

Greater London Authority (GLA)

Universal Free School Meals (UFSM)

Equality Impact Assessment – refreshed in December 2024



© Enter image copyright here

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.

Job number 603209-20

Ove Arup & Partners Limited
8 Fitzroy Street
London
W1T 4BJ
United
Kingdom
arup.com

Contents

Glossary of abbreviations and terms	1
1. Executive summary	4
2. Introduction	12
2.1 Purpose of the report	12
2.2 The policy	12
2.3 Background	14
3. EqlA methodology	17
3.3 Review of relevant plans, programmes, strategies and objectives	18
4. Baseline profile	20
4.1 Population	20
4.2 Age	20
4.3 Disability	20
4.4 Race	23
4.5 Religion or belief	26
4.6 Socio-economic data	32
4.7 School demand and attendance	36
4.8 Free school meals	37
4.9 Independent schools	38
5. Consultation and engagement	40
6. Assessment	43
7. Ongoing work	65

Tables

Table 1: The number of SEND pupils by ethnicity in state-funded primary schools across London (2021-22)	9
Table 2: Pupil ethnicity in London (2019)	11
Table 3: The faith of pupils aged between 7 and 11 across London (2021)	15

Figures

Figure 1: LAs in the study area	5
Figure 2: Population age breakdown	7
Figure 3: Health deprivation and disability in London (2019)	8
Figure 4: Ethnicity in London and England	11
Figure 5: Socio-economic Classification by Ethnic Group	12
Figure 6: Religion or belief in London and England	13
Figure 7: Percentage of different religions across the London authorities (2021)	14
Figure 8: Spatial distribution of state-funded primary schools in London by their religious character (2023)	18

Figure 9: Proportion of lone parent households in London	19
Figure 10: Employment deprivation in London (2019)	20
Figure 11: Income deprivation in London (2019)	21
Figure 12: Percentage of children in low-income families across London's wards (2021-22)	22
Figure 13: FSM eligibility by ethnicity in London	25

Drawings

No table of figures entries found.

Pictures

No table of figures entries found.

Photographs

No table of figures entries found.

Attachments

No table of figures entries found.

Appendices

No table of contents entries found.

Glossary of abbreviations and terms

Abbreviations

Abbreviations	Definition
CPAG	Child Poverty Action Group
DfE	Department for Education
DWP	Department for Work and Pensions
EHCP	Education, health and care plan
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+	LGBTQ+ stands for lesbian, gay, bisexual, transgender, queer (or sometimes questioning) and others. The "plus" represents other sexual identities, including intersex, asexual, pansexual and Two-Spirit.
NMSS	Non-maintained special schools
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
Ofsted	The Office for Standards in Education, Children's Services and Skills
ONS	Office for National Statistics
PSED	Public Sector Equality Duty
SEND	Special educational needs and disabilities
TP	Transitional Protections
UFSM	Universal Free School Meals

Terms

Terms	Definition
Baseline	Existing conditions against which future changes can be measured.
Equality Impact Assessment (EqIA)	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	The Equality Act 2010 is 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 – designed to prohibit discrimination on the grounds of those protected characteristics described in the Act.
Free school meals (FSM) scheme	The scheme of free school meals, that is funded by the national government in state-funded primary schools.
Integrated Impact Assessment (IIA)	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 (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.
No recourse to public funds (NRPF)	No entitlement to the majority of welfare benefits, including income support, housing benefits and a range of allowances and tax credits.
Protected characteristics	<p>The Equality Act identifies nine characteristics against which it is illegal to discriminate:</p> <ul style="list-style-type: none"> • age • disability • gender reassignment • marriage and civil partnership • pregnancy and maternity • race • religion or belief • sex • sexual orientation.

Public Sector Equality Duty (PSED)	<p>The PSED requires public authorities in exercising 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 • 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 (PP)	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.
Special educational needs and disabilities (SEND)	A term used to describe learning difficulties or disabilities that make it harder for a child or young person to learn compared to children of the same age.
Study area	Defined area where UFSM is being applied (across all London boroughs). It is used as a geographical basis for reporting local community impacts and effects.
Transitional Protections (TP)	From 1 April 2018, Transitional Protections (TP) were implemented by the DfE in partnership with the DWP. This was to minimise the impact of the rollout of Universal Credit; and the introduction of the net-earned threshold to determine eligibility for FSM, and to ensure no pupil loses a meal as result of these changes 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.

1. Executive summary

In February 2023, the Mayor of London announced £130m of funding to provide all school children in state-funded primary schools in the capital free school meals for the 2023-24 academic year. This is the Universal Free School Meals (UFSM) scheme.

In January 2024, the Mayor announced his intention to continue delivering the UFSM scheme to London's state-funded primary schools (including state-funded through-schools, academies, 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.

Approval is currently being sought for a further investment of £147m, for delivery of UFSM in the 2025-26 academic year. This is in the context of a manifesto pledge given by the current Mayor to fund UFSM at least until the end of his Mayoral term in 2028.

The UFSM scheme continues to benefit school children in state-funded primary schools, saving families in London over £500 per child across the year. The aim of the scheme is to help families with the spiralling 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 winter 2024 to ensure that key considerations continue to be made in the Mayor's decision to extend UFSM. This has included incorporating the findings of the independent evaluation of the scheme's first year by Impact on Urban Health (IoUH), published in November 2024.¹

The EqIA aims to systematically identify and assess the impacts and effects, both positive and negative, arising from UFSM. It identifies areas for mitigation of any negative effects, or enhancement of any positive effects, for people sharing one or more protected characteristics as defined by the Equality Act 2010 (the Equality Act). Socio-economic inequality is not currently a protected characteristic under the Equality Act; however, the assessment has considered the potential effects of the scheme for people on the basis of socio-economic status.

UFSM is assessed as potentially having the following positive impacts for a range of individuals with protected characteristics:

- 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 are also likely to extend beyond this group, bringing benefits to other family members including older and younger children, as a result of 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 1, such as parent polling and interviews with headteachers, show that the policy is having this benefit for younger children of different age groups, and we will continue to explore this impact over the course of Year 2.

¹ IoUH, [More than a meal: An independent evaluation of universal primary FSM for children in London](#), November 2024

- By providing UFSM, Year 1 has shown benefits for children's social interaction. This is expected to bring benefits for mental health. This benefit would be more prevalent amongst low-income families who may be struggling with the cost-of-living crisis. The data indicates that pupils from Black or Mixed ethnic groups are, as a grouping, proportionally more likely to be eligible for FSM; and therefore more likely to be subject to the stigma associated with this.
- Concerns still exist around the extent to which UFSM will reduce the numbers eligible for claiming FSM, provided at national government level, actually signing up for that FSM scheme. This could potentially impact on pupil premium (PP) – with potential repercussions on school's financial resources being able to improve the educational outcomes for their disadvantaged pupils. The GLA continues to mitigate against the potential for PP income for schools to be impacted, including through raising awareness of the ongoing need for registration for FSM; providing resources for schools and families; and supporting borough initiatives to adopt auto-enrolment.
- PP application analysis in May 2024 showed no significant shift in the average number of applications across London this academic year, since the UFSM scheme was introduced. However, there are some fluctuations at a borough level: 15 boroughs saw an increase in PP applications; 18 boroughs saw a decrease. Furthermore, in March 2025 Transitional Protections (TP) will end.² Once TP ends, the implication is that many families will need to reapply for PP, when they otherwise would have not done so. Failure to do so could mean that schools miss out on funding support to improve educational outcomes for disadvantaged pupils in state-funded schools in England. There is no data captured by the Department for Education (DfE) on the characteristics of families not registered, or less likely to register, for FSM. Research from the London Borough of Lambeth (LB Lambeth) found that families from Black, Asian or multi-ethnic backgrounds were less likely to be registered.³ The GLA is taking a proactive role in supporting boroughs to inform schools about this change. The GLA will also continue to monitor uptake of PP applications. This includes uptake of national FSM as the policy is implemented.
- For those who are still struggling with the cost-of-living crisis, or are living in relative poverty, but 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.
- A literature review, undertaken to inform the development of the UFSM programme, found that receipt of UFSM may have benefits for improving attendance. This is through reduced health-related absence, and access to a free lunch as a motivating factor.

This EqIA also identifies areas for ongoing work or consideration around the policy.

² 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.

³ See: Policy in Practice, [LIFT case study](#), June 2024. In Lambeth, 79 per cent of children auto-enrolled onto FSM were from Black, Asian or multi-ethnic backgrounds (66 per cent of Lambeth's school children are from these family backgrounds).

Some of these recommendations related to the Year 1 of the policy; others relate to potential for learning from delivery of the programme to date, 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 pupils in 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 2 to £3.00 per meal. 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 1, a top-up fund for Kosher food and SEND schools is being provided.
- The funding-grant conditions and principles continue to ask boroughs to ensure that food adheres to national school food standards; and that school food 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 continue to be higher. The GLA continues to address this through providing a top up fund for SEND schools, and this will be closely monitored through the programme monitoring and evaluation approach.

The UFSM policy in London provides significant benefits to children and families across a range of protected characteristics, particularly those facing economic hardship. It helps improve children's health, wellbeing and educational outcomes, while reducing financial strain on parents and carers. However, there are still some challenges in ensuring that all children can fully access and benefit from the scheme. Some children with SEND, those with specific religious dietary needs, and those transitioning to secondary school may face barriers that need to be addressed.

The following table summarises the information related to equalities impacts on those with protected characteristics, where found.

Age
<p>The UFSM policy in London has significant positive impacts on children aged 7-11, particularly those from lower-income households. By ensuring continued access to nutritious meals, the policy supports children's physical and mental wellbeing; improves their ability to concentrate in school; and enhances academic performance. Households with multiple children also benefit, as financial savings from FSM for school-age children allow better food security for younger and older siblings. Parents, especially those facing financial hardship, also experience relief from meal costs, which can improve overall household nutrition.</p> <p>For London boroughs that had already implemented UFSM prior to the Mayor's scheme, continued funding allows for reinvestment in areas that further benefit families in need – such as extending FSM provision to secondary school pupils, or improving holiday meal support. However, the transition from primary to secondary school remains a concern for families who lose FSM eligibility under the Mayor's scheme, potentially leading to financial strain. Evidence suggests that FSM uptake decreases as children progress through primary school, highlighting the need for further research into barriers that may prevent older pupils from participating.</p>

Disability

Children with special educational needs and disabilities (SEND) are more likely to experience financial hardship, and the UFSM policy provides additional support for these families by ensuring that more children in Years 3-6 have access to FSM. This financial relief is particularly important given the well-documented link between SEND and poverty. The policy also provides opportunities for children with SEND to try new foods in a structured environment; this can be beneficial, given the challenges many of these children face around food preferences and dietary restrictions.

However, children with SEND may not all benefit equally. Many have complex dietary needs that are not always met through standard school-meal provision, potentially leading to lower engagement. Some parents and school staff have reported that, since the introduction of UFSM, the specific dietary requirements of SEND pupils have not always been adequately addressed. Schools have also faced challenges in catering for these children, particularly in cases where food needs to be pureed or specially prepared. Although additional funding has been provided for specialist equipment and higher-cost meals, concerns remain about whether this funding is sufficient. This will continue to be monitored by the programme. Alternative provisions, such as vouchers for families whose children cannot access school meals, should also be explored to ensure equitable access.

Race

The UFSM policy positively impacts children from ethnic minority backgrounds by removing administrative barriers that can prevent families from accessing FSM. Previously, parents were required to formally apply for FSM, which posed a challenge for families with language barriers or complex immigration statuses. The policy also ensures that families with no recourse to public funds (NRPF), who are disproportionately represented among those with ethnic minority backgrounds, automatically receive FSM, reducing food insecurity in some of London's most vulnerable households.

However, some concerns have been raised about whether school meal provision fully reflects the cultural dietary preferences of all communities. Some ethnic minority parents have reported that the food offered does not align with their cultural or religious needs, which has led to lower uptake in certain groups. In particular, children from Black and mixed ethnic backgrounds, who are statistically more likely to experience poverty, may not be fully benefiting from the policy if the meals provided are not culturally appropriate. Additionally, some parents in marginalised communities can feel hesitant to voice concerns about food quality or options due to fears of being perceived as ungrateful.

To address these concerns, schools should continue to review their meal offerings to ensure they cater to the diverse cultural needs of London's school children. Increasing the variety of culturally appropriate meal options and engaging directly with communities to understand their preferences can help ensure that all children can fully participate in and benefit from the scheme.

Religion or belief

The UFSM policy benefits children across all religious backgrounds, as it applies to all state-funded schools, including faith-based institutions. Many schools already provide Halal and vegetarian options, ensuring that a significant number of religious dietary requirements are met. Additionally, the policy's financial savings are particularly beneficial for families with religious dietary restrictions who might otherwise face higher food costs.

Despite these benefits, some challenges remain in ensuring that school meals are fully

inclusive for all faiths. Jewish, Sikh and some Hindu pupils may struggle to find suitable meals, particularly in schools where they are in the minority. While some schools provide Halal-only meat options, this does not necessarily cater to the dietary needs of all religious groups. Similarly, pupils who follow a vegan diet for ethical or religious reasons may find that meal options do not consistently meet their needs, leading them to bring packed lunches and missing out on the financial benefits of UFSM.

The policy has taken steps to address these issues, including providing additional funding for Jewish state-funded schools to cover the higher cost of Kosher meals. However, ongoing monitoring is needed to assess uptake across different religious groups; and ensure that schools provide a sufficient range of culturally and religiously appropriate meal options. Encouraging schools to expand vegetarian and fish-based options can help ensure that children from all faith backgrounds are able to fully participate in the UFSM scheme.

Sex

The UFSM policy provides financial relief for single-parent households, the majority of which are headed by women. Given that single-adult households with children have the highest poverty rates, UFSM helps alleviate some of the financial pressures faced by these families. By reducing meal costs, the policy can improve overall food security for children in lone-parent households, supporting their health and educational outcomes.

Although the policy has clear benefits for single mothers and their children, data on FSM uptake by lone-parent households is currently unavailable. Further research is needed to ensure that all eligible families are benefiting from the scheme and that any barriers to participation are identified and addressed.

Sexual orientation

LGBTQ+ parents and guardians may experience additional economic disadvantages, as research has shown that LGBTQ+ individuals tend to earn less than their heterosexual counterparts. Given this wage disparity, LGBTQ+ families may be more vulnerable to the financial pressures of the cost-of-living crisis. By providing FSM to all children, the UFSM policy helps reduce some of these economic burdens, ensuring that LGBTQ+ parents, particularly those on lower incomes, can better provide for their families.

Although no specific negative impacts have been identified for LGBTQ+ individuals, further assessment of the socio-economic challenges faced by these families could help ensure that the policy continues to address financial inequalities effectively.

Research from Year 1 of the policy: Independent evaluation by IoUH

In November 2024, IoUH published findings⁴ from two studies exploring the rollout of UFSM:

- a lived-experience evaluation by Child Poverty Action Group (CPAG) and Reconnect London, gathering the experiences of children, families and schools
- an implementation evaluation by ICF and Public Health Nutrition Research, based on data from schools, local authorities (LAs) and caterers.

The evaluations focused on the first year of the policy only. They highlight some of the challenges with implementing a new policy within a demanding timeframe, as well as the positive effects and successes. They acknowledge the context in which this policy was delivered: a school food system under stress.

Key findings from IoUH's report have been incorporated into this EqIA, as part of a refresh in December 2024. Relevant findings related to the impact on families and pupils are summarised below:

Family finances

- Families across the income spectrum have been experiencing rising costs that have put a strain on their finances. The policy is easing this pressure, with 84 per cent of all parents surveyed claiming the policy has helped or significantly helped their household finances. Across all parents surveyed, a third said the policy meant they have less debt and the money saved was being used for household essentials.
- Families living on low incomes are benefiting the most from the additional financial support, with parents in receipt of Universal Credit more likely to say the policy was 'significantly helping' household finances (52 per cent compared to 31 per cent not receiving Universal Credit). School staff reported the policy was positive for all families; but felt it had the biggest effects financially on families just above the income threshold.

Physical and mental health and wellbeing

- While mental health is not directly a protected characteristic, it is helpful to note – in terms of benefits to children – that the policy has had a positive effect on the mental wellbeing of children and parents living on low incomes, by reducing the emotional burden and stress of trying to provide an adequate school lunch. More than one in three parents surveyed (35 per cent) stated that their child is now less worried about food at school.
- The policy is supporting children's nutrition by:
 - increasing the proportion of children taking a school meal rather than packed lunch
 - freeing up money for parents to spend money on 'better' and 'healthier' food at home: 60 per cent of parents surveyed were able to spend more money on food for their family as a result of the policy
 - encouraging children to try new foods at school: 55 per cent of all parents surveyed thought their child was trying new foods because of the policy, increasing to 63 per cent for families in receipt of Universal Credit (63 per cent).
- Findings from the evaluation suggest that benefits of the policy are felt strongest by families living on low incomes.

⁴ IoUH, [More than a meal: An independent evaluation of universal primary FSM for children in London](#), November 2024

School communities

- The policy is contributing to a calmer start to the school day for families across the income spectrum. It ensures children arrive at school more ready to learn; and, in some cases, supports parents to get to work on time. Just over half of parents surveyed said it saved time in the morning that they used to spend making packed lunches. Women, in particular, noticed this change of not having to make lunches, which freed up time to spend with their children and helped them get to work on time.
- The policy has near-resolved the issue of dinner-money debt for primary schools, and for parents who were previously struggling to cover the cost of primary school meals in London. This has led to improved parent-school relationships and a reduced administrative burden on school staff. This is another example of a specific benefit of the policy for families living on low incomes. However historic dinner-money debt remains a challenge in some schools, limiting the potential positive effect of the policy for some families.
- Children, school staff and parents all spoke about children's improved energy levels and ability to concentrate due to having a school lunch, with this again supporting children's readiness to learn. More than a third of parents surveyed (34 per cent) felt that UFSM means their child can concentrate better on school and lessons.
- Parents, school staff and children viewed the policy as a leveller, supporting a sense of fairness and happiness at school. More than one in three parents surveyed (35 per cent) felt that their child enjoyed school more since the policy had been in place.

Equitable access

- The evaluation notes that the school food system in England is complex, with challenges around funding; food quality and standards; options; eligibility and access to meals; and lunchtime experiences for pupils. These issues predate this policy, and can mean certain groups of families or those with protected characteristics are less able to access a school meal. Even with universal provision, there is still more attention needed to make sure the policy is fully accessible, particularly to those who need it the most. The evaluation shows that the policy is beneficial to those who can access the offer but that some groups have challenges accessing meals. It is therefore vital that further research is done to explore why accessing FSM remains a challenge for some.
- The GLA considered the likely effects of the policy on those with one or more protected characteristics in detail through the EqIA. It made additional funding available through a £5m contingency fund to mitigate the risks of inequitable take-up experiences of the policy – for example, in relation to the cost of Kosher meals and exceptional costs experienced by special schools
- Children with SEND are more likely to have specific requirements around food and schools. Caterers have shared challenges in implementing the policy in special schools where there are varied and complex needs. However, data from Arbor shows that take-up was similar between pupils with SEND (88 per cent) and without SEND (90 per cent); but this is a limited sample (13 per cent of primary schools).
- The research showed some pupils with faith-based dietary needs faced limited meal options, which sometimes impacted take-up. Some parents felt strongly that lunches should reflect the culture and preferences of the school community, in order to increase take-up. One in four parents surveyed (26 per cent) asked for more options that meet their child's dietary, religious and cultural requirements.

- These evaluation findings indicate that take-up of meals can be challenging for some groups of pupils. More research is needed to understand the specific challenges and barriers. Best practice and successful approaches also need to be shared, so that all children have equitable access to filling, healthy school food. This includes ensuring:
 - the food on offer, how it is presented, and the support provided to eat it are appropriate for pupils with SEND in both mainstream and special schools
 - there is enough choice and variety for children with faith-based requirements, to enable them to take up a meal every day and to improve their enjoyment of school lunches
 - school meals are culturally appropriate, to reflect the diversity of local school communities
 - parents have clear information on how school meals meet their children's specific dietary requirements.
- Evaluators found many examples of school practices that can help in this area – from headteachers being included in decisions about school food, to the involvement of expert chefs and giving families more of a say in school meals. The research showed that having a better range of choices, helps more pupils to choose a meal and feel fuller. A strong approach from school leaders was found to be central to the success of the policy. Schools that were part of the case studies shared that, when senior leaders were present during lunchtimes, ate their meals with pupils, and took an interest in pupil preferences, the food offer in turn reflected the school community better and was more appealing to children, more culturally appropriate and of better quality.

2. Introduction

2.1 Purpose of the report

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

Under Section 149 of the Act, all public bodies are required to have due regard under the PSED.

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

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

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 to ensure that the plan development takes account of any key equality issues raised by stakeholders and local communities. This document was most recently updated in December 2024, ahead of the roll-out of Year 2 of the policy.

2.2 The policy

Year 1 (2023-24 academic year)

In Year 1 the Mayor of London announced £130m of emergency funding, to provide UFSM to all KS2 children in London's state-funded primary schools for the 2023-24 academic year. This emergency funding has helped 287,000 extra primary school children; and saved 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. Prior to this, there was a wide variance in FSM unit costs – including where there was already a universal offer across and within boroughs in London. Drivers for this variance relate to a range of issues, including paying the London Living Wage (LLW) to school staff; adherence to healthy food standards above and beyond the School Food Standard; and the scope and status of current contracts for catering provision. The £2.65 price per meal for the UFSM London scheme 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 that can evidence a higher uptake were able to claim additional funding.

In response to findings from the EqlA, additional funding was also made available to cover the higher price of providing Kosher meals, at £3.50 per meal, for Jewish state-funded schools, as well as any exceptional costs arising for state-funded special schools to support the higher cost of meals for pupils with SEND where needed.

Years 2 and 3 (2024-25 and 2025-26 academic years)

In January 2024, the Mayor announced his intention to continue delivering the UFSM scheme to London state-funded primary 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 MD3224 on 18 January 2024. Approval is currently being sought for a further investment of £147m for delivery of UFSM in the 2025-26 academic year. The Mayor has committed to fund UFSM at least until the end of his Mayoral term in 2028.

To continue to support delivery of the scheme, the policy extension for 2024-25 included an increased meal price from £2.65 to £3.00. It is proposed that this continues.

As with Year 1, additional funding will also be made available to cover the higher price of providing Kosher meals, at an increased rate of £3.85 per meal, for Jewish state-funded schools; and any exceptional costs arising for state-funded special schools to support the higher cost of meals for pupils with SEND, where needed.

Five London boroughs were already funding FSM to their London primary state-funded schools in 2022-23. Funding continues to be allocated to them, as if they had not previously provided this function.

In Year 3 of the scheme, it is proposed that funding will be provided on the basis of an 87 per cent take-up rate, reflecting rates of take-up seen to date. This compares with an initial allocation of 90 per cent in Years 1 and 2. Each borough can still secure additional funding, if they can evidence that uptake of the scheme has exceeded the assumed rate at which they have been funded.

Grant terms and conditions will continue to require that funding is spent on delivery and implementation of the scheme. Terms and conditions will be refreshed each year, based on the learning to date, but will be kept to a minimum to mitigate the extra burden on schools. In Year 2, there was an additional requirement for boroughs to consider adoption of good practice related to auto-enrolment. Boroughs received additional funding to support these activities.

The Mayor's UFSM policy is consistent with the government's existing funding of school meals, as outlined in DfE guidance,⁵ in that it covers:

- state-funded primary schools
- pupil referral units
- special schools, including:
 - maintained schools

⁵ DfE, [Free School Meals: Guidance for local authorities, maintained schools, academies and free schools](#), March 2024

- academies
- free schools (including faith schools)
- non-maintained special schools (NMSSs).

As with the government's existing funding of school meals, it does not cover private or independent schools. The GLA acknowledges that there are some communities in London whose children largely attend private settings or independent schools, and who therefore will not benefit from this funding.

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, conducted by the GLA, can be found as a [supplementary paper](#) to the EqlA. It was completed in June 2023; it was subsequently kept under review and updated to ensure all considerations were made in the policy development of the Mayor's UFSM scheme. Ultimately, UFSM funding is a limited pot of money that is not extensive enough to cover every child in London. Partly for this reason, the policy has prioritised state schools above schools that charge fees or receive alternative income for pupils, which could be used to pay for meal.

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, this year the Mayor has invested £3.9m to deliver over 10m meals during school holidays and at weekends, through partners the Felix Project and the Mayor's Fund for London. Going forward there is an ongoing commitment to deliver food support to young people as part of a Holiday Hope programme; this will look at providing positive opportunities for young people during the holidays.

The Mayor has also invested £498,000 into a London pilot of Multibank. This supplies in-kind donations of essential goods to organisations that work with Londoners struggling with the cost of living. This includes support to establish a partnership with Little Village, a baby bank network, to enhance provision of essential items that London families are increasingly struggling to afford. The funding is also enabling Little Village to open some of its hubs on evenings and at weekends, so that it can reach more working families, outside normal working hours, with essential items and wraparound support for their financial situations. Making FSM available to all not only saves families hundreds of pounds per child; it also helps reduce the stigma that can be associated with being singled out as coming from a low-income background. In this way, it boosts take-up among families who need this support the most. The meals are also good for children's health, as they may be the child's main source of food. By ensuring they do not go hungry, children are better equipped to learn.

2.3 Background

All state-funded school children in England at KS1 (reception through to Year 2) receive FSM. Before September 2023, when the Mayor's UFSM scheme was introduced, FSM was only offered at KS2 (children in Years 3-6) for those meeting specific eligibility criteria for FSM. This is no longer the case, because the UFSM scheme funded by the Mayor has enabled FSM to be provided to all KS2 children in London's state-funded primary schools.

Research by CPAG⁶ has shown that hundreds of thousands of school children 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 LA, or via their child's academy school, to claim FSM for KS2 children. Government estimates on claim rates indicate that around 11 per cent of KS2 school children who are eligible for FSM have not taken up the offer. There is no information available to explain this finding.

In March 2025, TP will end. Currently, pupils with eligibility on or since 1 April 2018 will receive FSM until March 2025 or until their phase of education is over, whichever is later. This is the case even if their household is no longer eligible under the benefits/low-earnings criteria.

However, those 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. Once TP ends, the implications are that many families will need to reapply for PP, 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 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. It was 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.”⁷

However, the guidance says that the **government expects LAs to consider making equivalent food provision for children who are receiving EOTAS**, 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 DfE states:

⁶ CPAG, [New official data shows 900,000 children in poverty don't qualify for free school meals under national policy](#), 5 June 2024

⁷ DfE, [Free School Meals: Guidance for local authorities, maintained schools, academies and free schools](#), March 2024

“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 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 therefore has been updated to say that it will be the LA’s responsibility to consider these cases on an individual basis.

3. EqlA methodology

3.1 Approach to the assessment

The 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'. It is important to note the following:

- 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 Equality Act, marriage and civil partnership is considered a protected characteristic only in relation to discrimination in the workplace; it is therefore outside the scope of this assessment. Socio-economic 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, to strengthen potential positive equality effects, and to ensure that, where possible, UFSM promotes equality of opportunity.

3.2 Study area

The study area includes all 33 LAs that make up Greater London:

- | | | |
|-----------------------|--------------------------|--------------------------|
| 1. Barking & Dagenham | 12. Hackney | 23. Lewisham |
| 2. Barnet | 13. Hammersmith & Fulham | 24. Merton |
| 3. Bexley | 14. Haringey | 25. Newham |
| 4. Brent | 15. LB Harrow | 26. Redbridge |
| 5. Bromley | 16. LB 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. City of Westminster |

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

Figure 1: LAs in the study area



3.3 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)⁸
- the London Health Inequalities Strategy (2018)⁹

⁸ GLA, [The London Food Strategy](#), December 2018

- the Mayor's Equality, Diversity and Inclusion Strategy (2018)¹⁰
- the London Plan (2021)¹¹
- the London Environmental Strategy (2018).¹²

Key considerations, deemed 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 updated on an ongoing basis.

3.4 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; as such, it does not extend to pupils within private or independent schools. Engagement and analysis have highlighted a need to further investigate the potential impact and effects of the policy on schools across the whole education sector, including independent schools. This additional analysis has been conducted by GLA Economics; 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 or the most up-to-date population data from the ONS. It is worth noting that the 2021 census was conducted during the COVID-19 lockdown; respondents were asked to complete the census based on where they were living at that moment. Therefore, it may not be an accurate reflection of London's current demography.
- With regard to faith, the assessment has focused on the key faiths for which census data on prevalence is available (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 also have specific dietary needs associated with their beliefs.

⁹ GLA, [The London Health Inequalities Strategy](#), September 2018

¹⁰ GLA, [Inclusive London: The Mayor's Equality, Diversity and Inclusion Strategy](#), May 2018

¹¹ GLA, [The London Plan](#), March 2021

¹² GLA, [London Environmental Strategy](#), May 2018

4. Baseline profile

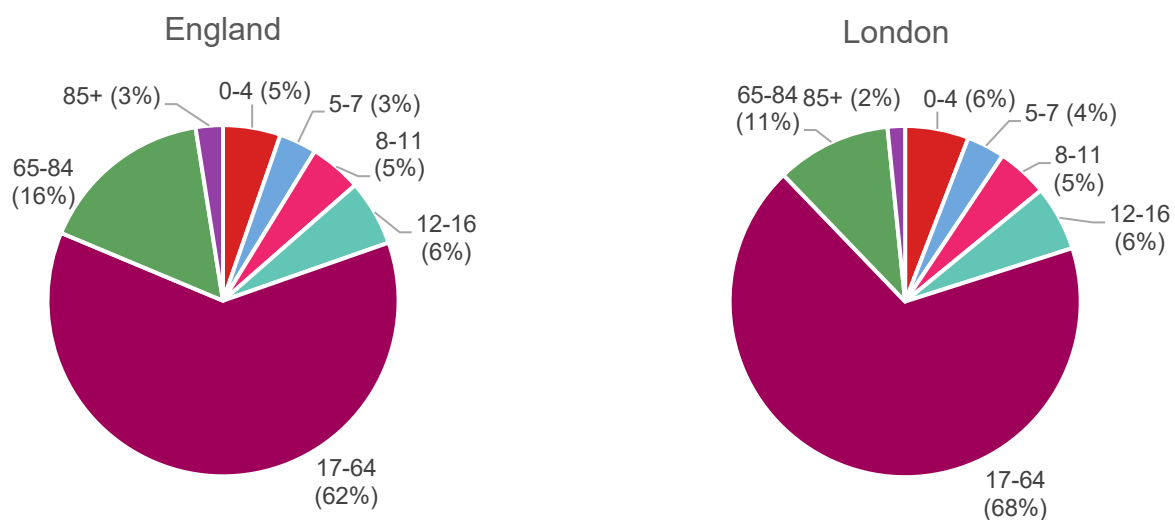
4.1 Population

The most recent estimate of London's population is 8.95m.¹³ According to the GLA's population projections, London's population is projected to increase to 9.7m by 2040.¹⁴ London's population is expected to rise to about 10m by 2040.¹⁵ There are large variations in population growth trends between LAs in London.

4.2 Age

As per **Figure 2**, the age breakdown of London's population aged 16 and under is relatively similar to that for England. There is, however, a higher proportion of individuals aged between 17 and 64 in London, compared to England; and a lower proportion of individuals aged between 65 and 84.¹⁶

Figure 2: Population age breakdown for England and London, 2023



4.3 Disability

The Index of Multiple Deprivation (IMD) health deprivation and disability domain measures the risk of premature death, and the impairment of quality of life through ill health or disability. **Figure 3** indicates that Barking and Dagenham, Lambeth, Southwark, Lewisham, Tower Hamlets, Hackney, and Islington are relatively deprived in terms of health and disability.¹⁷

¹³ ONS 2023 mid-year population estimate.

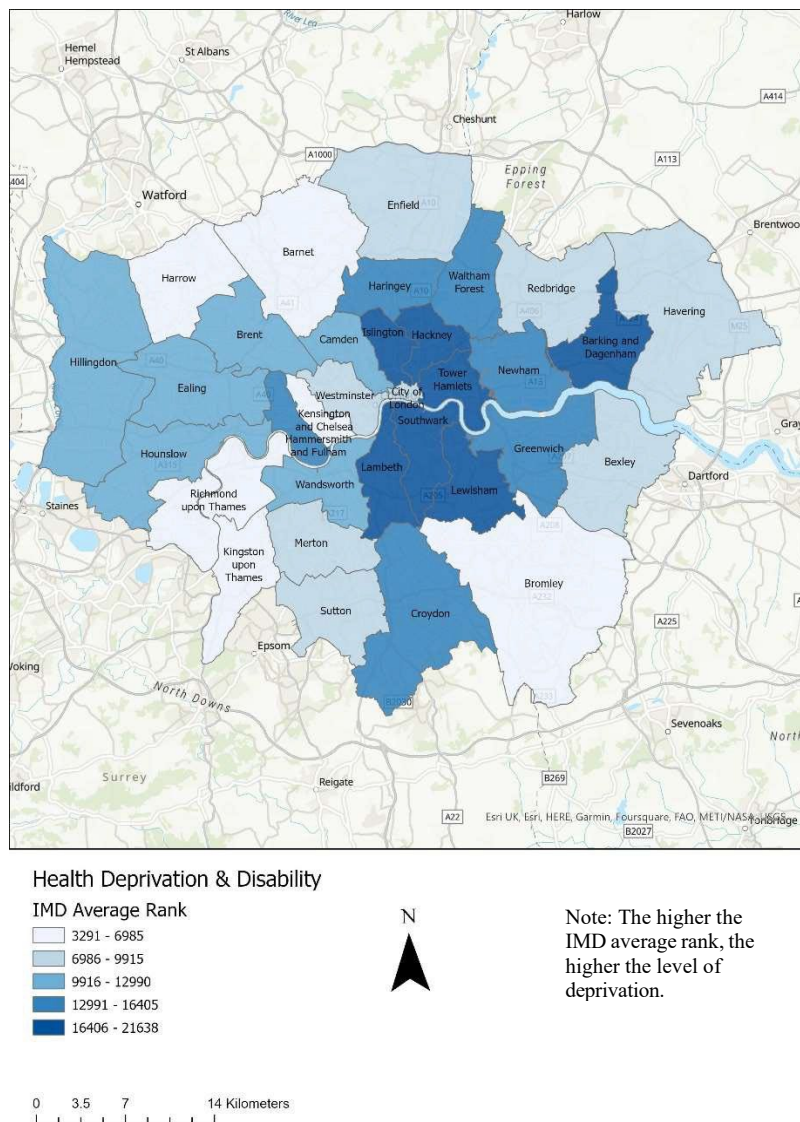
¹⁴ GLA 2022-based projections, 10-year central fertility variant.

¹⁵ GLA Housing-led population projections, 2023. Housing-led population projections – London Datastore.

¹⁶ ONS, [Estimates of the population for England and Wales mid-2023](#), 15 July 2024

¹⁷ MHCLG, [Indices of Deprivation – Health Deprivation and Disability](#), 2019

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



4.3.1 SEND schools in London

Pupils with SEND can be educated in mainstream or special schools in England. The special school sector includes state-funded, non-maintained, alternative and independent schools. Most pupils with SEND attend mainstream settings. Of those in state-funded special schools, most have an education, health and care plan (EHCP).

Across London there are 160 state-funded special schools.¹⁸ In 2023-24, there were 1,332 Year 3 pupils in state-funded special schools in London; 1,360 Year 4 pupils; 1,365 Year 5 pupils; and 1,342 Year 6 pupils. For Years 3-6, Croydon had the most pupils with SEND in state-funded special schools (355).

¹⁸ DfE, [Special education needs in England for the 2023-24 academic year](#), 20 June 2024

FSM for children with SEND

Based on the 2023-24 national statistics for special educational needs (SEN),¹⁹ 38 per cent of children in London's state-funded primary schools with SEN support and/or an EHCP are eligible for FSM. The lowest figures are seen in the City of London, at 23 per cent; and Harrow, at 24 per cent. Among children with SEND in London's state-funded primary schools, eligibility for FSM was 16 per cent higher than for children without SEND.

There are also three NMSSs in London: in Hammersmith and Fulham; Haringey; and Hillingdon. In 2023-24 these schools had a total of 47 pupils in Key Stage 2 (KS2), 16 of whom were known to be eligible for FSM.²⁰ NMSSs are covered by government-funded FSM, because they have an identical duty to provide FSM to eligible pupils under the Non-Maintained Special Schools (England) Regulations 2015. The government's school food standards also cover NMSSs.

4.3.2 SEND and race

The majority of SEND pupils in state-funded primary schools (all years, excluding 'unclassified') in London identify as Mixed (45 per cent of pupils with SEND).²¹ This is followed by pupils who identify as White (25 per cent); Black or Asian (13 per cent each); and Other (4 per cent). These figures, along with LA-specific data, are presented in **Table 1**, below, and exclude those who are 'unclassified'.

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

LA	Asian	Black	Mixed	White	Any other ethnicity
London (total)	22,750	23,327	82,189	46,294	7,016
Barking and Dagenham	1,159	1,018	2,129	1,510	63
Barnet	592	645	3,231	2,556	602
Bexley	316	553	2,221	2,180	36
Brent	988	1,006	2,047	1,083	613
Bromley	271	443	3,631	3,000	63
Camden	440	370	1,465	726	127
City of London	30	7	41	16	5
Croydon	704	1,527	5,263	1,845	108
Ealing	1,241	794	2,966	1,306	833
Enfield	285	1,153	3,457	2,390	260
Greenwich	532	1,432	3,316	2,288	119
Hackney	396	1,395	2,359	1,165	222
Hammersmith and Fulham	142	413	1,456	637	189
Haringey	227	904	2,754	1,527	260
Harrow	1,255	249	1,729	837	173
Havering	435	403	2,268	2,205	40
Hillingdon	1,174	432	3,747	2,049	321
Hounslow	1,357	462	2,108	1,533	447
Islington	204	713	2,457	1,262	212
Kensington and Chelsea	47	251	1,276	427	206

¹⁹ DfE, [Special education needs in England for the 2023-24 academic year](#), 20 June 2024

²⁰ DfE, [Schools, pupils and their characteristics: academic year 2023-24](#), 6 June 2024

²¹ DfE, [Special education needs in England for the 2023-24 academic year](#), 20 June 2024

Kingston upon Thames	310	77	1,711	1,409	119
Lambeth	145	1,613	3,041	1,004	199
Lewisham	239	1,429	3,977	1,445	158
Merton	548	402	2,146	1,289	69
Newham	2,362	1,069	2,595	834	222
Redbridge	1,943	460	2,438	1,041	59
Richmond upon Thames	191	70	2,026	1,506	65
Southwark	248	1,689	3,017	1,305	306
Sutton	465	222	1,977	1,767	66
Tower	2,910	458	2,178	870	134
Waltham Forest	891	676	3,273	1,624	150
Wandsworth	517	739	2,821	1,285	165
Westminster	186	253	1,068	373	405

4.3.3 SEND and links to poverty

The Joseph Rowntree Foundation published research in 2016 that examined the links between SEND and poverty in the UK.²² 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,²³ 28.7 per cent are identified as having SEND. The coincidence of SEND among those currently eligible for FSM is higher than amongst those who are not eligible.

The report also identified that children with SEND are six times more likely to be excluded than peers who do not have SEND; and 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 over 40 per cent higher than in the schools with the least disadvantaged intake.

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

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.²⁴

4.4 Race

4.4.1 London's ethnic profile

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

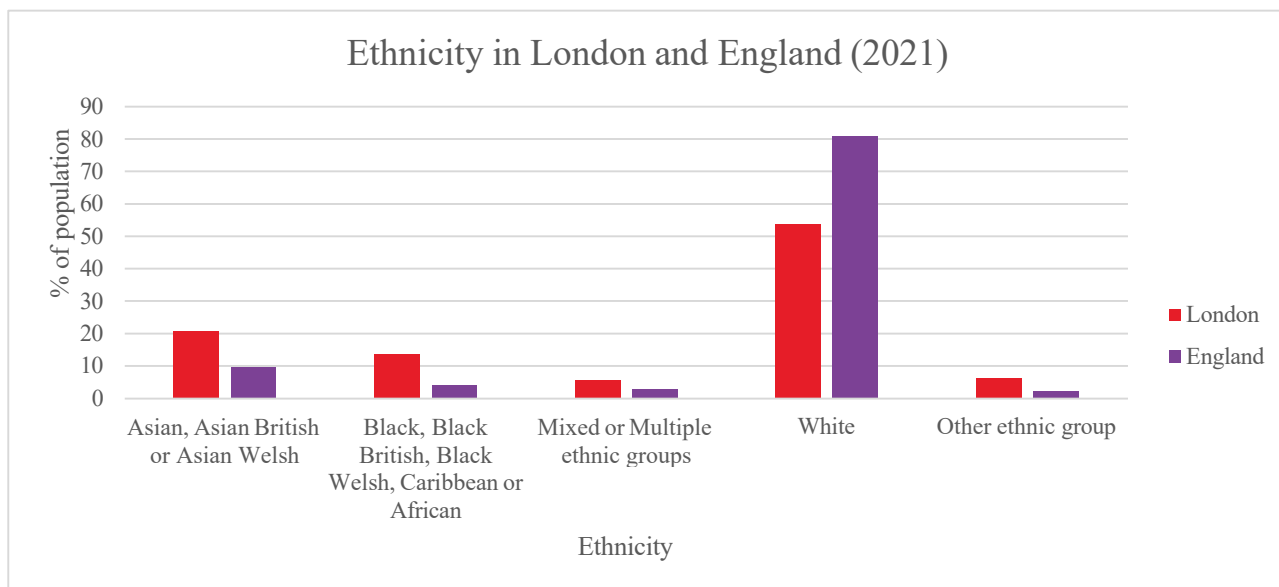
²² Joseph Rowntree Foundation, [Special educational needs and their links to poverty](#), January 2016

²³ Eligibility for FSM is a commonly used proxy for children living in poverty, albeit with widely recognised weaknesses. In 2023-24 this percentage remains similar, at 28.9 per cent.

²⁴ DWP, [Below Average Resources: developing a new poverty measure](#), published 18 January 2024; updated 9 January 2025

English average of 81 per cent. A larger proportion of the population in London identify as Asian, Black, mixed and/or other,²⁵ compared to the rest of England.

Figure 4: Ethnicity in London and England



4.4.2 Primary school pupil ethnicity

According to data from the 2023-24 school year,²⁶ the majority of state-funded primary school pupils (all years, excluding 'unclassified') in London identify as White (272,116 pupils, or 40 per cent); followed by Asian (168,260, or 25 per cent); Black (108,359, or 16 per cent); mixed (85,481, or 13 per cent); and then 'any other ethnic group' (43,614, or 6 per cent).

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%)	85,481 (13%)	168,260 (25%)	108,359 (16%)	43,614 (6%)
Barking and 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

²⁵ ONS, [Ethnic group](#), 2021

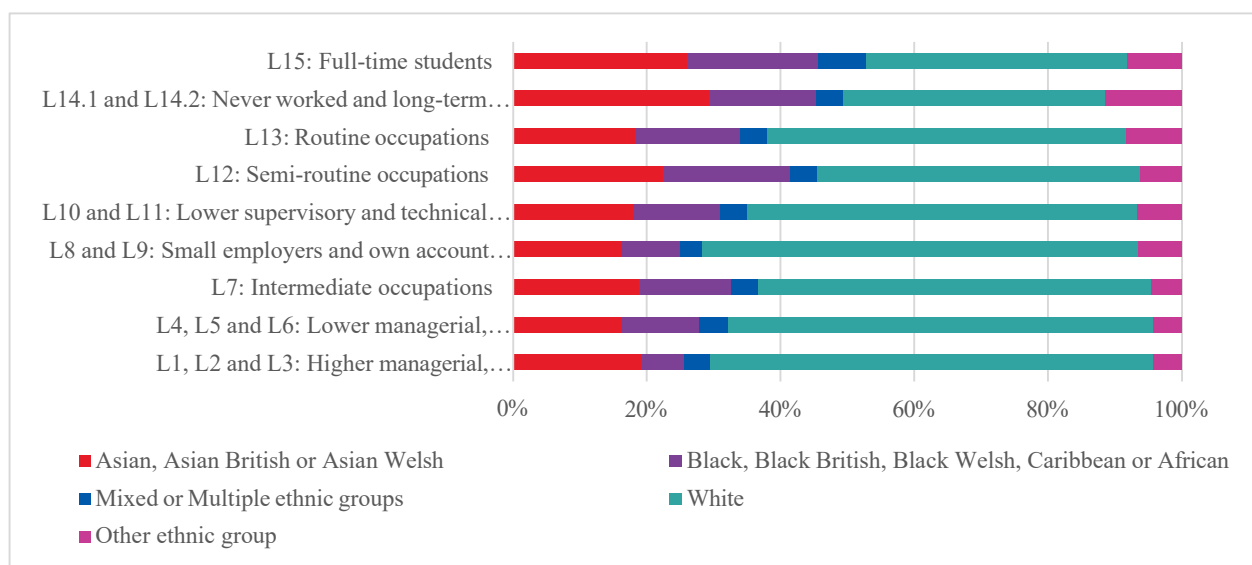
²⁶ DfE, [Schools, pupils and their characteristics: academic year 2023-24](#), 6 June 2024

LA	White	Mixed	Asian	Black	Any other ethnic group
Hammersmith and 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 and 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
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

4.4.3 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).²⁷ 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



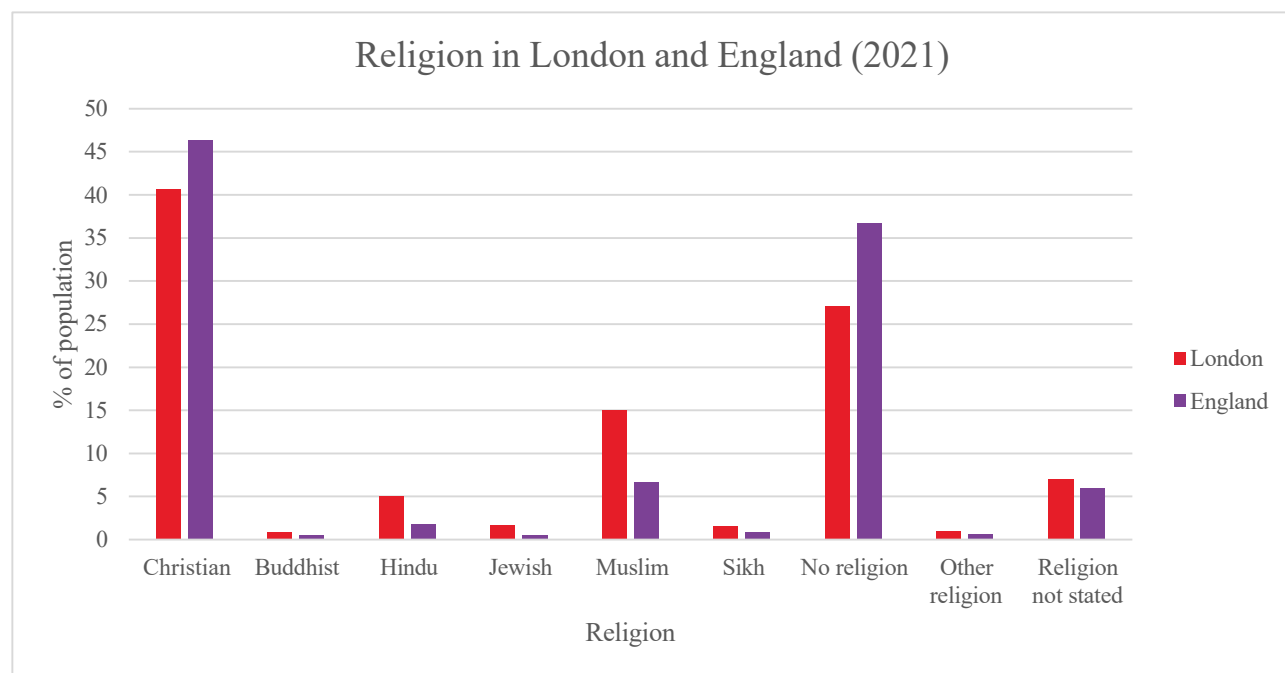
²⁷ ONS, [NS-SeC by ethnic group by sex by age](#), 2021

4.5 Religion or belief

4.5.1 London's religious/belief profile

In terms of religion, **Figure 6** indicates that, as of the 2021 Census, the most common religion in London and England is Christian, though the percentage is slightly lower in London than in England.²⁸ In both cases, there are relatively high levels of those who identify as having no religious faith. The percentage of individuals identifying as either Buddhist, Hindu, Jewish, Muslim, Sikh or 'Other' religion in London is relatively high.

Figure 6: Religion or belief in London and England

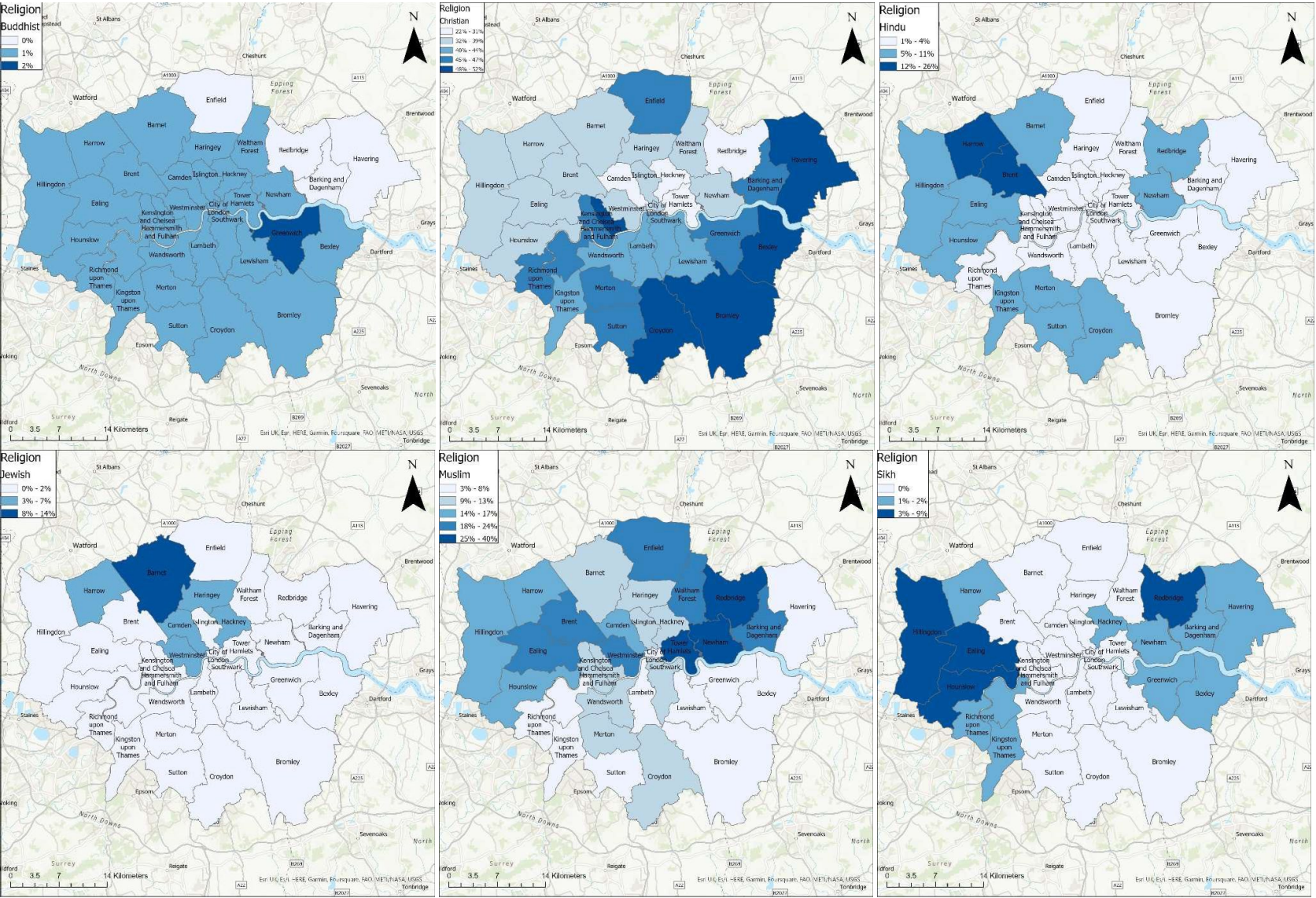


Spatially, there is a relatively large population of Buddhists in Greenwich; a large Hindu community in Harrow; a large Jewish community in Barnet; large Muslim communities in Tower Hamlets, Newham and Redbridge; and large Sikh communities in Ealing, Hillingdon and Hounslow.²⁹ These patterns are mapped in **Figure 7**.

²⁸ ONS, [Religion](#), 2021

²⁹ ONS, [Religion](#), 2021

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



4.5.2 Children's faith

According to Census 2021 data,³⁰ the majority of children aged 7 to 11 in London 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).

This does vary greatly by London borough. Tower Hamlets, Newham and Redbridge all have major populations that identify as Muslim; and Harrow has almost equal populations that identify as Christian, Hindu and Muslim.

Table 3: Faith of children aged 7 to 11 (inclusive) across London, 2021³¹

LA	Buddhist	Christian	Hindu	Jewish	Muslim	No religion	Sikh	Other religions	Religion not stated
London (total)	2,835	203,595	28,860	10,815	126,010	115,840	9,045	3,900	36,670
Barking and Dagenham	0	7,225	540	0	5,930	3,290	370	15	985
Barnet	205	8,185	1,110	5,185	4,425	4,205	90	255	2,160
Bexley	110	7,320	705	0	980	6,015	355	20	935
Brent	95	7,205	2,640	210	6,965	1,655	60	165	1,285
Bromley	90	9,075	830	0	940	8,515	65	35	1,570
Camden	10	3,135	170	515	2,935	2,455	0	55	880
City of London and Westminster	40	2,925	145	210	2,950	1,295	0	10	730
Croydon	85	11,740	1,570	0	4,005	5,920	100	110	1,775
Ealing	200	7,930	1,760	30	6,650	3,305	1,705	100	1,485
Enfield	80	10,000	580	125	6,330	3,965	85	740	1,520
Greenwich	165	8,465	780	0	2,510	5,410	160	60	1,125

³⁰ 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>

³¹ Note totals across boroughs may not add up to London total due to rounding.

Hackney	85	4,600	50	2,040	2,960	3,380	135	225	1,670
Hammersmith and Fulham	20	4,400	85	65	1,930	1,800	0	20	725
Haringey	60	5,665	135	1,110	2,645	3,790	25	285	1,315
Harrow	120	4,640	4,435	205	4,130	1,220	160	385	1,010
Havering	50	7,415	430	60	1,430	5,745	330	20	885
Hillingdon	130	6,485	2,445	20	4,660	3,615	1,895	155	995
Hounslow	205	6,665	1,815	0	4,775	2,990	1,490	120	1,075
Islington	0	3,670	40	105	2,450	2,930	0	140	730
Kensington and Chelsea	0	3,235	55	150	1,125	1,225	0	20	625
Kingston upon Thames	60	4,285	550	0	1,190	3,525	95	0	785
Lambeth	30	7,470	135	0	2,440	3,800	0	50	1,240
Lewisham	110	8,100	480	10	2,190	5,580	40	70	1,445
Merton	80	6,135	945	15	1,880	3,180	30	25	935
Newham	75	6,805	1,225	0	12,010	1,835	250	30	1,305
Redbridge	85	5,125	2,400	200	9,490	1,955	1,085	130	1,160
Richmond upon Thames	35	6,100	335	75	790	4,800	135	60	1,010
Southwark	75	7,700	115	0	2,785	4,240	0	25	1,070
Sutton	105	5,825	1,425	0	1,475	4,790	0	80	885
Tower Hamlets	55	2,685	180	0	12,425	1,520	10	15	840
Waltham Forest	95	6,045	380	40	5,505	3,620	65	125	1,340
Wandsworth	35	7,360	310	80	3,120	4,255	40	40	1,195

4.5.3 Faith schools

Across London, there are 1,787 state-funded primary schools, with a total of 691,212 pupils. Of these 1,787 schools, 512 have been categorised as religious character schools (the remaining 1,275 schools have not indicated religious character, or have indicated this does not apply to them).³² There are a number of state-funded primary schools of particular religious character. Categories include:

- Christian (131,927 pupils)³³
- Hindu (1,716 pupils)
- Jewish (6,836 pupils)
- Muslim (2,773 pupils)
- Sikh (562 pupils).

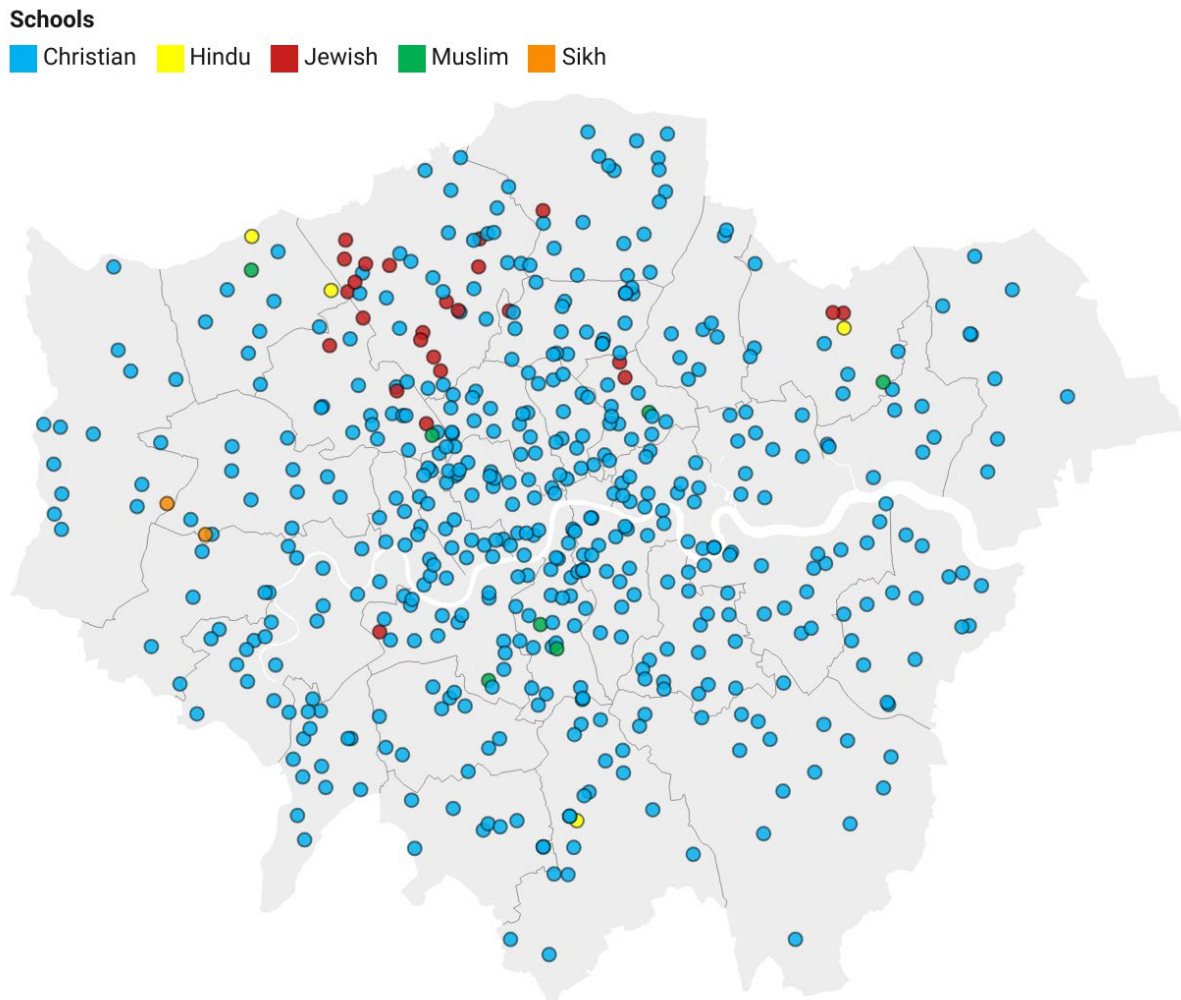
Across London, there are 474 state-funded primary Christian schools (including Catholic, Roman Catholic, Church of England and Christian); four Hindu schools; 25 Jewish schools; seven Muslim schools; and two Sikh schools. There are 143,814 pupils across these schools – they make up approximately 21 per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

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

Jewish schools are concentrated in the north-west of London, particularly in LB Barnet and LB Brent. Sikh schools are concentrated in the west of London, in LB Ealing and LB Hillingdon.

³² DfE, [Get Information about Schools](#), last updated 4 February 2025

Figure 8: Spatial distribution of religious state-funded primary schools in London by their religious character, 2023-24



Map data: © Crown copyright and database right 2018 • Created with Datawrapper

4.5.4 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, onion and other foods that stimulate the senses. While eating meat is not prohibited, many Hindus avoid it. Eating beef 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 are from.

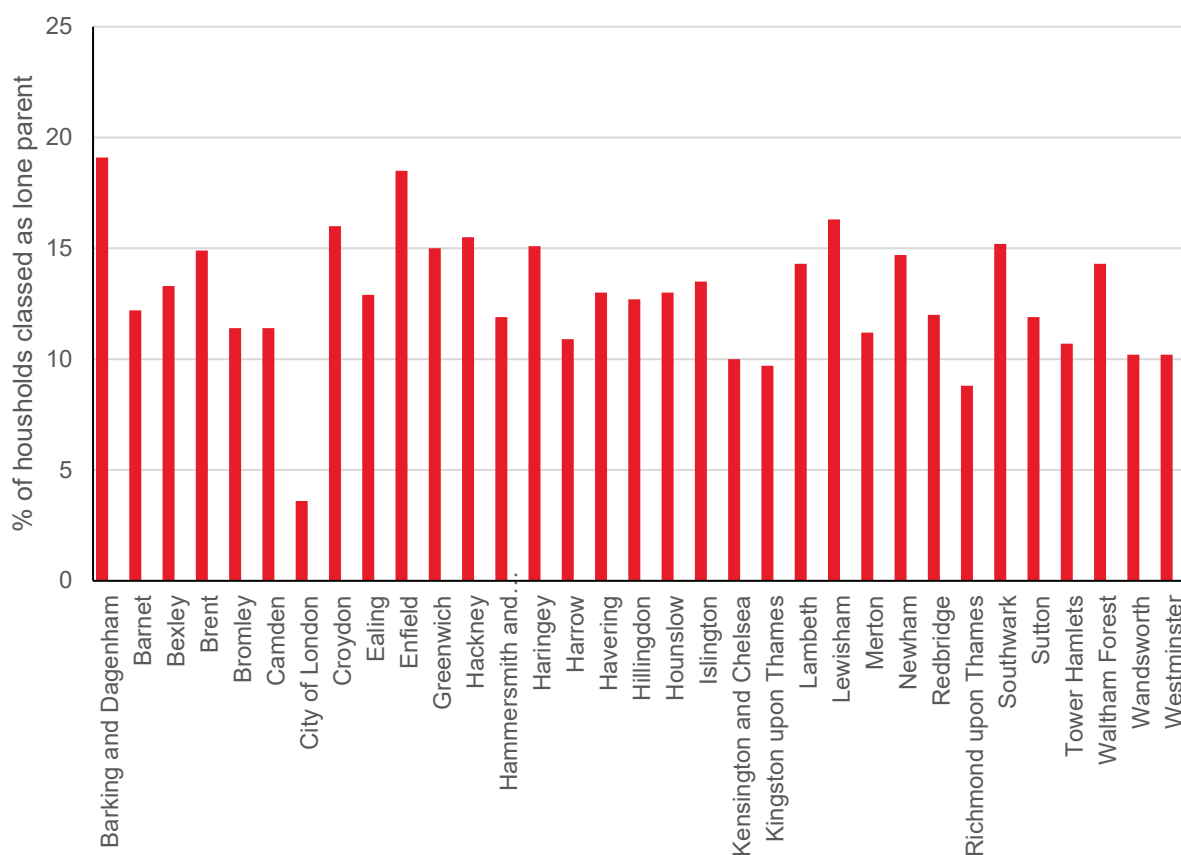
Sikhism: Although dietary practices vary from person to person, most Sikhs eat meat as long as it is not prepared according to Kosher or Halal methods.

4.6 Socio-economic data

4.6.1 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.³⁴ Barking and Dagenham (19.1 per cent) and Enfield (18.5 per cent) have the highest proportion of lone-parent households in London, whereas the City of London has the lowest proportion (3.6 per cent) (**Figure 9**).

Figure 9: Proportion of households classed lone parent households in London LAs, 2021



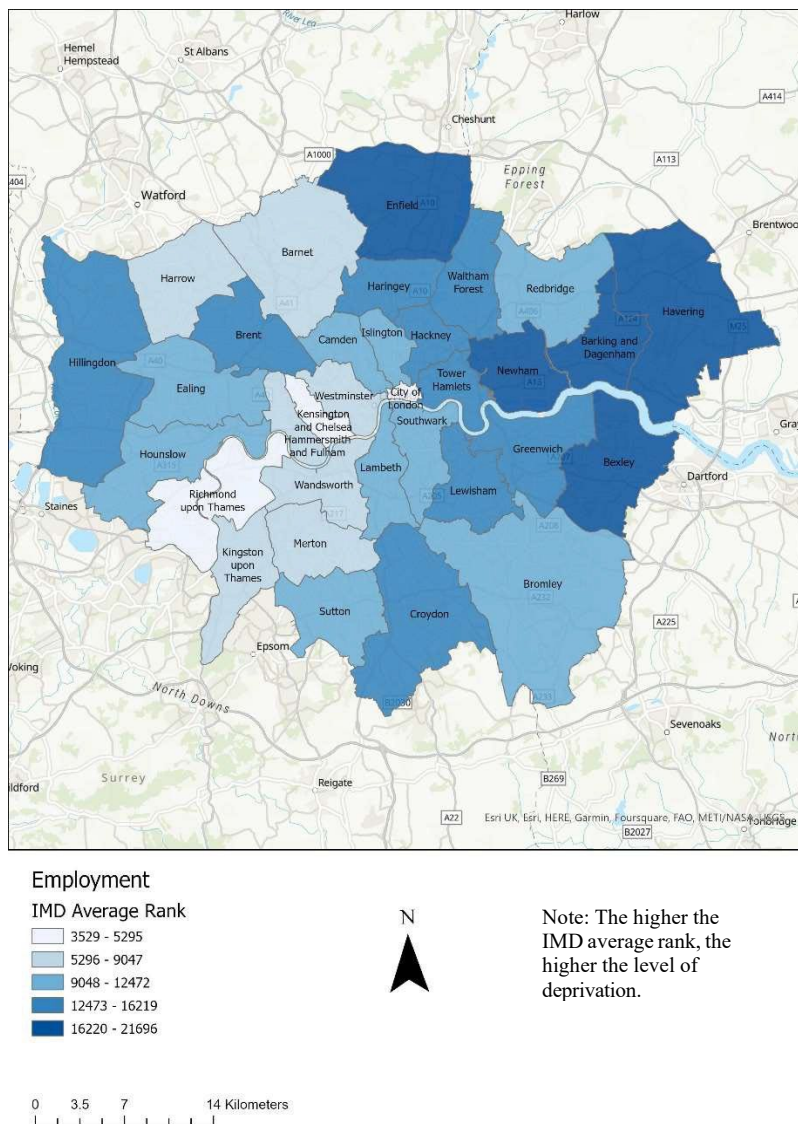
4.6.2 Employment deprivation

The IMD employment domain measures the numbers of adults involuntarily excluded from the labour market. Employment deprivation across the London boroughs is illustrated in **Figure 10**. This shows employment deprivation in London is greatest within the eastern-most boroughs, and in Enfield in the central north.³⁵

³⁴ ONS, [Household composition](#), 2021

³⁵ MHCLG, [Indices of Deprivation – Employment deprivation](#), 2019

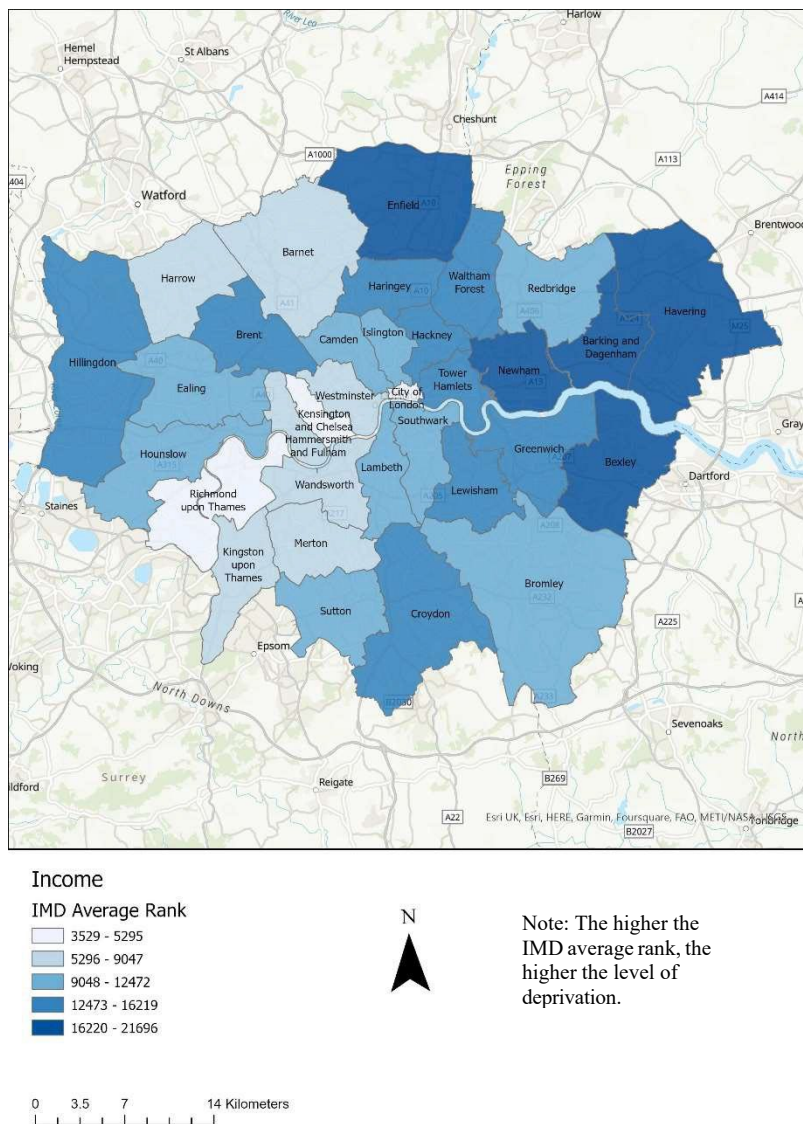
Figure 10: Employment deprivation in London (2019)



4.6.3 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 north (**Figure 11**).³⁰

Figure 11: Income deprivation in London (2019)



4.6.4 Children living in low-income households.

In 2022-23, 16 per cent of children in London were reported to be living in low-income households. This is 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).³⁶ The GLA has mapped this data at a more granular ward level across London (**Figure 12**).³⁷

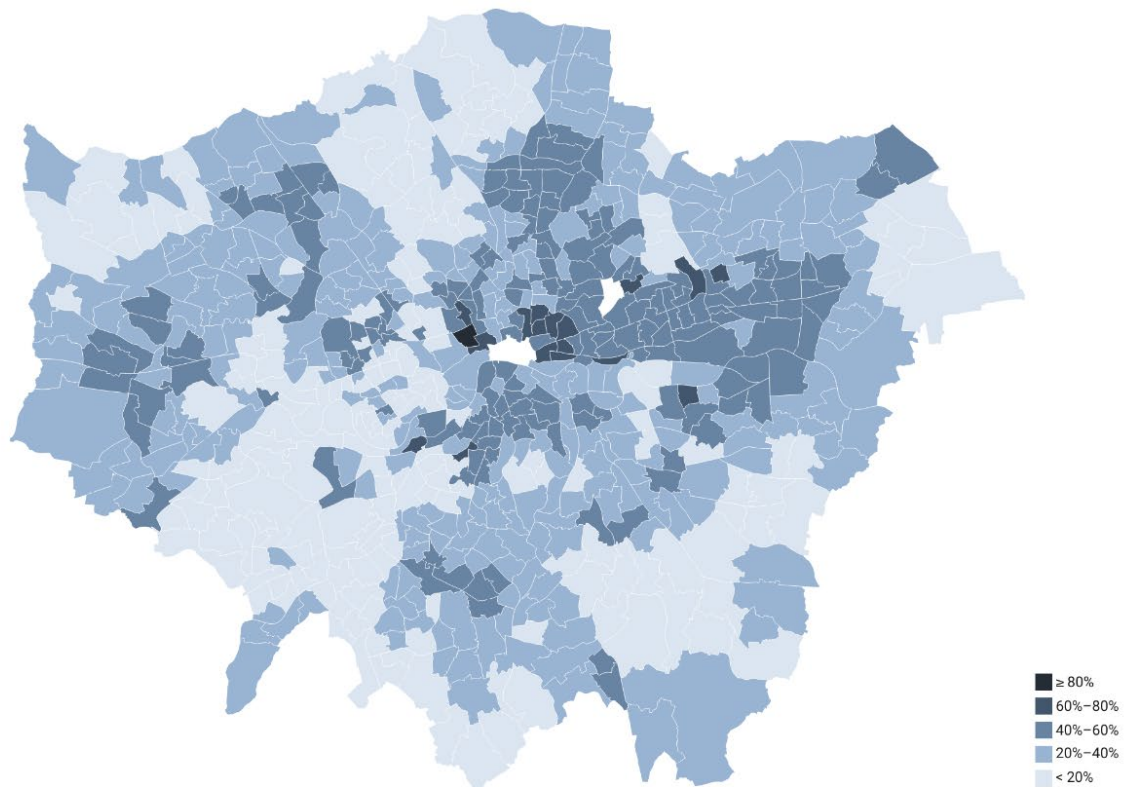
³⁶ LG Inform, [Proportion of children aged 0-15 in relative low income families in England](#), 30 November 2024

³⁷ GLA, [Children in low-income families](#), 2024

Figure 12: Percentage of children in low-income families across London's wards (2022-23)³⁸

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

4.6.5 Number of Londoners living below the poverty line

Between in 2020-21 and 2022-23, around 2.2m Londoners (24 per cent) were in relative poverty after taking housing costs into account.³⁹ The poverty rate was 27 per cent across inner London, and 23 per cent across outer London.⁴⁰ This is the lowest-recorded London poverty rate in 25 years. Despite this apparent improvement, the overall London poverty rate of 24 per cent remains higher than that of the UK (22 per cent). The poverty rate in London is also highest for children compared to other age groups, at 32 per cent.⁴¹

4.6.6 London Living Wage

In April 2023, 13.3 per cent of London employee jobs were paying below the LLW.⁴²

The proportion of employees earning less than the LLW varies considerably across the boroughs. As of April 2023, it was more than 20 per cent in Barking and Dagenham, Barnet, Bexley, Brent, Bromley, Ealing, Greenwich, Haringey, Harrow, Redbridge, Sutton,

³⁸ GLA, [Children in low-income families](#), 2024

³⁹ London Datastore, [Economic Fairness: Population in Poverty](#), 2024

⁴⁰ DWP, [Households below average income: for financial years ending 1995 to 2023](#), 21 March 2024

⁴¹ London Datastore, [Economic Fairness: Population in Poverty](#), 2024

⁴² GLA, [State of London](#), June 2024

and Waltham Forest. It was less than 10 per cent in Camden, City of London, Islington, Southwark, Tower Hamlets and Westminster.⁴³

4.6.7 Benefit cap

According to DWP data, over 233,000 households in London had their 'benefits capped to May 2024'. This represents approximately one-third of all British households with benefits capped. Most of these London households were in Enfield and Brent, followed by Ealing, Barnet and Newham. Households in the City of London, Kensington and Chelsea, Bexley, Bromley, Kingston upon Thames, Merton, Richmond upon Thames and Sutton had limited benefits capping (less than 4,000 households).⁴⁴

4.6.8 Cost of living

According to the Cost-of-Living Tracker,⁴⁵ London households with the lowest incomes are predicted to have a 27 per cent increase in the cost of goods and services by June 2024, compared to the three years leading up to March 2020.

Outputs from the GLA cost-of-living poll⁴⁶ between January 2022 and August 2024 indicate that over this time, the numbers stating that they are 'financially struggling' has increased from around 12 per cent to 18 per cent.

4.6.9 Food security

The Survey of Londoners has published data on food security in London.³⁷ As of 2021-22, 14 per cent of parents or guardians in London have children (those under 16), in their household, living in low or very low food security. 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 and East are most likely to have children living in low food security (32 per cent).

4.6.10 Carers and employment

According to the DWP Family Resources survey 2022-23,⁴⁷ 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 Report⁴⁸ estimated 28 per cent of carers in the UK were living in relative poverty in 2021-22.

4.7 School demand and attendance

4.7.1 School places

Demand for places in London's state-funded schools is anticipated to decrease in coming years, in line with projected reductions in the population of children resident in the city. Most London boroughs expect to see a decline in pupil numbers at Reception age, from

⁴³ ONS, [Employees earning below the London Living Wage](#), 2023 (provisional)

⁴⁴ DWP, [Benefit Cap statistics](#), May 2024.

⁴⁵ GLA London Datastore, [GLA cost of living polling](#), 2024

⁴⁶ GLA London Datastore, [GLA cost of living polling](#), 2024 (accessed 20 November 2024)

⁴⁷ DWP, 2024, [Family Resources Survey: financial year 2022 to 2023](#), Care Data tables, table 5.4.

⁴⁸ Joseph Rowntree Foundation, [UK Poverty 2024: the essential guide to understanding poverty in the UK](#), 23 January 2024

2023-24 to 2027-28. Over this period, an average 4.4 per cent drop in demand for Reception places is forecast across London – this masks some larger decreases, including seven boroughs in London that are forecasting a decrease of over 10 per cent. There are a few areas of growth, particularly in two outer London boroughs. If the four areas of growth are excluded, the remaining boroughs are forecasting a 5.9 per cent drop in demand for Reception places. Inner London boroughs are expected to experience the most intense drop in demand.⁴⁹

4.7.2 School absence and attendance rates

According to 2022-23 data,⁵⁰ attendance rates across the LAs ranged between 93 per cent and 95 per cent. The boroughs with the highest proportions of absence in state-funded primary schools are Newham (7.3 per cent) and Westminster (7.1 per cent). The lowest absence rates are in Richmond upon Thames (4.8 per cent) and Kingston upon Thames (5.2 per cent).

4.8 Free school meals

4.8.1 FSM eligibility

According to 2023-24 school year data, 25 per cent of London's state-funded primary school pupils are known to be eligible for FSM.⁵¹ The English average is 24.3 per cent. The proportion of London state-funded primary school pupils eligible for FSM is highest in Camden (42.8 per cent), followed by Islington (42.5 per cent) and Hackney (39.3 per cent). London boroughs with the lowest proportion of pupils eligible for FSM are Richmond upon Thames (12.4 per cent), Harrow (14.2 per cent) and Kingston upon Thames (14.5 per cent).

4.8.2 FSM uptake

According to 2023-24 data, 85 per cent of eligible pupils in London's state-funded primary schools take government-funded FSM, compared to 81 per cent across England.⁵² The percentage of eligible pupils in London taking FSM is considerably lower in the City of London, at just 43 per cent – although there are very few eligible pupils in this area's state-funded primary schools. The highest percentage of eligible pupils taking FSM is in Enfield, at 92 per cent.

4.8.3 FSM and ethnicity

According to 2023-24 data, 32 per cent of London's FSM-eligible state-funded primary school pupils identify as White (54,666 pupils). This is followed by pupils identifying as Black (43,723), Asian (29,614), mixed (26,311), and then 'any other ethnic group' (14,634).⁵³

Whilst the majority of state-funded primary school pupils eligible for FSM in London

⁴⁹ London Councils, [Managing falling school rolls in London](#), 29 January 2024

⁵⁰ DfE, ['Absence rates by geographic level - full academic years' from 'Pupil absence in schools in England'](#), created 24 June 2024

⁵¹ DfE, ['FSM eligibility by ethnicity or national curriculum year group' from 'Schools, pupils and their characteristics'](#), created 24 June 2024

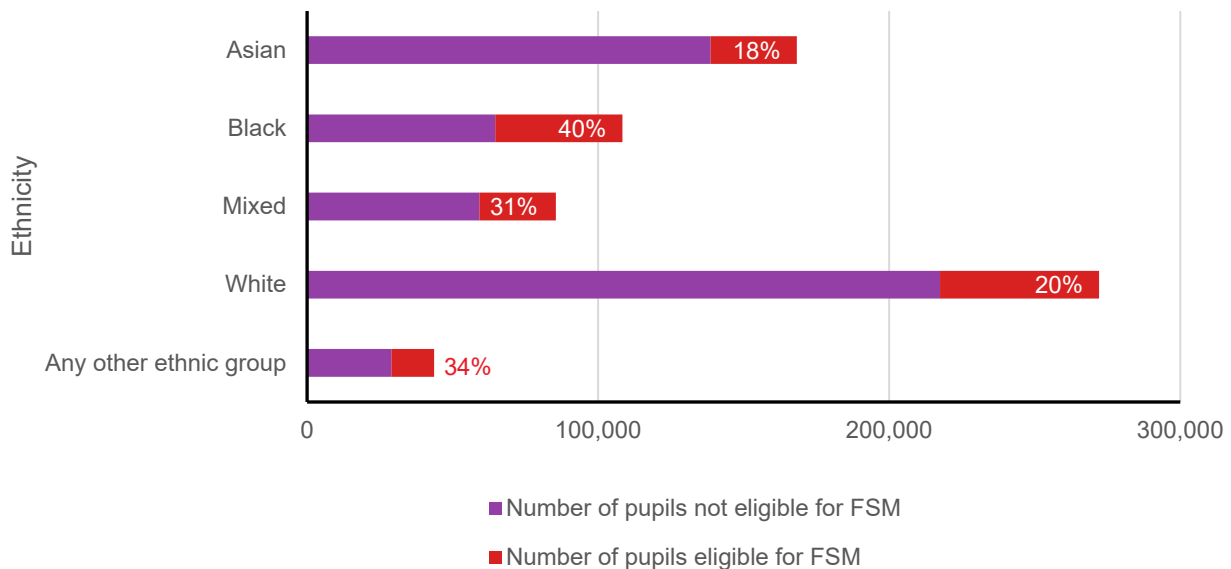
⁵² DfE, ['Pupil characteristics – number of pupils by FSM eligibility' from 'Schools, pupils and their characteristics'](#), created 24 June 2024

⁵³ DfE, ['FSM eligibility by ethnicity or national curriculum year group' from 'Schools, pupils and their characteristics'](#), created 24 June 2024

identify as White, 40 per cent of pupils who identify as Black are eligible for FSM in these schools (see Figure 13); this is the highest proportion of any ethnic group. This is followed by pupils identifying as ‘any other ethnic group’ (34 per cent of pupils from this group are eligible for FSM), mixed (31 per cent), White (20 per cent) and Asian (18 per cent).

Figure 13: 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 pupils that are eligible for FSM, out of all pupils identifying as the same ethnicity. For example, 20 per cent of pupils identifying as White are eligible for FSM.



4.8.4 FSM and educational attainment

London schools record higher GCSE scores than those from any other region.⁵⁴ The average “Attainment 8” score, which gives a score across various core and optional elements, is more complex than the 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 2023-24, pupils eligible for FSM in England achieved an average score of 34.7, compared to 49.7 for non-eligible pupils. In London, pupils eligible for FSM achieved an average score of 42.1, compared to 54.3 for non-eligible pupils.

4.9 Independent schools

Independent schools, or private schools, charge fees to attend instead of being funded by the government. Pupils do not have to follow the [national curriculum](#).

⁵⁴ DfE, [Key stage 4 performance, academic Year 2023/24](#), 5 December 2024

In 2023-24 there were 51,264 pupils aged 7-11 studying at independent schools in London.⁵⁵

As previously stated, the Mayor's UFSM scheme only includes government-funded schools and NMSSs in 2025-26. The policy has been developed in line with the parameters set by the national policies for FSM and the government-funded Universal Infant Free School Meals offer (covering state schools only).⁵⁶

Independent schools can broadly be defined as "association" and "non-association" schools, and are regulated by either Ofsted or the Independent Schools Inspectorate.

Within these broad categories relating to the regulation of the schools, there are further subcategories of independent schools. These include independent special schools and independent faith schools.

Further analysis of independent faith schools in London can be found in the Independent Schools Analysis.

There is no central register showing inclusion of meals in school fees. A sample method analysis shows that most (but not all) independent schools include the costs of meals in their termly fees.⁵⁷ Other schools request that parents keep a meals account topped up with funds, which pupils can draw on by swiping a card each day.

⁵⁵ DfE, [Schools, pupils and their characteristics: academic year 2023-24](#), 6 June 2024. The DfE data breaks down independent schools in London only by certain characteristics, it does not breakdown by key stage two.

⁵⁶ Further information on the scheme's approach to independent schools can be found in Supplementary analysis on London school sector.

⁵⁷ Supplementary analysis on London school sector.

5. Consultation and engagement

Stakeholder engagement is a key part of an Integrated Impact Assessment (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 London boroughs 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 representatives of LBs 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, that 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 to the invitation expressing an interest in the policy and the workshop; 22 accepted the workshop 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**.

The engagement, ahead of the policy launch, took place between February and July 2023, via the online surveys, workshops and webinars, and telephone interviews. The themes raised here 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:

- At a borough level, most boroughs reported no additional costs for halal meals. Some boroughs reported halal meat can be more expensive, but is readily available in the school food supply chain. Schools often choose to be pork-free and/or cook with halal meat only, to meet the needs of their whole school community with the same menu. Boroughs with both high populations, and

relatively low populations, of Muslim children were engaged with.

- In areas with high proportions of Muslim pupils, caterers reported that, due to a high demand for halal meat, they have negotiated lower costs (due to economies of scale) with suppliers. This means there is currently no difference in price between halal and non-halal meat. However, the GLA will keep a watching brief on this topic.
- For boroughs with a high number of Jewish children, kosher meals often incur an additional cost. The cost of this type of meal was reported as £3.27. 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 particular meals is variable, but tends to be higher.
- In some cases, SEND schools offer the same meals as mainstream primary schools. This means there is no cost difference for the meal, but there is considerable extra cost for staff in special schools.
- Some caterers reported that special provision is not currently made for kosher, and in some schools, for specific dietary requirements.

Ongoing engagement

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 head teachers; two online communities with 40 parents, and their children; and termly opinion polling with around 300 parents. To build understanding of other schemes and impacts, the UFSM team has continued to engage experts from the school food and health sectors; academics; researchers; and other cities. The UFSM evaluation partners have undertaken surveys with 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 PP, 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 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 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
- the Partnership Advisory Group, which provides guidance and expert input into the development and implementation of the UFSM policy; members include representatives (senior officers – e.g., the Directors of Education) from each of the 33 London boroughs
- insight work, 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 leads network, etc.

6. Assessment

A qualitative assessment has been undertaken of potential disproportionate and differential effects, both positive and negative, that could result from implementing 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 on how any potential adverse equality effects may be mitigated, and any potential positive equality effects enhanced.

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
Age	<p>There is evidence of an association between good-quality diet and positive mental health and wellbeing in children (O'Neil et al., 2014;⁵⁸ Khalid et al., 2016⁵⁹).</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</p>	None identified.	<p>Positive impacts on children aged 7-11, who will continue to benefit from FSM and from the advantages for nutrition, mental health and wellbeing, and academic learning and attainment that this will bring. This will continue to bring the greatest benefits for those children from poorer households who may have missed out before the Mayor's universal offer was introduced.</p> <p>There are potential benefits for other children living in households with children who qualify for UFSM. They may benefit from increased money being available to spend on food for other children in the household, including pre-schoolers and older siblings.</p>	

⁵⁸ 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

⁵⁹ 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

	<p>is critical (UNICEF, 2019⁶⁰).</p> <p>Households with more children are more likely to experience food insecurity among children (see section 3.6.9).</p>		<p>Also, benefits for adults (parents or carers) who may often prioritise food provision for their children, rather than themselves. This could have benefits for overall health and wellbeing of older age groups, and potentially reduce diet-related ill health.</p> <p>Benefits for households with a greater number of children. The eligibility threshold for FSM does not take account of the number of children in a household. If they do not fall within the threshold, then financially they have to pay for school meals for all children. This means that, before the Mayor's universal offer, household finances had to stretch to provide more meals; and the quality and quantity of these are likely to be more impacted.</p> <p>For London boroughs who already provided UFSM to all primary school children, before the Mayor's scheme was introduced, they will continue to receive funding. This will allow them to reinvest into areas that will benefit families most in need – for example, UFSM to secondary school pupils, or enhanced holiday meal provision. This will bring benefits to a wider range of children or varying age groups.</p> <p>For boroughs not able to offer wider provision beyond primary UFSM, there could be potential negative impacts – for example, where a pupil transitions to secondary school and is no longer eligible for FSM, having received them under the Mayor's universal offer.</p> <p>The GLA Arbor data (from a sample of 13 per cent of schools) shows that uptake decreases in higher</p>	
--	--	--	--	--

⁶⁰ UNICEF (2019). The State of the World's Children 2019. Children, Food and Nutrition: Growing well in a changing world. UNICEF, New York.

			<p>year groups: 92.2 per cent of Year 3 pupils eligible for the Mayor's scheme took FSM; this dropped to 90.1 per cent for Year 4 pupils, 89.5 per cent for Year 5 and 88.1 per cent for Year 6.</p> <p>The Year 1 evaluation by IoUH found that London UFSM:</p> <ul style="list-style-type: none"> • helps to tackle child poverty, with a disproportionately positive impact on families with children aged 7-11 on lower incomes – alleviating hunger, and freeing money for household essentials • breaks down barriers to opportunity: children are more ready to learn, and school-family relationships are improved by reducing dinner money debt • improves nutrition – especially for families living on low incomes with less access to the food they need to thrive • helped with children's readiness to learn. Parents, school staff and children in most schools noticed positive shifts in concentration and energy levels. 34 per cent of parents felt that UFSM means their child can concentrate better in lessons. <p>Future evaluation into the challenges and barriers that older pupils face with taking up meals is being conducted.</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 which 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,</i>	<p>Across London there are 160 state-funded SEND schools (see section 3.3.1).⁶¹</p> <p>Spatially, SEND schools are evenly distributed across all London boroughs.</p> <p>In in 2023-24, there were 1,332 Year 3 SEND pupils in state-funded special schools in London. This was slightly higher for Year 4 at 1,360, and for Year 5 at 1,365. At Year 6, there are 1,342 pupils (see section 3.3.1). For Years 3-6, Croydon had the most pupils with SEND in state-funded special schools (355).</p> <p>In January 2024, there were 260,000 pupils with SEND in London. This is 21 per cent higher than in January 2019. The number of London pupils in London issued with an EHCP has risen even more starkly: in January 2024 there were 90,000</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, is unknown.</p> <p>Ongoing investigation around the pricing of meals for different SEND needs will be useful for informing the whether</p>	<p>Under the Mayor's scheme, UFSM is available to more children in Years 3-6 at state-funded schools, including children with SEND. This will continue to benefit pupils with SEND and their 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, there is often a need for foods to be pureed. Economies of scale are tight, given the relatively small pupil numbers within these schools. Top-up funding has been offered in years one and two of the scheme, to support schools needing to purchase specialist equipment for SEND children, or incurring an additional cost.</p> <p>SEND children in mainstream schools are more likely to have specific dietary needs, whether related to food allergies, intolerances or phobias that are not necessarily catered for, and who 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</p>	<p>Continue to closely monitor any implementation issues for SEND schools.</p>

⁶¹ [Special education needs in England, academic year 2023/24](#), 20 June 2024

<p><i>progressive, organ specific, developmental, learning difficulties, mental health conditions and mental illnesses, produced by injury to the body or brain. Persons with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled persons from the point of diagnosis.</i></p>	<p>such pupils, 57 per cent up from January 2019.⁶²</p> <p>FSM eligibility in children with SEND in state-funded primary schools in London was 16 per cent higher than for children without SEND (see section 3.3.2).</p> <p>Based on the 2023-24 national statistics for SEN, 38 per cent of children in London's state-funded primary schools with SEN support and an EHCP are eligible for FSM. This is slightly below the national average of 39 per cent (see section 3.3.2).</p> <p>In the 2024-25 academic year, there were three NMSSs in London – 31 pupils at these schools were eligible for the Mayor's scheme.</p> <p>There is 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 all state-funded schools in London, are not eligible for the government's UFSM.</p> <p>Children of disabled parents are</p>	<p>the new price per meal of £3.00 is adequate to cover provision. Future evaluation of the challenges and barriers that SEND pupils face with taking up meals is being conducted, which will look to investigate this.</p>	<p>ensure that they do not miss out.</p> <p>The IoUH external evaluation of year one of the scheme found that the school food system has often struggled to meet the requirements of children with SEND. These challenges predated the introduction of the policy, but could in some cases be heightened by the policy. It made the following findings:</p> <ul style="list-style-type: none"> • In some schools, school staff working with pupils with SEND told evaluators about specific needs and requirements that, when they're not met, can create anxieties or concerns for their pupils. • Some parents of SEND children also felt that, since the policy's introduction, their children's dietary needs were not being met. • Children in one special school shared their views about the food on offer. Responses were mixed with some reporting there wasn't enough food, and that meals were sometimes cold. Pupils also wanted more opportunities to tell the caterers what they liked. However, some enjoyed the food and the chance to sit with their friends and teachers. • Despite these concerns, parents of children with SEND across mainstream and special schools were grateful for the financial help the UFSM policy provided their family. Staff echoed this, recognising that children with SEND were more likely to come from families facing poverty, financial hardship and vulnerabilities. • The fact that the policy gave children with SEND 	
--	---	---	---	--

⁶² London Councils and Mime, [Inclusion in London's Schools](#), November 2024

	<p>more likely to experience food insecurity (see section 3.6.9).</p> <p>There are strong links between conditions such as attention deficit hyperactivity disorder (ADHD), and autism and avoidant restrictive food intake disorder (ARFID).⁶³</p> <p>A report by the 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.⁶⁴</p> <p>Data from Arbor, collected by the GLA from schools, suggests that take-up was similar between pupils with SEND (88 per cent) and pupils without SEND (90 per cent).</p> <p>Alongside the provision of funding through the UFSM scheme, there are other funding sources available to support SEND pupils. State-funded SEND schools receive additional funding overall, with an expected percentage of that anticipated to go towards food provision. In addition, children</p>		<p>opportunities to try new foods was seen as a clear benefit by some school staff and parents - particularly as cost or the need for routine made this challenging, day-to-day, for families.</p>	
--	---	--	--	--

⁶³ Avon and Wiltshire Mental Health Partnership, [Avoidant restrictive food intake disorder \(ARFID\)](#) , updated 31 January 2022; accessed 28 June 2023

⁶⁴ DWP, [Below Average Resources: developing a new poverty measure](#), published 18 January 2024; updated 9 January 2025.

	with an EHCP who need assistance with eating and special diets should have this covered within the health part of their EHCP.			
--	---	--	--	--

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.	
Race <i>This includes ethnic or national origins, colour or nationality, and includes refugees and migrants, and Gypsies and Travellers.</i> <i>Refugees and migrants means people whose intention is to stay in the UK</i>	<p>London is more ethnically diverse than England. In London, 54 per cent of individuals identify as White – this 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, compared to the rest of England (see section 3.4.1).</p> <p>According to 2023-24 school year data, the majority of state-funded primary school pupils (all years, excluding ‘unclassified’) in London</p>	<p>Data is currently lacking on uptake of UFSM, by ethnic group, in London boroughs that have already implemented the policy.</p>	<p>All children who meet the current FSM eligibility criteria will now receive FSM. The process under the national FSM scheme meant parents had 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 continue to 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 eligibility criteria.</p> <p>Although a scheme to make FSM available to these families was introduced during COVID-19,</p>	<p>Monitoring uptake of UFSM by ethnic group, during the pilot, would provide useful information for any future policy intervention of this nature.</p>

<p><i>for at least twelve 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>identify as White (272,116 pupils, or 40 per cent). This is followed by Asian (168,260, or 25 per cent), Black (108,359, or 16 per cent), mixed (85,481, or 13 per cent) and then ‘any other ethnic group’ (43,614, or 6 per cent) (see section 3.4.2).</p> <p>Whilst the majority of pupils eligible for FSM identify as White, 40 per cent of pupils who identify as Black are eligible for FSM in London. This is the highest proportion of any ethnic group. This is followed by pupils identifying as ‘any other ethnic group’ (33 per cent), mixed (31 per cent), White (20 per cent) and Asian (18 per cent) (see section 3.8.3).</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>There is a higher percentage of people from ethnic groups other than White in lower-grade jobs; these would</p>		<p>and permanently extended to all households with NRPF in January 2023,⁶⁵ this still requires the completion of an application form. UFSM continues to ensure that those families who are generally amongst the poorest households, but also generally higher levels of ethnic minority groups, would automatically benefit from an 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 suggest that many schools, particularly in ethnically diverse areas of London, already cater well for cultural/faith dietary needs – including, for example, the use of halal meats in communities with a high percentage of Muslim students.</p> <p>According to the year-one IoUH evaluation, some parents felt strongly that schools should make sure lunches reflected the culture and preferences of the school community, to further increase the take-up of UFSM. The evaluation found this wasn’t always happening. With regard to children not regularly eating school lunches, 52 per cent of parents responding to the survey think more options like the food children eat at home would encourage them to eat lunch more often. The evaluation found this wasn’t always happening; and that this affected Black or minority ethnic children the most. These communities are more likely to be living in poverty</p>	
--	---	--	--	--

⁶⁵ DfE, [Guidance: Providing free school meals to families with no recourse to public funds \(NRPF\)](#), updated 29 October 2024

	generally be less well paid (see section 3.4.3).		<p>and face intersecting disadvantages: 47 per cent of Black or minority ethnic children in London are living in poverty, compared to 24 per cent of White children. The report concludes that some families cannot make the most of the policy, and require further explorations and attention to make sure all children can access meals.</p> <p>Families in more marginalised communities, and those facing hardship, also reported worrying about being perceived as ungrateful. They felt unable to speak out about the food that was on offer, as they didn't want the policy to be taken away. This prevented them from raising concerns about the appropriateness and quality of the food available. Further evaluation work is taking place to explore the challenges faced by groups where uptake is lower; guidance will be co-produced to support uptake.</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>	
--	--	--	--	--

<p>Religion or belief</p> <p><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.</i></p> <p>See also GLA supplementary paper to this EqIA.</p>	<p>The percentage of individuals identifying as 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>The majority of London children aged 7 to 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) (see section 3.5.2).</p> <p>Across London, there are 474 Christian schools (including Catholic, Church of England and Christian), four Hindu schools, 25 Jewish schools, seven Muslim schools and two Sikh schools. The total number of pupils in these schools amounts to 143,814: approximately 21 per cent of all primary school pupils in London (see section 3.5.3).</p> <p>Spatially, the distribution of schools shown in Figure 8 indicates an even</p>	<p>Data is lacking on primary school pupil numbers by faith, outside of faith-based state-funded schools.</p> <p>Data is currently lacking on uptake of UFSM, by faith group, in London boroughs that have already implemented the policy.</p> <p>It is worth noting that not all students may follow their faiths dietary customs; and therefore demand may be lower than anticipated.</p> <p>No robust</p>	<p>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 no additional costs for providing halal meals. However, this may vary from school to school, and according to the number of students of Muslim faith within a school (potential economies of scale). Evidence suggests a mixed approach to meal provision for those of Muslim faith, e.g., most schools offer a vegetarian option and/or ensure all meat is halal, in order to meet the needs of their whole school community.</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>The requirement from school food standards to ensure that a portion of non-dairy protein is provided on three or more days each week should enable the needs of vegans to be met on most days, and enable them to benefit from the financial benefits of UFSM.</p> <p>The year one IoUH evaluation found that many schools recognised the possibility of children with faith-based diets missing out on both FSM and UFSM; these schools already had food provision</p>	<p>Monitoring of uptake of UFSM 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> <p>Ensure that the</p>
--	--	--	--	---

	<p>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, particularly LB Barnet and LB Brent. Sikh schools are concentrated in the west of London, in LB Ealing and LB Hillingdon.⁶⁶</p> <p>Different religious/faith groups have specific dietary requirements (see section 3.5.4 for further details).</p> <p>For the 2023-24 academic year, there were 70 registered independent faith-based schools in London. These schools had 10,817 pupils aged 7-11. The most common type of independent school with a religious denomination was Church of England (17); a further 13 schools declared that they were of another Christian faith. Eleven schools were Jewish, or said they belonged to a distinct</p>	<p>dataset exists on the cost of meals that cater to those with religious requirements, although some consultation with boroughs has taken place to mitigate this gap. Ongoing consultation and engagement will seek to verify assumptions around price point.</p>	<p>that met a range of requirements. However, they also found evidence that some pupils with faith-based dietary needs were often facing more limited meal options than other children under UFSM, particularly in schools where they were in the minority. This sometimes prevented these children from taking up and enjoying the offer every day. Evaluators found issues largely predate the policy and are not new problems since the introduction of UFSM. The evaluation highlights the importance of a whole system approach to ensure a UFSM policy is delivered effectively.</p> <p>Key findings include:</p> <ul style="list-style-type: none"> • Almost all London schools (95 per cent) surveyed offered halal food in 2022-23, rising slightly (to 97 per cent) in 2023-24. Some offer halal and non-halal meat options. Others offer vegetarian or pescatarian meals as default halal options. Where there are no specific halal options, pupils choose vegetarian meals. However, our research shows some families found these to be restrictive and repetitive. • Sikhs typically don't eat meat that is prepared according to halal or kosher methods. Many schools in London predominantly offer Halal meats, meaning Sikh children are not always catered for. Some Hindus also refrain from eating certain foods on certain days. This can be challenging when there are not many options on offer. We found that a small number of Sikh and Hindu families opt out on these 	<p>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> <p>The UFSM scheme is just one measure within a range of steps the Mayor is taking to help Londoners deal with the cost-</p>
--	---	--	---	--

⁶⁶ DfE, 2023. Get Information about Schools. Available online at: <https://get-information-schools.service.gov.uk/>

	<p>branch of the Jewish faith. These had 2,114 pupils; or 4 per cent of the total population of independent-school pupils aged 7-11. Eleven schools classified themselves as Muslim. These had 451 pupils, or 1 per cent of the total population of independent-school pupils aged 7-11.</p> <p>School food standards⁶⁷ state that 'for vegetarians, a portion of non- dairy protein on three or more days each week' should be provided.</p> <p>A 2020 landmark legal case ruled that ethical veganism is a philosophical belief under the Equality Act.</p>		<p>days, or for these reasons.</p> <ul style="list-style-type: none"> • The evaluation teams had planned to carry out qualitative research in Jewish faith schools. However, this was not possible, as the research took place while Jewish schools were taking extra precautions to protect staff and pupils. The team was advised by LAs that it would be challenging for Jewish schools to host external researchers. Further research is needed to understand the experience of Jewish pupils, and the barriers to taking up meals, to make sure all children have equitable access to school food. • GLA Arbor data and the GLA's parent survey suggest these challenges didn't significantly affect overall take-up. <p>Further considerations</p> <p>School meal provision across mixed-faith schools may not necessarily meet all dietary requirements of pupils from faith groups, such as the requirement for kosher meals for Jewish children, halal meals for Muslim children, and the needs of Hindu children. This may be more of an issue in schools with fewer children from minority faith groups, where the default may not be to cater for their specific dietary needs. This may affect uptake of UFSM by children from these faiths who may continue to bring packed lunches to meet their dietary requirements, and therefore would not feel the financial benefits of UFSM. Information on this has been captured through programme monitoring</p>	<p>of-living crisis. Many of these are eligible to all families in London (including those who do not attend a state-funded school).</p>
--	--	--	--	--

⁶⁷ DfE (2023) Guidance – School Food Standards Practical Guide [Accessed 12/06/23] School food standards practical guide – GOV.UK (www.gov.uk).

			<p>and evaluation activities, correspondence with parents, and updates provided at regular borough meetings.</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 uptake of UFSM by children who follow a vegan diet, who may continue to bring packed lunches to meet their dietary requirements, and therefore would not feel the financial benefits of UFSM.</p> <p>As set out in the GLA Supplementary Paper the Mayor has considered representations received and whether the UFSM policy should be extended to include the provision of FSM to some independent schools, such as those serving the Charedi and Muslim communities. It is acknowledged that, according to the information provided on behalf of the Charedi community, some of the families of children in these independent faith schools are unable to pay school fees; live in larger-than-average families; and receive housing benefits and tax credits.</p>	
--	--	--	--	--

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>In London, 13 per cent of households are lone-parent households. This is slightly higher than the national average (see section 3.6.1).</p> <p>Single adults with children have the highest poverty rate among adults, with 47 per cent living in poverty in London, and 44 per cent in the rest of England in 2022-23.⁶⁸ 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).⁶⁹</p>	<p>Data is not currently available on uptake of FSM by lone-parent households.</p>	<p>UFSM is likely to bring financial and health benefits to children from lone-parent, and thus lone-income, households, which are statistically more likely to be headed by women.</p>	

⁶⁸ Trust for London, [Poverty and family structure: Proportion of households in poverty by family type \(2022/23\)](#)

⁶⁹ ONS, [Families and households in the UK: 2023](#), 8 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.⁷⁰ This gap equates to approximately £6,700 per year before tax. These findings demonstrate that the wage gap between heterosexual and LGBTQ+ professionals is nearly twice that of the UK's gender pay gap between men and women.</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	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 UFSM.	

⁷⁰ Sphere, [Heterosexual and LGBTQ+ pay gap higher than UKs gender pay gap](#), 25 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. It is therefore outside the scope of this assessment.	
Socio-economic status <i>I.e., consideration of those on low incomes, and those living in deprived areas.</i>	<p>In 2022-23, 16 per cent of children in London were reported as living in low-income households (see section 3.6.4). 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, Newham, Barking and Dagenham, and Hackney (27 per cent, 23 per cent, 23 per cent and 22 per cent respectively).⁷¹</p> <p>Between 2020-21 and 2022-23, around 2.2m Londoners (24 per</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 ethnicities are more likely to be eligible for FSM. This indicates that those from ethnic minority groups are also more likely to fall within low-income families.</p> <p>Research by CPAG⁶⁴ has shown that hundreds of thousands of school children 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 families living in</p>	

⁷¹ LG Inform, [Proportion of children aged 0-15 in relative low income families in England](#), 30 November 2024

	<p>cent) were in relative poverty, after taking housing costs into account.⁷² The poverty rate was 27 per cent in Inner London, and 23 per cent across Outer London. This is the lowest London poverty rate in 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. The poverty rate in London is also highest for children compared to other age groups at 32 per cent (see section 3.6.5).</p> <p>In April 2023, 13.3 per cent of London employee jobs were paid below the LLW (see section 3.6.6).</p> <p>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 (Connolly, 2022;⁷³ O'Connell and Brannen, 2022).⁷⁴</p>		<p>low-income households, who cannot afford to pay for school lunches but do not meet the FSM eligibility criteria, would have access to school meals with potentially higher nutritional value than the 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 make accessing FSM difficult, even for those who qualify for FSM. This is because they may be unable to navigate the system, or fill in the relevant forms.</p> <p>The receipt of FSM may have benefits for improving attendance This is through reduced health-related absence, and access to a free lunch as a motivating factor.. The data shows a correlation between levels of income deprivation within an LA area and school attendance (see section 3.7.2).</p> <p>IoUH's evaluation found that families living on low incomes are benefiting the most from the additional financial support, with parents in receipt of Universal Credit more likely to say the policy was 'significantly helping' household finances (52 per cent, compared to 31 per cent not receiving Universal Credit). They found that the policy has successfully reduced a significant cost facing families living on low incomes – including by increasing take-up among those previously entitled to, but not registered for, means-tested FSM.</p> <p>IoUH's evaluation found that universal approaches</p>	
--	--	--	---	--

⁷² Percentage of people of working age in households with income below 60 per cent of national median.

⁷³ 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.

⁷⁴ 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>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;⁷⁵ O'Connell and Brannen, 2022).⁷⁶</p> <p>The programme systematic review⁷⁷ 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 (Stevens et al., 2013,⁷⁸ Evans et al., 2016;⁷⁹ Evans et al., 2020⁸⁰), particularly for children in low-income households</p>		<p>to school food can help to address negative consequences for pupils. Its research shows the policy is helping to break down and address some of the poverty-related stress and feelings associated with stigma families are facing. Some parents spoke passionately about the need to remove means testing from the school day. They felt this had a detrimental effect on children, and that school should act as a leveller, not a place to expose differences. Some parents had experienced poverty-related stigma themselves as children, and felt that universal provision was the best way to avoid this in their child's school.</p> <p>Further considerations</p> <p>Concerns that UFSM will reduce the numbers eligible for FSM signing up for FSM – which may impact on PP,⁸² with potential repercussions for school's financial resources. This is likely to have a disproportionately greater impact in more deprived areas where there may be a shortage of other funding streams, such as fundraising through 'friends of' schemes. Grant conditions for schools have tried to address this by stating: 'To mitigate</p>	<p>Include, in the Year 2 grant conditions, a request for boroughs to adopt auto-enrolment.</p> <p>Continue to closely monitor uptake of national funding and</p>
--	---	--	--	---

⁷⁵ Sahota, P., Woodward, J., Molinari, R., and Pike, J. (2014) Factors influencing take-up of free school meals in primary and secondary school children in England. Public Health Nutrition. 17(6)1271-9.

⁷⁶ O'Connell, R. and Brannen, J. (2021) Families and Food in Hard Times: European comparative research. London: UCL Press. DOI:10.14324/111.9781787356559.

⁷⁷ Cohen, J. and McLoughlin, G. (2023) An Updated Systematic Review of the Literature Examining Universal Free School Meals in the United Kingdom and Internationally. Available online (see Appendix 1): GLA, [Integrated Impact Assessment Universal Free School Meals](#), July 2023

⁷⁸ 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.

⁷⁹ 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.

⁸⁰ 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.

	(Stevens and Nelson, 2011). ⁸¹		<p>against this, we would encourage consideration of best practice in promoting registration (and the benefits to schools) including models where all parents are required to complete registration.'</p> <p>Furthermore, in March 2025 TP will end. Currently, pupils with eligibility on or since 1 April 2018 will receive FSM until March 2025 or until their phase of education is over, whichever is later. This is the case even if their household is no longer eligible under the benefits/low-earnings criteria. However, those 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. Once TP ends, the implication is that many families will need to reapply for PP, when they otherwise would have not done so. Failure to do so could impact school budgets.</p> <p>IoUH's evaluation showed that, when UFSM was announced, some schools and LAs raised concerns that the policy would remove the incentive for families to register their children for means-tested FSM. A reduction in registration would have a knock-on effect on PP funding. In IoUH's survey with schools, half said that UPFSM has reduced the numbers registering for means-tested FSM. 31 per cent indicated there had been no change, and 19 per cent said they did not know.</p>	PP.
--	---	--	--	-----

⁸² The PP 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.

⁸¹ 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

			<p>The stigmatisation of poverty in society can result in feelings of shame, and is associated with social isolation and reduced take-up of benefits. Existing research shows that being eligible for means-tested FSM can cause feelings of embarrassment for children at school, and for their families. This is supported by the GLA Arbor data, which shows that take-up has increased among those who were previously eligible for means-tested FSM, rising from 88 per cent in 2022-23 to 94 per cent in 2023-24.</p>	
--	--	--	---	--

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.⁸³</p> <p>The Joseph Rowntree Foundation's 2024 Poverty Report³⁹ estimated 28 per cent of carers in the UK were living in relative poverty in 2021-22.⁸⁴</p> <p>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>		Those with caring responsibilities may disproportionately benefit from the financial relief provided by UFSM.	

⁸³ DWP, 2024, [Family Resources Survey: financial year 2022 to 2023](#), Care Data tables, Table 5.4.

⁸⁴ Joseph Rowntree Foundation, [UK Poverty 2024: the essential guide to understanding poverty in the UK](#), 23 January 2024

7. Ongoing work

The EqIA 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 EqIA 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 EqIA, as and when they become available.

Supplementary analysis on London school sector

1. Purpose

- The Greater London Authority (GLA) City Intelligence Unit (CIU) 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 and non-maintained special schools (NMSS)), using publicly available data and insights from delivery of the London UFSM scheme to date.
- 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 has been updated in June and December 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 and December 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, funded by the government under the national scheme (FSM).
- 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 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 the universal infant free school meals (UIFSM) (covering state schools). Further explanation for the scope of coverage is set out in this paper.
- The sum referred to above represents a limited pot of money which 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 assesses the equality impact of UFSM, to ensure that:
 - all considerations could be made in the policy development
 - 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 (2014 Regulations).
- 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 / non-state sector, 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 subcategories of independent schools, including independent special schools and independent faith schools.
- There are three NMSS across Hammersmith and Fulham, Haringey and Hillingdon. In 2023-24 they had a total of 47 pupils in KS2, 16 who were known to be eligible for FSM.²⁰ NMSS are covered by Government funded FSM because they have an identical duty to provide free school meals to eligible pupils under the Non-Maintained Special Schools (England) Regulations 2015. The Government's school food standards also cover NMSS. NMSS will also therefore be included within the Mayor of London's offer for UFSM to pupils who are not eligible for national government funded meals – this is because this will ensure that the Mayor of London UFSM policy is in line with national government standards.
- 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 some of the Charedi community. These sought expansion of the Mayor's UFSM programme to such children attending independent faith schools in Hackney. The representations raised by the Charedi community included 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, 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.
- Representatives from the Charedi community who were interviewed as part of Year 1 EqIA development said that 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.
- One proposal suggested by representatives of the Charedi community was 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 independent evaluation of the UFSM scheme by Impact on Urban Health¹ found that 'while our research didn't extend to independent faith schools, we recognise some Jewish children have been unable to experience the benefits of the policy, despite being in families that are facing some of the greatest levels of hardship'.
- In August 2024, through the provision of a contact email for the programme on the GLA website representation was also received from a parent, writing on behalf of a collective of nine Islamic Faith independent schools in Tower Hamlets. The representation commended the Mayor's initiative but petitioned for its expansion to children in independent schools across London. The reasoning presented for this was that in their view:
 - families choosing independent education often make significant sacrifices, prioritising their children's education above personal comforts, not

¹ Impact on Urban Health, 2024. More Than a Meal An independent evaluation of universal primary free school meals for children in London. Available at: <https://urbanhealth.org.uk/wp-content/uploads/2024/11/loUH-Free-School-Meals-Report.pdf>

because they are very rich or privileged – this is however not representative of the whole of the independent sector

- all children, regardless of their educational setting, should benefit from essential support
- that it would be feasible to implement such a rollout effectively.
- The Mayor has considered representations received and whether the UFSM policy should be extended to include the provision of FSM to some independent schools, such as those serving the Charedi and Muslim communities. It is acknowledged that, according to the information provided on behalf of the Charedi community, that some of the families of children at these independent faith schools come from families that: are unable to pay school fees, are larger than average; and receive housing benefits and tax credits.
- Information about fees charged by independent schools and the number of children who would otherwise be 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.

- In 2023-24, there were 450 independent schools in London which had pupils in the 7-11 age range. These schools had, in total, 51,264 pupils.
- Most of these independent schools (84 per cent) classified themselves as having no religious character. 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.²
- For the 2023-24 academic year, there were 70 registered independent faith-based schools in London. These schools had 10,817 primary-school pupils aged 7-11. The most common type of independent school with a religious denomination was Church of England (17), with a further 13 schools declaring that they were another Christian faith.
- Eleven schools were Jewish or said they were of another Jewish faith. These contained 2,114 pupils or 4 per cent of the total population of pupils in independent schools in the 7-11 age range.

² [Schools, pupils and their characteristics, Academic year 2023/24 – Explore education statistics – GOV.UK \(explore-education-statistics.service.gov.uk\)](https://explore-education-statistics.service.gov.uk)

- A further eleven schools classified themselves as Islam or Muslim. These contained 451 pupils or 1 per cent of the total population of pupils in independent schools in the 7-11 age range.
- 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 give an indication of the fees for schools, although some of these reports are several years old.
- 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 costs 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.
- The majority of children attending such fee-paying schools are provided with a school meal and this is included within the fees that are paid for children to attend these independent schools.
- 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.
- The majority of independent schools, including high fee-paying independent schools, independent faith schools and others, like independent Charedi community schools, offer bursaries or scholarships against fees for pupils from lower socio-economic backgrounds. In all instances, these bursaries can cover the total cost of a pupil from a lower socio-economic background's admission fee.
- In 2022, the government stated that 50 per cent of independent schools had charitable status. In 2024 the ISC found that 69 per cent of their independent schools had charitable status. There is no readily available data to break this

down to regional level. Moreover, of those circa 50 schools in the UK that are known to be strictly Jewish Orthodox, there are about 40 independent schools with a Jewish faith designation, although inspection evidence suggests that around 60 UK 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.

- There is no central register specifying whether an independent schools is a limited company or charity; or what fees it charges. 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. 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 – this level of resource requirement would be impractical and unreasonable.
- Poverty is higher amongst pupils attending state-funded schools, compared to children in the independent sector. For the overwhelming majority of private school pupils, their parents are in the top 10 per cent income group.³
- 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 of the cost-of-living crisis 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.
- Pupils with special educational needs and disabilities (SEND) can be educated in mainstream or special schools in England. The special school sector includes state-funded, non-maintained (NMSS), alternative and independent schools. Most pupils with SEND attend mainstream settings. Of those in state-funded special schools, most have an Education, Health and Care Plan (EHCP).
- The number of children with SEND attending independent schools is on the rise and a recent report by the National Audit Office (NAO) found that state special schools are over capacity.⁴ In 2023-24 there were 70 independent special schools in London (covering all age ranges).⁵

³ Civitas, Private schooling in Britain: a snapshot, February 2023.

(<https://www.civitas.org.uk/2023/02/24/private-schooling-in-britain-a-snapshot/>)

⁴ National Audit Office, [Support for children and young people with special educational needs](#), October 2024.

⁵ Schools, pupils and their characteristics, Academic year 2023/24 – Explore education statistics – GOV.UK (explore-education-statistics.service.gov.uk).

- The main reason why an increasing number of pupils may attend NMSS is because local authorities have an increasing number of pupils on a EHCP and numbers are greater than the places available in state schools. However, some pupils may have complex needs that need specialist support which is not available in state schools.
- London Councils has published research which shows that use of independent school provision for young people with an EHCP is up 31 per cent in London in the last five years.⁶ The NAO report estimated that a place at an independent school costs £61,500, compared to £23,900 in a state special school. This is placing a significant financial burden on local authorities.
- GLA officers meet with every borough on a termly basis. As part of the meetings non state funded schools are discussed and to date no issues about representation from the independent special school sector have been made.. In 2024-25 GLA officers were made aware of a parent enquiring about inclusion of NMSS within the policy. This has been subject to an in-depth review by the UFSM Policy team which is set out in this document.
- Consideration is being given to extending the UFSM policy to pupils with SEND maintained special schools (NMSS) from the 2025-26 academic year. Under s.337A of the Education Act, NMSS are schools for children with special educational needs that the DfE has approved under s.342 of the Education Act 1996. NMSS are independent of local authority control and operate on a not-for-profit basis. They are funded by the Education and Skills Funding Agency (ESFA) in the same way as academies.
- In 2023-24 there were three NMSS in London, across three boroughs.
- NMSS are covered by Government funded FSM because they have an identical duty to provide free school meals to eligible pupils under the Non-Maintained Special Schools (England) Regulations 2015. The Government's school food standards also cover NMSS. Therefore, this academic year the GLA will be including eligible pupils attending NMSS within UFSM grant to boroughs. Further detail on including NMSS in the scope of the Mayor's UFSM policy is included in MD3332.
- Under s.337A of the Education Act, NMSS are schools for children with special educational needs that DfE has approved under s.342 of that Act. According to the gov.uk website, NMSS are independent of local authority control and operate on a not-for-profit basis. They are funded by the Education and Skills Funding Agency (ESFA) in the same way as academies. By including NMSS in the London UFSM policy (in line with the national government policy) this will ensure equality impacts for pupils attending NMSS are mitigated.

⁶ Mime and London Councils, [Inclusion in London's Schools](#), November 2024.

Issues with extending UFSM scheme to independent schools

- The UFSM scheme is intentionally set up in line with national government policy which only funds the state-sector and NMSS. If the scheme were extended beyond this scope, it would give rise to considerable complexity in the operation of the scheme. This would also add additional and 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 or 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 to meet 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 non-state funded independent schools, so a wholly different, more time consuming and costly method for implementation would need to be devised.
 - There is no readily available administrative structure available for boroughs to use to implement a scheme in the non-state-funded independent sector, that would easily enable expansion of the scheme to ensure that only families in poverty or who are suffering financial hardship could benefit. This would be complex and would take time to set up. As a result, including such schools would significantly delay the policy. This was 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.
 - 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 area. In 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 that 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 assessed (in consultation with the boroughs and London Councils) that asking boroughs to further extend beyond state schools would add a significant extra burden on to them (and in some cases, would place significant risk to delivery of the whole scheme.) Following discussions with London boroughs, London Councils and other partners for year two this situation remained 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

- 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. Many of these are eligible to all families in London (including those who do not attend a state funded school).
- **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 the Mayor invested £3.9m to deliver over 10 million meals during school holidays and at weekends through partners the Felix Project and Mayor's Fund for London. Going forward there is an ongoing commitment to deliver food support to young people as part of a Holiday Hope programme, which will look at providing positive opportunities for young people during the holidays. The Mayor has also £498,000 invested into a **London pilot of Multibank** which supplies in-kind donations of essential goods to organizations that work with Londoners struggling with the cost of Living. This includes support to establish a partnership with baby bank network, Little Village, to enhance provision of essential items that families in London are increasingly struggling to afford. Additionally, the funding is enabling Little Village to open some of its hubs on evenings and weekends so that Little Village can reach more working families, outside of normal working hours, with essential items and with wraparound support for their financial situations.
- Through these projects, 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** aimed 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.
- Following a round of Food Roots crisis grants designed to support boroughs' capacity for crucial partnership work in 2022-23 during the cost-of-living crisis, a new iteration of the Food Roots programme launched – with £1.24m for the first 12 months of delivery, and an additional £740,000 to support an extension to summer 2025. The programme supports partnerships in 22 London boroughs via grant funding for staff capacity and a learning support programme, to work in partnership to increase their resilience and sustainability and 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, starting with food as the foundation. Kitchen Social is one of their programmes, ensuring under-resourced young Londoners can access healthy, nutritious meals, fun, and skills building opportunities during all thirteen weeks of the school holidays. Kitchen Social continues to focus on addressing the growing and serious issue of children and young people facing food insecurity and social isolation outside of term time as well as evenings and weekends. Currently, 100 hubs are supported across 30 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 600 community organisations in 32 London boroughs, supporting over 150,000 children and young people by providing over 1.5 million nutritious meals in partnership with the Mayor. This support includes funding and opportunities during school holiday time for communities who have protected characteristics such as faith/religious groups and those with no recourse to public funds. Currently three Kitchen Social Hubs provide support to young people from the Charedi and wider Jewish community. 22 seasonal recipes from their food recipe kits have been developed including dedicated Kosher meal kits and ingredients, and these are distributed across London during each school holiday.
- Hackney borough council also run [summer holiday provision sites](#) at several Orthodox Jewish community centres which 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 FSMs, 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.
- 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 continuing to 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.⁷
- Comprehensive data on the financial standing of the independent school sector is limited.
- 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.

⁷ [Types of school: Private schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/types-of-school)

- 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 landscape.⁸ It is based on a survey carried out by all 1,411 UK schools in belonging to the constituent associations of the ISC.
- The Charity Commission's website contains financial information on independent schools [that are charities]. 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.
- This information and assessment of the independent sector will continue to be monitored by the GLA throughout year two of the scheme.

⁸ [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 free school meals to pupils in state-funded primary schools (including state funded, schools for those with special educational needs and disabilities (SEND) and alternative provision (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. He has since confirmed that he will make the scheme permanent for as long as he is the Mayor of London.
- 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 and from September 2025, NMSS.
- 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

- Analysis by the Office for National Statistics 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.⁹

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 Charities Act 2011 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.

⁹ [Impact on Urban Health, Investing in Children's Future: A Cost Benefit Analysis of Free School Meal Provision Expansion, October 2022](#)

- 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.
- 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.¹⁰ 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 schools themselves.
- 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 statistical bulletin for 2018-19 to 2020-21 found that in 2020-21 there were 12,284 Jewish pupils in mainstream Jewish schools in London; and 13,960 Jewish pupils in strictly Orthodox Jewish schools.¹¹

Muslim children in Islamic schools

- Of the few Islamic schools in London, the data collected and published by the DfE does not distinguish different types.

¹⁰ [ISC Census and Annual Report 2024](#)

¹¹ [JPR, 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, data on the independent/ private school sector is limited.

1. 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 further breakdown to determine whether they are mainstream private, private faith, or neither (such as the Charedi community). The data on 'religious character' of the school is limited. The DfE's breakdown extends only to 'Jewish' and 'other Jewish faith'; no further breakdown is available.

2. 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 private schools are inspected in the London data. A count of 212 schools show that they have been 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.
 - b. Ofsted data does not give any further breakdown (including details of fees).
3. **ISC:** The ISC ([Private schools \(independent schools\) in London - ISC](#)) has a directory of independent schools in London by borough and provides their pupil numbers, denomination, and fees/term. However:
- not every independent school is a member of ISC (this may be as much as 50 per cent).
 - there is no readily accessible data to allow further analysis.
4. **Independent school search service:** [Independent schools in Greater London \(schoolsearch.co.uk\)](#) is an online directory showing an age breakdown.

This data set is not complete and does not have any accessible data to interrogate.

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).¹²
- The DfE data breaks down independent schools in London only by certain protected characteristics, notably the age of their pupils and the school's religious character (see **Figure 1 in Annex 2**).

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; this 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 case 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 the most common type of setting (28 per cent). Around a quarter of the settings (26 per cent) are general education providers, and a fifth (21 per cent) are places of religious instruction.¹³

¹² [Schools, pupils and their characteristics, Academic year 2023/24 – Explore education statistics – GOV.UK \(explore-education-statistics.service.gov.uk\)](https://explore-education-statistics.service.gov.uk)

¹³ [Unregistered schools management information - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Annex 2, Figure 1: Pupils aged 7-11 attending independent schools by religious denomination of the school, 2023-24

This 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.

Local Authority	Anglican	Church of England	Free Church	Islam	Jewish	Methodist	Muslim	No religious character	Other Christian Faith	Other Jewish Faith	Roman Catholic	Total
Barking and Dagenham								58				58
Barnet				66	44			2168		213		2491
Bexley		157						191				348
Brent				19				713				732
Bromley			358			180		925	173		85	1721
Camden		358						2812			407	3577
City of London		154						382				536
Croydon		69						1757			82	1908
Ealing								1193			323	1516
Enfield								541			49	590
Greenwich								1210				1210
Hackney				24	351			2510		1506		4391
Hammersmith and Fulham		117		47				2029				2193
Haringey								532	661			1193
Harrow		147						1049				1196
Havering								157	91			248
Hillingdon				20				1554				1574
Hounslow								703				703
Islington								261				261
Kensington and Chelsea		153						3762			73	3988
Kingston upon Thames								970	499			1469
Lambeth								795				795
Lewisham		364						349				713
Merton		427						985			239	1651
Newham							67	316	19			402
Redbridge		132					53	1123			49	1357
Richmond upon Thames		698						2692	170		127	3687
Southwark								1497	62			1559
Sutton								672				672
Tower Hamlets								844				844
Waltham Forest		370		103			28	98				599
Wandsworth				24				3376	711			4111
Westminster	24	479						2223			245	2971
Total	24	3625	358	303	395	180	148	40447	2386	1719	1679	51264

Source: Schools, pupils and their characteristics, School characteristics 2023-24, [Department for Education](#)

Annex 2, Figure 2: Independent schools with pupils aged 7-11 religious denomination of the school, 2023-24

This table shows the number schools which have pupils in the 7-11 age range in each borough during the 2023-24 academic year. It is further broken down by what religious denomination that independent school is listed as.

Local Authority	Anglican	Church of England	Free Church	Islam	Jewish	Methodist	Muslim	No religious character	Other Christian Faith	Other Jewish Faith	Roman Catholic	Total
Barking and Dagenham								5				5
Barnet				1	1			27		2		31
Bexley		1						4				5
Brent				2				11				13
Bromley			1			1		10	1		1	14
Camden		2						22			3	27
City of London		1						3				4
Croydon		1						19			1	21
Ealing								17			1	18
Enfield								9			1	10
Greenwich								10				10
Hackney				1	1			21		7		30
Hammersmith and Fulham		1		1				16				18
Haringey								6	2			8
Harrow		1						8				9
Havering								4	1			5
Hillingdon				1				7				8
Hounslow								13				13
Islington								6				6
Kensington and Chelsea		1						24			2	27
Kingston upon Thames								11	1			12
Lambeth								7				7
Lewisham		1						4				5
Merton		1						11			2	14
Newham							1	4	1			6
Redbridge		1					1	9			1	12
Richmond upon Thames		2						18	1		1	22
Southwark								6	1			7
Sutton								6				6
Tower Hamlets								13				13
Waltham Forest		1		1			1	1				4
Wandsworth				1				24	5			30
Westminster	1	3						24			2	30
Total	1	17	1	8	2	1	3	380	13	9	15	450

Source: Schools, pupils and their characteristics, School characteristics 2023-24, [Department for Education](#)

Annex 3: Independent School Sector in England – technical detail

Background

1. An ‘independent school’ is defined by the DfE as a school that is either: not maintained by a local authority or is not a non-maintained special school, and at which full-time education is provided (a) for five or more pupils of compulsory school age or (b) for 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 has a statement of special educational needs or an education, health and care plan.

Regulatory framework

2. The DfE through the Secretary of State acts as the regulator for the 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.
3. 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.
4. 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

5. 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.
6. In 2019, Ofsted estimated that as many as 6,000 children in London are being educated in unregistered school settings.¹⁴
7. Almost a quarter of the unregistered schools Ofsted inspected (23 per cent) were in London, with the rest evenly spread across the country. A fifth (21 per cent) were faith schools, including 36 Islamic schools, 18 Jewish schools and 12 Christian schools.
8. 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

¹⁴ [Ofsted, Unregistered school management information, 8 May 2024](#)

unregistered 'yeshivas'. About 1,000 boys aged 13-16 in Hackney alone are thought to be 'missing' in this sense.¹⁵

¹⁵https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221858/jewish_20independent_20schools.doc