressing an interest in the policy and the workshop; 22 accepted the invitation; and 17 attended.

Following the workshop, an online survey was circulated to all stakeholders previously identified, including workshop attendees, to capture any further views on the UFSM policy. Stakeholders were informed that they could also provide their views via a dedicated UFSM email address. Three stakeholders responded to the survey or emailed their views. In addition, the GLA undertook follow-up interviews with eight stakeholder organisations representing faith groups in London. These interviews explored the potential impacts of the UFSM policy on faith groups, as these impacts had been highlighted earlier in the stakeholder-engagement process. The range of stakeholders included in this engagement is set out in Annex E of the Integrated Impact Assessment⁵⁴.

The engagement, ahead of the policy launch, took place between February and July 2023, via online surveys, workshops, online webinars and telephone interviews. The themes raised during this period informed both the EqlA (published on 11 July 2023) and the final IIA report (published in November 2023).

Key findings from stakeholder engagement prior to the policy launch included the following:

- At a borough level, most boroughs reported no additional costs for halal meals. Some boroughs reported halal meat can be more expensive than non-halal meat, 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. The engagement covered boroughs with both high and low populations of Muslim children.
- 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

⁵⁴ GLA, [UFSM Integrated Impact Assessment](#), 2023

suppliers. This means there is currently no difference in price between halal and non-halal meat. However, the GLA will keep a watching brief on this topic. This will be particularly important in year two, given rising costs associated with school food and catering, and emerging insights from parents and headteachers that show mixed provision of halal food in schools.

- 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 SEND. This related to pupil numbers often being much lower than in mainstream settings. The unit cost of providing these 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 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.

Engagement during the first year of the scheme – used to inform year two

Throughout the first year of the policy implementation, the GLA has undertaken ongoing engagement and research with key stakeholders, both deliverers and recipients of the scheme. This has included termly review meetings with all 33 boroughs; in-depth termly interviews with 30 headteachers; two online communities totalling 40 parents and their children; and termly opinion polling with around 300 parents. The UFSM team has continued to engage experts from the school food and health sectors, academics, researchers, and representatives from other cities, to build an understanding of other schemes and impacts. The UFSM evaluation partners have undertaken surveys with the boroughs and schools, as well as deep-dive case studies in over 25 schools this academic year. The GLA works closely with the evaluation partners via a Working Group to share learnings and guide the policy.

During the first year of the policy's rollout, the UFSM team has shared policy updates and best practice via webinar sessions. These have focused on operational matters for schools, including pupil premium, procurement and supporting infrastructure (for example, kitchens). The GLA has been working with the boroughs that had schemes before 2023, to understand their delivery process and share best practice with others. The GLA has established several steering bodies and advisory groups to ensure a user-centred approach to strategy and operational delivery. This in turn ensures that boroughs, schools and the GLA have an opportunity to jointly identify and discuss issues during the lead-up to the scheme and its rollout. These groups include: the Partnership Advisory Group; task-and-finish groups (Evaluation and Monitoring, Schools and Grant Management); and a UFSM Delivery Group.

Ongoing engagement remains a priority for the GLA and this continues to take place in a range of ways, including:

- regular written updates
- task and finish groups, roundtables,
- regular one-to-one meetings with all boroughs
- meetings with headteachers
- meeting with London Councils

- meetings with the London Food Board
- Partnership Advisory Group – an advisory group that provides guidance and expert input into the development and implementation of the UFSM policy; members include representatives (senior officers, e.g. Directors of Education) from each of the 33 boroughs across London
- insight work is also included as part of the monitoring and evaluation work funded and delivered by external partners
- informal borough intelligence gathering, including via a survey
- in-depth interviews with schools
- consultation to inform the EqIA
- public polling and insights work
- knowledge sharing with boroughs/schools via webinars
- resource sharing on webpages
- discussions at existing borough forums such as Association of Directors of Public Health (ADPH) leads network, etc.

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 updated analysis. 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 <i>People of all ages.</i>	<p>London's proportion of children aged 0-4 is 1 per cent higher than the England average. There is evidence of an association between good diet quality and positive mental health and wellbeing in children).^{55,56}</p> <p>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.⁵⁷</p> <p>Households with more children are more likely to experience food insecurity among children (see section 3.6.9).</p>	None identified.	<p>Positives/strengths</p> <p>Positive impacts on young people aged 7-11 who will now benefit from FSM; 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 be missing out.</p> <p>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.</p> <p>There are also potential benefits for parents who may often prioritise food provision for their children, rather than themselves. This could have benefits for overall health and wellbeing and potentially reduce diet related ill health.</p>	

⁵⁵ 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

⁵⁶ 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

⁵⁷ 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
			<p>There are benefits for households with more children. The current eligibility threshold for FSM does not take account of the number of children in a household. If a family does not fall within the threshold, then they have to pay for school meals for all children. This means household finances have to stretch to provide more meals, and the quality of these is likely to be more impacted.</p> <p>For LBs that already provide UFSM to all primary-school children, they will continue to receive funding, allowing them to reinvest into areas that will benefit families most in need – for example UFSM to secondary school pupils, or enhanced holiday meal provision, which will bring benefits to a wider range of children or varying age groups.</p>	

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
Disability <i>A person is disabled if they have a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. The definition includes: sensory impairments; impairments with fluctuating or recurring effects; progressive, organ-specific impairments; developmental or learning difficulties; mental health conditions; and mental illnesses, produced by injury to the body or brain. Persons</i>	<p>Across London there are 160 state-funded SEND schools.⁵⁸ These are evenly distributed across all LBs. In 2021-22, London had 1,332 SEND pupils in Year 3; 1,360 in Year 4; 1,365 in Year 5; and 1,342 in Year 6. For Years 3-5 the highest recorded number of pupils was in Croydon; and for Year 6, it was in Hillingdon. According to a DfE 2022 publication, eligibility for FSM in children with SEN was 20 per cent higher than for those without SEN.</p> <p>Based on the 2024 national statistics for SEN in England, 40 per cent of children in London's state-funded schools with SEN support and EHCP are eligible for FSM.</p> <p>Approximately 37 per cent of pupils in London with special education needs were eligible for FSM in January 2022 compared to about 20 per cent of pupils without special education needs.</p>	<p>The current proportion of SEND children in need of a special meal or requiring assistance with eating, and the potential implications for cost, are unknown.</p> <p>Ongoing investigation around the pricing of meals for different SEND needs would be useful for informing the whether the new price per meal of £3.00 is adequate to cover provision. Some of this data will emerge from our monitoring and evaluation findings.</p>	<p>Positives/strengths</p> <p>FSM will be available to more children in Years 3-6, in state-funded schools – a proportion of which will be children with SEND. 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.</p> <p>Further considerations</p> <p>Although not all SEND children will have specific dietary requirements, foods often need to be pureed. Economies of scale are tight, given the relatively small pupil numbers in these schools. In year one, top-up funding was offered to support schools that needed to purchase specialist equipment for SEND children, or that incurred an additional cost.</p> <p>State-funded SEND schools 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.</p> <p>SEND children in mainstream schools are more likely to have specific dietary needs –</p>	<p>Continue to closely monitor any implementation issues for SEND schools.</p>

⁵⁸ DfE, [Academic year 2023-24: Special education needs in England](#), June 2024

<p><i>with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled persons from the point of diagnosis.</i></p>	<p>DfE statistics show a clear link between SEND and children living in poverty (see section 3.3.4).</p> <p>Approximately 63 per cent of all SEND children in state-funded schools in London, are not eligible for the government's UFSM.</p> <p>Children of disabled parents are more likely to experience food insecurity (see section 3.6.9).</p> <p>There are strong links between conditions such as attention deficits hyperactivity disorder/autism and avoidant restrictive food intake disorder.⁵⁹</p> <p>A DWP report found that people living in families with disabled children were more than twice as likely to be living in poverty than those where no one had a disability.⁶⁰</p>		<p>whether related to food allergies, intolerances or phobias – that are not necessarily catered for, and therefore may be less likely to engage with school meals. They may therefore still need to bring their own packed lunches to school. Boroughs have the option of purchasing vouchers for these families to ensure that they do not miss out.</p>	
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⁵⁹ Avon and Wiltshire Mental Health Partnership [Avoidant restrictive food intake disorder](#), accessed 28 June 2023.

⁶⁰ Official Statistics, [Below Average Resources: developing a new poverty measure](#), January 2024.

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
Pregnancy and maternity <i>Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.</i>			No impacts identified.	

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
<p>Race/ethnicity <i>This includes ethnic or national origins, colour or nationality; and covers refugees and migrants, and Gypsies and Travellers.</i> <i>Refugees and migrants means people whose intention is to stay in the UK for at least 12 months (excluding visitors, short term students or 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.</i></p>	<p>London is more ethnically diverse than England. At 54 per cent, the proportion of individuals identifying as White in London is much lower than the English average of 81 per cent. A larger proportion of the population in London identify as Asian, Black, mixed and/or other,¹⁸ compared to the rest of England.</p> <p>According to 2023-24 school year data, the majority of state-funded primary school pupils (all years, excluding 'unclassified') in London identify as White (272,116 pupils (40 per cent)), followed by Asian (168,260 (25 per cent)), Black (108,359 (16 per cent)), Mixed (85,481 (13 per cent)) and 'any other ethnic</p>	<p>Data is currently lacking on UFSM uptake by ethnic group, in LBs that have already implemented the policy.</p>	<p>Positives/strengths</p> <p>The data indicates that pupils from Black or mixed ethnic groups are, as a grouping, proportionally more likely to be eligible for FSM.</p> <p>All children who meet the current eligibility criteria for FSM will now receive their FSM. The current process means that parents have to formally apply to their LA, or via their child's academy school, to claim for FSM. 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.</p> <p>Historically families who were undocumented, due to their immigration status, and/or with NRPF (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</p>	<p>Monitoring UFSM uptake, by ethnic group, during the pilot, would provide useful information for any future policy intervention of this nature.</p>

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	<p>group' (43,614 (6 per cent)).⁶¹</p> <p>Whilst the majority of FSM-eligible pupils identify as White, the ethnicity with the highest proportion of FSM-eligible pupils is those identifying as Black. Specifically, 40 per cent of pupils who identify as Black are eligible for FSM in London, followed by 'any other ethnic group' (33 per cent), mixed (31 per cent), White (19 per cent) and Asian (18 per cent).</p> <p>There is a higher percentage of people from ethnic groups other than White in lower-grade jobs that would generally be less well paid (see section 3.4.3).</p>		<p>eligibility criteria.</p> <p>Although a scheme to make FSM available to these families was introduced during COVID-19, and permanently extended to all households with NRPF in January 2023,⁶² this still requires the completion of an application form. UFSM would ensure that families, who are generally amongst the poorest households, and generally higher levels of ethnic minority groups would automatically benefit from FSM.</p> <p>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.</p> <p>Year one insights suggests that many schools, particularly in</p>	

⁶¹ Explore education statistics service, [Academic year 2023-24: Schools, pupils and their characteristics](#), June 2024.

⁶² DfE, [Guidance: Providing FSM to families with NRPF](#), updated March 2024.

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
			<p>ethnically diverse areas of London, already cater well for cultural/faith dietary needs – including, for example, the use of halal meats in communities with a high percentage of Muslim students.</p> <p>Further considerations</p> <p>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 amongst these groups (see section below on ‘religion or belief’).</p>	

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
Religion or belief <i>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</i>	<p>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 Section 3.5.1).</p> <p>Across London, the majority of pupils aged 7-11 identify as Christian (38 per cent), followed by Muslim (23 per cent), no religion (22 per cent), religion not stated (7 per cent) and Hindu (5 per cent).</p> <p>Across London there are 474 Christian schools (including Catholic, Roman Catholic, Church of England and Christian); four Hindu schools; 25 Jewish schools; seven Islamic schools; and two Sikh schools. There are 143,814 pupils across these schools – approximately 21 per cent of all primary school pupils in London.</p>	<p>Data is lacking on primary school pupil numbers by faith, outside of faith-based state-funded schools. Data is currently lacking on UFSM uptake, by faith group, in LBs that have already implemented the policy. It is worth noting that not all students may follow their faith's dietary customs; and therefore demand may be lower than anticipated. No robust dataset exists on the cost of meals that cater to those with religious requirements, although some consultation with</p>	<p>Positives/strengths</p> <p>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.</p> <p>Evidence from our ongoing engagement with boroughs and schools 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 – for example, most schools offer a vegetarian option and/or ensure all meat is halal, in order to meet the needs of their whole school community.</p> <p>With most schools providing at least one vegetarian option on the menu each day, it is anticipated that the dietary needs of most children from Muslim, Buddhist and Hindu faiths would be catered for each day.</p> <p>School food standards require that a portion of non-dairy protein is provided on three or more days each week. This should enable the needs of vegans to be met on most days, and enable them</p>	<p>Monitoring UFSM uptake, by faith group, during the pilot, would provide useful information for any future policy intervention of this nature.</p> <p>Continue to fund kosher food in Jewish state-funded schools at a higher rate.</p> <p>Continue to monitor halal food offer to ensure it meets requirements.</p> <p>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.</p>

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	<p>The distribution of schools shown in Figure 8 indicates an even distribution of Church of England, Catholic, Hindu and Islamic state-funded primary schools across London.</p> <p>Jewish schools are concentrated in the north-west of London, in particular the LBs of Barnet and Brent. Sikh schools are concentrated in the west of London, within the LBs of Ealing and Hillingdon.⁶³</p> <p>Different religious/faith groups have specific dietary requirements (see section 3.5.4 for further details).</p> <p>School food standards⁶⁴ state that 'for vegetarians, a portion of non- dairy protein on 3 or more days each week' should be provided.</p>	<p>boroughs has taken place to mitigate this gap. Ongoing consultation and engagement will seek to verify assumptions around price point.</p>	<p>to benefit from the financial benefits of UFSM.</p> <p>Further considerations</p> <p>School meal provision across mixed faith schools may not necessarily fully 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. This may be more of an issue in schools with lower numbers of children from minority faith groups, where the default may not be to cater for their specific dietary needs. This may affect UFSM uptake 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. This is being monitored as part of the UFSM monitoring and evaluation strategy.</p> <p>State-funded Jewish schools received a top-up in year one to cover the higher cost of Kosher meals. This will continue in year two.</p> <p>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 UFSM uptake by children who follow a vegan diet, who may continue to bring packed lunches to meet their</p>	<p>Ensure that the monitoring and evaluation strategy includes monitoring the number of children, from different faith groups, taking up UFSM.</p> <p>Encourage schools and boroughs to increase the number of vegetarian and fish options to suit a greater range of cultural/faith needs.</p> <p>Ensure that all schools provide at least one vegetarian option each day to cater for faith groups' dietary requirements.</p>

⁶³ DfE, [Get Information about Schools](#)

⁶⁴ DfE, [School food standards practical guide](#), updated 7 February 2023, accessed 12 June 2023.

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	A 2020 landmark legal case ruled that ethical veganism is a philosophical belief under the Equality Act.		dietary requirements and therefore not feel the financial benefits of UFSM.	

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
Sex <i>Both men and women are covered under the Act.</i>	<p>Within London, 13 per cent of households are lone-parent households – slightly higher than the national average.</p> <p>Lone parents have the highest poverty rate among working-age adults: 50 per cent in London, and 42 per cent in England (2019-20).⁶⁵ The majority of the 2.9m lone-parent families in 2022 in the UK were headed by a lone mother (2.5m, or 84 per cent).⁶⁶</p>	<p>Data is not currently available on uptake of FSM by lone-parent households.</p>	<p>Positives/strengths</p> <p>UFSM 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.</p>	

⁶⁵ Trust for London, [Working-age adults](#)

⁶⁶ ONS, [Families and households in the UK](#), May 2024.

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
Sexual orientation <i>The Act protects lesbian, gay, bisexual, and heterosexual people.</i>	<p>Research conducted by YouGov in 2019 revealed that, on average, lesbian, gay, bisexual, transgender, queer and other (LGBTQ+) employees earn 16 per cent less than heterosexual workers.⁶⁷ 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.</p> <p>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.</p>	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 UFSM.	

⁶⁷ Sphere, [Heterosexual and LGBTQ+ pay gap higher than UK's gender pay gap](#), July 2019.

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
Marriage and civil partnership <i>Only in relation to due regard to the need to eliminate discrimination.</i>	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>Consideration of those on low incomes, and those living in deprived areas.</i>	<p>16 per cent of children in London were reported as living in low-income households in 2022-23 – four percentage points lower than the England average of 20 per cent. The proportion of London’s children living in low-income households is relatively high in Tower Hamlets (27 per cent), Newham (23 per cent), Barking and Dagenham (23 per cent), and Hackney (22 per cent).⁶⁸</p> <p>24 per cent of London’s population was reported as living in poverty⁶⁹ between 2020-21 and 2022-23. The poverty rate was 27 per cent across Inner London,</p>		<p>Positives/strengths</p> <p>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.</p> <p>Research by CPAG⁸⁰ has shown that hundreds of thousands of schoolchildren live in poverty, but are not currently eligible for FSM. 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.</p> <p>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</p>	<p>Inclusion in the year two grant conditions a request for boroughs to adopt auto-enrolment.</p> <p>Continue to closely monitor uptake of national funding and pupil premium.</p>

⁶⁸ IG Inform, [Proportion of children aged 0–15 in relative low-income families in England](#), 2024.

⁶⁹ Percentage of people of working age in households with income below 60% of national median.

⁸⁰ CPAG, [New official data shows 900,000 children in poverty don't qualify for free school meals under national policy](#), June 2024.

	<p>and 23 per cent across Outer London. This is the lowest London poverty rate recorded in the last 25 years. Despite this apparent improvement, the overall London poverty rate of 24 per cent remains higher than that of the UK at 22 per cent.⁷⁰</p> <p>13.3 per cent of London employees were paid below the LLW in 2023.⁷¹ Children of low-income parents are more likely to experience food insecurity (see section 3.6.9).</p> <p>Qualitative studies identify that food insecure children in England experience feelings of stigma and shame.^{72,73}</p> <p>There is also evidence that, despite school efforts to minimise identification of FSM-eligible children, experiences of means-tested FSM provision can</p>		<p>current eligibility criteria for FSM, would have access to higher nutritional school meals than the current lower nutritional packed lunches they may be having.</p> <p>Illiteracy amongst parents, whether through lack of education or not having English as a first language, may mean those who qualify for FSM cannot access current FSM, as they are unable to navigate the system/fill in the relevant forms.</p> <p>FSM may have benefits for improving attendance, through both reducing health-related absence and providing a motivating factor in a free lunch. The data shows a correlation between levels of income deprivation in an LA area and school attendance (see section 3.7.2).</p> <p>Further considerations</p> <p>There are concerns that UFSM will reduce FSM sign-ups among those eligible – which may impact on pupil premium,⁸¹ with potential repercussions for a 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: 'To mitigate against this, we would encourage consideration of best practice in promoting registration (and the</p>	
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⁷⁰ GLA Datastore, [Population in Poverty](#), 2024

⁷¹ ONS, [Employees earning below the LLW](#), 2022

⁷² 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.

⁷³ O'Connell, R. and Brannen, J. (2021) Families and Food in Hard Times: European comparative research. London: UCL Press. DOI:10.14324/111.9781787356559

	<p>also lead to embarrassment and shame.^{74,75}</p> <p>The systematic review finds evidence that universal meal provision can lead to reduced stigma.</p> <p>Within the UK there is consistent evidence that packed lunches have a lower nutritional content than school lunches,^{76,77,78} particularly for children within low-income households.⁷⁹</p>		<p>benefits to schools) including models where all parents are required to complete registration.’</p> <p>In March 2025, TP will end. Currently, pupils with eligibility on or since 1 April 2018 still receive FSM – even if their household is no longer eligible under the benefits/low-earnings criteria. This will be the case until March 2025, and remain so until the end of the pupil’s phase of education. However, those newly applying for FSM on or after 1 April 2018, who are in receipt of universal credit and have earnings above the earned-income threshold, will not be eligible for FSM. The implication of TP ending is that many families will need to reapply for pupil premium, when they otherwise would have not done so. Failure to do so could impact school budgets.</p>	
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⁸¹ 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 FSM or has claimed FSM in the last six years, their school receives financial income.

⁷⁴ Sahota, P., Woodward, J., Molinari, R., and Pike, J. (2014) Factors influencing take-up of FSM in primary and secondary school children in England. *Public Health Nutrition*. 17(6)1271-9.

⁷⁵ O’Connell, R. and Brannen, J. (2021) *Families and Food in Hard Times: European comparative research*. London: UCL Press. DOI:10.14324/111.9781787356559

⁷⁶ 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

⁷⁷ 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

⁷⁸ 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

⁷⁹ 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

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
Other relevant groups <i>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.</i>	<p>According to the DWP Family Resources survey 2022-23, 50 per cent of informal carers aged 16 and above were in employment, compared with 60 per cent of everyone aged 16 and above.⁸²</p> <p>The Joseph Rowntree Foundation's 2024 Poverty Report⁸³ estimated 28 per cent of carers in the UK were living in relative poverty in 2021-22.⁸³ This means that 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).</p>		Positives/strengths Those with caring responsibilities may disproportionately benefit from the financial relief provided by UFSM.	

⁸² DWP, 2024, [Family Resources Survey 2022-23](#), Care Data tables, Table 5.4, March 2024.

⁸³ Joseph Rowntree Foundation, [UK Poverty 2024](#), January 2024.

6. Ongoing work

The EqlA is an ongoing process. It should be reviewed and updated throughout the ongoing delivery of 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 EqlA work also forms part of a wider IIA. 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 EqlA, as and when they become available.

Appendix B – UFSM Funding Allocations 2024-25 academic year (by borough)

Borough	Funding Allocation
Barking and Dagenham	£5,024,322.00
Barnet	£7,156,618.35
Bexley	£5,044,842.00
Brent	£5,699,767.79
Bromley	£6,637,707.00
Camden	£1,516,941.00
City of London	£47,709.00
Croydon	£6,253,470.00
Ealing	£5,734,827.00
Enfield	£5,699,293.60
Greenwich	£4,678,560.00
Hackney	£2,744,320.00
Hammersmith and Fulham	£1,692,387.00
Haringey	£4,046,157.59
Harrow	£5,165,910.00
Havering	£5,499,873.00
Hillingdon	£6,098,031.00
Hounslow	£5,063,823.00
Islington	£1,855,521.00
Kensington and Chelsea	£1,142,964.00
Kingston upon Thames	£3,225,231.00
Lambeth	£3,351,942.00
Lewisham	£4,547,745.00
Merton	£3,208,302.00
Newham	£5,865,129.00
Redbridge	£7,132,973.68
Richmond upon Thames	£4,048,596.00
Southwark	£3,573,045.00
Sutton	£4,380,507.00
Tower Hamlets	£3,738,231.00
Waltham Forest	£4,842,207.00
Wandsworth	£3,416,273.94
Westminster	£1,317,384.00
TOTAL	£139,450,610.95