

# GREATER LONDON AUTHORITY

## REQUEST FOR MAYORAL DECISION – MD3509

### Universal Free School Meals Provision 2026-27

#### Programme: Supporting and inspiring young London

#### Executive summary:

In June 2025, Mayoral Decision (MD) 3380 approved the delivery plan for the strategic programme Supporting and Inspiring Young London, which committed to continue the Universal Free School Meals (UFSM) scheme. An MD is required to approve the UFSM budget for financial years 2026-27 and 2027-28.

Up to £99.4 million was included in the final GLA: Mayor budget, as approved by the Mayor on 18 March 2026. This MD therefore seeks to outline the budget breakdown, to continue funding a grant scheme open to all local authorities in London, and so provide UFSM in state-funded primary schools for the academic year starting in September 2026.

The funding will continue to address cost-of-living pressures and support the Mayor's ambition to make London the best city in the world to grow up in. It will cover the cost of meals, within term time, for the academic year running from September 2026 to July 2027. Over the year, funding free school meals is expected to save families approximately £500 per child.

The Mayor is asked to approve spending up to £99.4 million for the 2026-27 academic year, to fund eligible local authorities to continue delivering the UFSM scheme to Key Stage 2 children in London's state funded primary schools in the 2026-27 academic year. (This includes all-through schools; academies; state-funded special schools; alternative provision; and non-maintained special schools.)

#### Decision:

The Mayor approves the following:

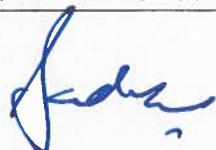
- Expenditure up to £99.4 million (spanning two financial years, but one academic year) to continue providing grants to eligible local authorities, so they can in turn provide grants to local state-funded primary schools, and non-maintained special schools, to deliver universal free school meals to Key Stage 2 children, in the 2026-27 academic year. The amount granted to each borough will depend on how many of its primary-school children are eligible for government-funded free school meals. This includes £95.3 million core allocations, plus up to £4.1 million funding for: kosher meals; additional funding where exceptional costs arise for children attending special schools; additional funding for higher uptake; and scheme costs.
- The final funding allocations to London local authorities, and the payment model outlined in paragraphs 2.5 and 2.7, below – after taking into account the Equality Impact Assessment (see Appendix A).
- Delegation of authority to the Executive Director of Communities and Skills to make programme-level decisions via a Director Decision form, in respect of the additional top-up funding referred to in paragraphs 1.8, 3.4 and 5.2.

#### Mayor of London

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Date:

9/7/26

## PART I – NON-CONFIDENTIAL FACTS AND ADVICE

### Decision required – supporting report

#### 1. Introduction and background

- 1.1. The Mayor believes that all primary school children in state-funded schools – including all-through schools, academies, state-funded special schools, alternative provision (AP), and non-maintained special schools (NMSS) – should have access to free school meals (FSM). The Mayor introduced the Universal Free School Meal (UFSM) scheme in September 2023 and has confirmed his intention to fund it until the end of his Mayoral term.
- 1.2. On 6 March 2025, via [Mayoral Decision \(MD\) 3332](#), the Mayor approved spending up to £147.5 million in funding to local authorities. This was so they could continue delivering UFSM to Key Stage (KS) 2 children in London state-funded primary schools for the 2025-26 academic year, with a view to continuing to help families financially.
- 1.3. In June 2025, MD3380 approved the delivery plan for the strategic programme, Supporting and Inspiring Young London (SIYL). This committed to continue the Mayor’s UFSM scheme across financial years 2025-26, 2026-27 and 2027-28. However, any spend relating to the 2026-27 financial year requires a MD to grant approval on budget breakdown.
- 1.4. The £99.4 million proposed for the Mayor’s UFSM scheme in the 2026-27 academic year spans the 2026-27 and 2027-28 financial years. This funding allocation was included in the final GLA: Mayor budget, approved by the Mayor on 18 March 2026. Approval of funding for the UFSM scheme in the 2027-28 GLA: Mayor budget is subject to the normal budget-setting process. This funding will cover two separate grants: the first will be awarded in August 2026; and the second in April 2027, after census data for January 2027 has been collected. This data will include figures on eligible pupils under the new Universal Credit criteria; and reflect the proportion of pupils who would have claimed for government funding. This second grant will include the final payment to fund pupils who would have not claimed government funding. This MD covers the first grant of £71,381,404; and up to £29 million for the second grant. Any additional funding required, beyond the £29 million (after receiving the January 2027 data) will need to be approved via the usual GLA budget-setting process.
- 1.5. All children in state-funded primary schools and NMSS who are in KS1 (Reception to Year 2) are entitled, under legislation, to the government’s Universal Infant Free School Meals (UIFSM) offer.
- 1.6. Until September 2026, under the government’s FSM scheme, children in KS2 (Years 3 to 6) at state-funded primary schools and NMSS are eligible for FSM only if they live in households that are both:
  - on Universal Credit
  - earning less than £7,400 a year (after tax and not including benefits).

This is the case regardless of the number of children in the family. From September 2026, however, the government will expand eligibility for the FSM scheme, to include children in all families on Universal Credit (i.e., removing the £7,400 income cap). All references to FSM eligibility and criteria in this document use the expanded FSM criteria applicable from September 2026, unless clearly stated.

- 1.7. The change does not affect delivery of the Mayor’s UFSM scheme. However, it means the government will fund a larger share of meals in London’s state primary schools.
- 1.8. The Mayor’s UFSM scheme will continue to fund meals for all non-government-funded eligible pupils, at £3 per meal, at 87 per cent take-up. The Mayor will also offer top-up funding for any schools with high uptake; special schools; and schools providing kosher meals.

Evidence supporting UFSM

- 1.9. Research indicates UFSM helps reduce stigma; and boosts take-up of the government's FSM offer among families who need it most, as highlighted in the previous MD3332<sup>1</sup>. More recent research, conducted in the last two years, identified several benefits of UFSM; these are detailed in paragraphs 1.10 to 1.12, below.
- 1.10. The Education Endowment Foundation (EEF) and Impact on Urban Health (IoUH) commissioned independent evaluations during the first two years of the Mayor's UFSM scheme. EEF commissioned University College London (UCL) to lead its Impact and Implementation evaluation. The final report (December 2025) shows that UFSM reduces stigma, and increases take-up across all pupil groups. This is particularly the case among disadvantaged families; pupils with special educational needs and disabilities (SEND); and even those with dietary needs.<sup>2</sup>
- 1.11. Independent evaluations commissioned by IoUH demonstrate clear financial benefits: around 78 per cent of families reported eased household budgets, and 84 per cent of parents across income groups said UFSM improved their finances (the largest gains were seen among low-income families). The EEF/UCL evaluation also found a link between reduced food costs and wider family wellbeing benefits, including lower parental stress; reduced mental load; and eased time pressures. This was especially the case for families who sat just above the government's FSM eligibility thresholds. This was reinforced in research from the National Education Union in 2024, which found that 61 per cent of parents experienced reduced time pressure.
- 1.12. The EEF/UCL evaluation report and IoUH evaluations found that universal provision normalises participation; and reduces feelings of difference. In this way it supports inclusion, self-esteem and emotional wellbeing for pupils. Evidence from UCL's Impact and Implementation evaluation, and the IoUH's evaluation, highlights how shared mealtimes enhance peer interaction, social mixing and a sense of belonging within the school community. Although short-term attainment impacts are not yet evident in the EEF/UCL year-one evaluation, both the EEF/UCL and IoUH evaluations identified improved readiness to learn, reduced anxiety, better concentration and higher energy levels – all linked to guaranteed access to a hot meal. The evaluations also pointed to smoother school routines; fewer issues related to dinner money debt; and more positive lunchtime behaviour. IoUH's year-one evaluation reported greater diet variety and children trying new foods; reduced stress around providing healthy lunches; and strengthened home-school relationships, underlining strong parental and school support for UFSM.
- 1.13. An [Integrated Impact Assessment](#) (IIA) was developed and published in 2023, when the Mayor's UFSM scheme was introduced. It was subsequently refreshed in July 2024, and again in July 2025. The IIA will continue to be refreshed to inform the policy. Similarly, an updated equality impact assessment (EqIA) and supplementary analysis on independent schools were published in March 2025 (see MD3332<sup>3</sup>). The GLA has updated the EqIA for the purposes of this decision, to ensure that any new considerations and recommendations are captured. These include potential equalities impacts, for London, from the government expanding FSM to families on Universal Credit. The updated EqIA for 2026-27 is at Appendix A; and the supplementary analysis is at Appendix D.

## 2. Objectives and expected outcomes

2.1. The objectives are to:

- support delivery of the Mayor's ambition to make London the best city in the world to grow up in
- help mitigate the impact of the cost-of-living pressures by saving London's families approximately £500 per child, per year of the scheme; and ensuring primary school children in

<sup>1</sup> GLA, [MD3332 Primary School Universal Free School Meals Provision 2025-2026](#), 7 March 2025

<sup>2</sup> EEF, [Universal Primary Free School Meals in London: Interim report](#), December 2025

<sup>3</sup> GLA, [MD3332 Primary School Universal Free School Meals Provision 2025-2026](#), 7 March 2025

state funded schools (including state-funded special schools, AP and NMSS) do not go without at least one nutritious meal a day during term time

- demonstrate the Mayor's role and commitment to address the impact of the cost of living on families, including other available sources of support
- reduce the stigma of receiving FSM in KS2; and increase the uptake of the government's FSM offer among families who need the FSM most.

2.2. The outputs, building on previous years, will include the following:

- Grants to all local authorities taking up the scheme, to fund UFSM to all KS2 children attending state-funded primary schools including state-funded special schools, AP and NMSS.
- Communications that promote the benefits of FSM universal registration approaches; and ensure that all eligible London pupils are registered, as the national FSM criteria changes. This includes highlighting the direct positive impacts for schools, families and disadvantaged pupils, particularly relating to pupil premium<sup>4</sup>; and continuing to support schools and local authorities to protect pupil premium grant income. This support should help local authorities and schools adapt their approaches in response to national government policy changes.
- Further independent evaluations undertaken by external partners, measuring the policy's impact on families.

2.3. Expected outcomes are as follows:

- London's KS2 primary-age children (Years 3 to 6) who are attending state-funded schools (including state-funded special schools, AP and NMSS), and are not entitled to the government's FSM scheme, will have access to at least one nutritious meal a day during term-time
- reduced stigma related to receipt of government FSM; and increased uptake of the government offer
- continued benefits identified through the scheme theory of change<sup>5</sup> and year-one independent evaluation, including:
  - reduced pressure on family finances, for households across the income spectrum
  - a positive effect on the health and wellbeing of children and their families
  - contributing to a calmer start to the school day for families across the income spectrum, ensuring children arrive at school more ready to learn
  - contributing to resolving the issue of dinner money debt for primary schools and parents who were previously struggling to cover the cost of primary school meals in London
  - improving energy levels and ability to concentrate due to having a school lunch, with this again supporting children's readiness to learn
  - acting as a leveller, supporting a sense of fairness and happiness at school.

2.4. Partnership working is vital for the UFSM scheme to continue in the 2026-27 academic year. To date, engagement with stakeholders has included close work with London Councils; London borough leaders and officers; academic partners; schools; caterers; unions; and other existing networks. Engagement activities with stakeholders will continue to include online bulletins; termly meetings and/or surveys; and knowledge sharing via borough network meetings and ad hoc meetings.

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<sup>4</sup> DfE, [Pupil premium: overview](#), updated 11 May 2026

<sup>5</sup> Bremner Consulting, [Greater London Authority Universal Primary Free School Meals Policy Theory of Change](#), June 2023

### Breakdown of deliverables and costs

- 2.5. The calculations for year four of the scheme are based on data from the Department for Education (DfE) and Department for Work and Pensions (DWP). It is estimated that up to £70.7 million of the UFSM budget will be allocated to local authorities in the first of two grant-funding agreements, to continue the scheme in the 2026-27 academic year. These funding allocations for UFSM are based on:
- the number of pupils in Years 2 to 5 (at London state-funded schools and NMSS) on school census day in January 2026
  - minus the number of children in Years 2 to 5 in households on Universal Credit, based on data from DWP in November 2025.

Due to the changeable nature of Universal Credit status, the second grant-funding agreement will be awarded in April 2027. This will reflect the January 2027 school census data (which will include pupils in families on Universal Credit), and will also reflect what the government funds.

- 2.6. The GLA will provide core funding to local authorities, equivalent to £3 per meal, and assuming 87 per cent take-up. This means the total expected number of pupils eligible for UFSM in each borough has been multiplied by £3.00 per day in the academic year (190 days), to finalise allocations with an assumed take-up of 87 per cent. Within this budget, up to £4.1 million is ringfenced funding for additional costs – including provision for:
- a higher price of providing kosher meals (funded at £3.85 per meal) for Jewish schools, in response to the findings of the EqIA at Appendix A
  - any exceptional costs arising for special schools to support the higher cost of meals for pupils with SEND, where needed
  - additional funding for uptake where school meal uptake is higher than the average 87 per cent.

### Funding mechanism

- 2.7. As with the first three years of the Mayor's UFSM scheme, funding will be allocated to the five London local authorities that already provided their own universal offer to their London primary state-funded schools prior to the Mayor's universal offer starting. This funding will be allocated as if these schools had not previously provided this function. The proposed allocation to these local authorities has been worked out in the same way as others. The intention is to encourage them to continue using the offset funds to support families in financial hardship.
- 2.8. Funding allocations for this year have been based on:
- DfE's school census (January 2026)
  - data on children in households on Universal Credit by year group (November 2025), obtained by a freedom of information request to the DWP.

As Universal Credit data fluctuates, an estimated total allocation was determined. This took the number of children in years 2-5, in households on Universal Credit; and deducted it from the total number of pupils in years 2 to 5, in the school census. The proposed funding mechanism is that local authorities will receive 80 per cent of this amount, upon receipt of a signed grant agreement in August 2026. The final amount will be calculated upon receipt of the January 2027 census. This census will include those eligible for FSM under the new criteria (and so includes those on Universal Credit); and will reflect the numbers of pupils that government funding will cover. A final amount will be made available in April 2027; this will reflect the latest data.

- 2.9. Local authorities will be funded based on an assumed take-up rate of 87 per cent. This considers take-up rates seen across London in years one, two and three of the scheme. Each borough can

secure additional funding, if it can evidence that uptake of the scheme has exceeded the assumed take-up rate at which it has been funded.

- 2.10. The GLA does not routinely collect data on the take-up of meals offered through the Mayor's UFSM scheme. It was felt that such data collection would be too great an added burden for schools; it is also in line with national government. Instead, the GLA has sought to understand levels of take-up through several sources. This includes:
- work with the management information systems provider Arbor
  - insights gathered through discussions with local authorities
  - observing where schools have claimed funding over the initial 87 per cent allocations.
- 2.11. The grant conditions stipulate that the funding must be spent on delivering and implementing the Mayor's UFSM scheme. In most cases, the local authorities will act as responsible bodies for the GLA's grant funding; and will provide on-grants to the eligible schools in their area.
- 2.12. Local authorities will still be required, through a grant condition for the 2026-27 academic year, to have an approach to universal registration in place, to identify pupils eligible for government-funded FSM who are not yet registered. This is to further protect pupil premium grant income for schools. As in previous years of the scheme, auto-enrolment is preferred – evidence shows this is an effective approach. However, where successful alternative approaches are in place locally, this will be taken into consideration. The GLA will continue to review the best approaches to registering eligible pupils and maximising pupil premium funding – including aligning with, or adapting to, future guidance from national government around eligibility-checking against the expanding national FSM criteria.
- 2.13. In previous years of the Mayor's UFSM scheme, local authorities were supported with additional funding; training; and expert advice to help them introduce universal registration approaches. Data collected by London local authorities has shown the positive impacts of these approaches in identifying additional pupils eligible for the government's FSM scheme; and unlocking pupil premium for schools. The GLA will continue to review where local authorities may need additional support to deliver universal registration approaches – particularly as the national FSM scheme criteria expansion will have knock-on impacts on eligibility checking.

#### Communications activities

- 2.14. Messaging to local authorities, schools, families and other stakeholders has been developed in partnership with internal and external colleagues. This is to communicate the Mayor's UFSM scheme; engage stakeholders; and keep families informed.
- 2.15. Shared learning from schools and local authorities that have developed ways to address various challenges will continue to be facilitated.
- 2.16. Practical communications resources, best practice guidance and branding guidelines will continue to be shared with schools and local authorities, via online dedicated hubs for each (see the [online hub for schools](#) and the [online hub for local authorities](#)).
- 2.17. Communications will be circulated to local authorities and schools to ensure they and families are informed and understand the importance of registration for the government's FSM scheme. Pan-London communications campaigns will continue to meet policy aims.

### **3. Equality comments**

- 3.1. Section 149(1) of the Equality Act 2010 provides that, in the exercise of their functions, public authorities – of which the Mayor is one – must comply with the Public Sector Equality Duty (PSED) which requires the Mayor to have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010
  - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
  - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 3.2. The EqIA (see Appendix A) for the scheme was initially produced in July 2023. It was refreshed in July 2024, March 2025 and May 2026. This was to ensure the EqIA incorporated the findings of the year-one independent evaluation, and the most recent data sources. The latest refresh of the EqIA takes into account the potential impacts of the government's forthcoming expansion of the FSM scheme, to families on Universal Credit.
- 3.3. The EqIA looks at the potential impacts on groups with protected characteristics; and then identifies the potential effects arising from those impacts. The EqIA aims to systematically identify and assess the potential impacts of the policy, both positive and negative, for people sharing one or more relevant protected characteristics as defined by the Equality Act 2010. It also aims to identify how any negative effects can be mitigated, or any positive effects enhanced. The relevant protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Socio-economic inequality of itself is not currently a protected characteristic under the Equality Act 2010. However, the assessment also considers the potential effects of the strategy for people based on socio-economic status.
- 3.4. The key equality findings can be summarised as follows:
- Strong overall positive impact: UFSM delivers significant benefits for children and families across London, particularly those experiencing financial hardship. It reduces food insecurity; supports children's health and wellbeing; and eases cost-of-living pressures for parents and carers.
  - Financial benefits for families: Independent evaluation shows the greatest financial gains for low-income households and those just above the government's (pre-2026) FSM scheme eligibility threshold, with reduced debt, lower financial stress and improved household food security.
  - Improved wellbeing and inclusion: Universal provision reduces stigma; supports a calmer start to the school day; and contributes to improved concentration, energy levels and enjoyment of school for many pupils.
  - High uptake across groups: Take-up of meals is high overall, including among pupils with SEND and dietary requirements – though uptake is slightly lower in older primary-school year groups.
  - SEND-related challenges remain: While UFSM benefits pupils with SEND, some face barriers due to complex dietary needs and higher delivery costs. Top-up funding for special schools mitigates this risk, but pressures remain, particularly in mainstream settings.
  - Cultural and faith-based needs: Some pupils from ethnic minority and faith communities experience limited choice, or provision that is not culturally appropriate, which can affect take-up. Ongoing improvements to menu diversity, and engagement with communities, are required; this remains an area of policy focus for the scheme.
  - Positive impact on lone-parent households: The policy particularly benefits lone-parent families (which are predominantly women-led) by reducing food costs and time pressures associated with preparing packed lunches.
  - No identified adverse impacts for sexual orientation: LGBTQ+ families are expected to benefit indirectly from the policy's financial and wellbeing impacts.

- Pupil premium safeguarded to date: Evidence shows no significant reduction in pupil premium since UFSM was introduced. Additionally, other work that local authorities are undertaking to implement universal registration approaches also impacts pupil premium level preventing further reductions. Thus results in more eligible families being registered for nationally funded FSM.

These issues will inform future updates to the EqIA and ongoing policy development.

3.5. The equalities impacts of the expanded FSM criteria are as follows:

- The government's expansion of national FSM criteria does not affect delivery of the Mayor's UFSM scheme for state-funded primary schools in London, but it has wider implications for funding and schools' delivery.
- In terms of equalities impacts, the government has published its own impact assessment as part of the Children's Wellbeing and Schools Act 2026. The refreshed EqIA for the Mayor's UFSM scheme also makes some reflections on the potential equalities implications for the scheme in 2026-27; however, a full assessment will not be possible until there is government data detailing the number of pupils meeting the expanded criteria, by protected characteristic. We can use available DWP data to estimate<sup>6</sup> that, from a total of around 371,000 current pupils in Years 2-5, approximately 52 per cent (193,000) are in households on Universal Credit, and will therefore meet the new national FSM eligibility criteria. This compares to the 30 per cent (110,000) of pupils in Years 2-5 who meet the previous FSM criteria. This means approximately 83,000 more pupils will qualify for government FSM, once the criteria changes.<sup>7</sup>
- Pupils who are eligible under the new criteria are from households on Universal Credit. This means these households are on a low income; out of work; or unable to work. As yet, there is no available data allowing analysis of protected characteristics of pupils meeting the expanded criteria. Nor do we know how many households in London are eligible for Universal Credit but are not claiming, and thus are not entitled to FSM. If this data becomes available, future EqIAs will include an analysis.
- These pupil estimates are based on the number of pupils who are currently in households on Universal Credit. However, their FSM status will only be confirmed if and when they successfully register for government FSM, in line with the criteria change. The Mayor will continue to ask local authorities to adopt universal registration approaches to register pupils, and help ensure newly eligible pupils are not missed. This, in turn, helps unlock additional funding streams for schools. Regardless of this, we do not anticipate primary schools will experience any overall reduction in funding for FSM, accounting for both government and Mayoral funding.

3.6. The EqIA annexed to [MD3146 \(July 2023\)](#) found certain costs associated with the specific access requirements for some groups of children in particular circumstances – such as those with SEND, and those with a dietary requirement connected to their religion or belief. This has been mitigated by providing a higher price per meal for Jewish schools; and funding for any exceptional needs arising in special schools.

3.7. The Mayor's UFSM scheme will continue to provide FSM in London's state-funded primary schools and NMSS only (this includes all-through schools, academies, state-funded special schools and AP). The supplementary analysis findings in relation to independent schools are annexed.

#### Independent schools

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<sup>6</sup> Estimates of the number of KS2 pupils meeting the expanded government FSM criteria have been calculated using data on:

- pupils in Years 2-5, in DfE school census data from January 2026 (early access)
- pupils in Years 2-5, in households receiving Universal Credit, in DWP data from November 2025 (obtained through a freedom of information request)

<sup>7</sup> Note that data in Year 2-5 is analysed at the current time (June 2026), because this cohort will move into Years 3-6 in September 2026, and is the cohort this funding relates to.

- 3.8. Before and since the introduction of the Mayor's UFSM scheme in 2023, representatives of sections of the Charedi community sought the scheme's expansion to children attending independent faith schools in Hackney. They contended that a disproportionate number of Charedi children attend independent schools, and are therefore disadvantaged by the decision to restrict the scheme to state schools.
- 3.9. Representatives of children from the Charedi community sought to bring judicial review proceedings against the Mayor's decision in MD3224 (which maintained the Mayor's UFSM scheme for the 2024-25 academic year, and included a decision not to extend eligibility to children at independent schools). The High Court refused permission for the judicial review claim to proceed<sup>8</sup> on the basis that the claim was not arguable. Since the Mayor's UFSM scheme began, the Mayor has also received written representations from independent Muslim faith schools, seeking extension of the scheme to their pupils. The supplementary analysis on independent schools has been updated to reflect available data relevant to such schools. Such arguments will likely also apply to other independent faith schools – e.g., for children who are Hindu or Sikh, and potentially for some branches of Christianity.
- 3.10. The Mayor has considered the potential adverse impacts of not extending his UFSM scheme to independent schools, as raised by the Charedi community, and as applicable to other communities in particular.
- 3.11. It may be the case that those with certain protected characteristics are more likely to attend non-state schools. There are likely to be families who wish to send their children to independent schools for important reasons – such as the need to ensure their education is delivered in ways that align with their religious values. Parents may also consider that children with certain disabilities need to attend independent special schools. Some children attending independent schools are not necessarily from wealthy families, as their places may be subsidised. It might be said that providing UFSM only to state schools will disproportionately disadvantage such groups.
- 3.12. The possibility of extending the Mayor's UFSM scheme to some or all independent schools has been considered. However, it has been decided not to expand the scheme in this way. This is considered justifiable, even if it may disproportionately disadvantage those with certain protected characteristics. Given the funding available is limited, and insufficient to provide meals for all primary-age pupils, this policy proposes to prioritise children from less affluent families. Whilst there is no bespoke mechanism for targeting such children, their attendance at state schools is considered a reasonable and practicable proxy for doing so. Non-state schools are more likely to charge fees or receive alternative income for pupils, which could be used to pay for meals. In any event, there is no objective means to assess whether a particular independent school has the resources to provide FSM to some, or all, of its pupils. As the Mayor's UFSM scheme is additional to the government's FSM scheme, it has been developed in line with the parameters set by the national policies for FSM and the government-funded UIFSM offer (which only covers state schools, including academies).
- 3.13. The rationale for limiting the Mayor's UFSM scheme to London's state-funded primary schools is summarised at paragraphs 3.14 to 3.19, below.

#### Replicating the statutory regime for FSM

- 3.14. As noted above, the UFSM scheme has been developed to replicate national government eligibility criteria for KS1. As such, the FSM policy will, effectively, remain extended to incorporate KS2 children. The Education Act 1996 (the 1996 Act) (as amended by the Children and Families Act 2014) provides that FSM shall be provided, on a universal and non-means-tested basis, to all KS1 children. The 1996 Act, as amended by the Children's Wellbeing and Schools Act 2026, does not require funding for all KS2 children at state-funded primary schools; and receipt is based on eligibility for Universal Credit. There is no provision in the 1996 Act requiring FSM for children at independent schools, regardless of

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<sup>8</sup> British and Irish Legal Information Institute, [GH, R \(on the application of\) v The Mayor of London \[2024\] EWHC 1305 \(Admin\)](#), 5 June 2024

the child's age or their parents' means. Likewise, by replicating the national government eligibility criteria, the Mayor's UFSM scheme does not extend eligibility to independent schools.

- 3.15. There is clear logic in Parliament having made this distinction between eligibility for state-funded schools and independent schools in the 1996 Act, which is replicated within the Mayor's UFSM scheme. There are fundamental differences in the way state and independent schools are funded and regulated, including admissions, exclusions, premises standards, financing, staffing and the curriculum. The implication of independent schools benefiting from a lack of state regulation is that they must raise their own funds by fees, donations, endowments, sponsorship or other sources to pay for the running of the school. This includes providing school lunches. The distinction made in the 1996 Act, and which is replicated in the Mayor's UFSM scheme, is considered fair and equitable.

#### Unfair implications of extending the UFSM scheme to independent schools

- 3.16. As noted above, the purpose of the Mayor's UFSM scheme is to extend eligibility to KS2 children in London's state-funded schools, who are currently not eligible under the government's FSM scheme. There would be unfair consequences if the Mayor extended the UFSM scheme to independent schools in line with the above purpose. It would mean independent-school children in KS2, but not KS1, benefiting from the Mayor's UFSM scheme (the 1996 Act provides universal coverage for all KS1 children at state schools). In the alternative, if the Mayor sought to extend the UFSM scheme to all children in independent schools (including KS1 and the poorest children in KS2), this would be a markedly different scheme that was much more generous than the equivalent for state schools. That would not be an appropriate use of public funds.

#### Administrative complexity of extending the UFSM scheme to independent schools

- 3.17. Local authorities are a key partner in delivering the Mayor's UFSM scheme. Their role includes being responsible for the onward payment of grant funding; and, in some cases, acting as direct commissioner of school catering. This is possible because of the long-established relationship between councils and schools in their area. These relationships do not readily exist between councils and independent schools; so a wholly different, more time-consuming and costlier method for implementation would need to be devised. Extending the Mayor's UFSM scheme to independent schools would create significant administrative complexity in terms of delivery, monitoring and compliance. New governance and monitoring structures would have to be devised, consulted on and introduced.

#### Using state school attendance as a proxy for need

- 3.18. As noted above, by replicating national government eligibility criteria for KS1 for the Mayor's UFSM scheme, the Mayor has sought to use attendance at a state school as a reasonable proxy for need.
- 3.19. Representatives of the Charedi community have previously suggested that a threshold could be considered, by which independent schools that charge annual fees below such a threshold – for example, £5,000 – should be made eligible for the Mayor's UFSM scheme. Such proposals are explored further in the supplementary analysis on independent schools. However, as above, the Mayor's UFSM scheme uses attendance at a state school as a reasonable proxy for need. If parents can afford school fees for an independent school of £5,000 per year, it is questionable whether such families can be considered poor. There would also be the difficulty, highlighted above, that the Mayor would have no way of establishing whether some or all independent schools charging below £5,000 per year could raise funds from elsewhere, or choose to allocate funds differently, in order to prioritise providing FSM.
- 3.20. Other relevant factors in targeting the Mayor's UFSM scheme to state primary schools include the following:
- There are no readily available sub-definitions of the independent sector, through which the scheme could easily be expanded to ensure that only families in poverty, or suffering financial

hardship, could benefit. To expand the Mayor’s UFSM scheme in such a way would be complex and take time to set up – this would significantly delay the continued roll-out of the policy.

- There are no national food standards for independent schools; and no existing commissions or contracts between local authorities and fee-paying schools. These would take time to put in place.
- Details of implementation contracts sit with local authorities, not the GLA.

3.21. The equalities section of MD3146 relating to the Mayor’s UFSM scheme (see Appendix B) contains detailed analysis of the independent school sector; and supplementary analysis undertaken in support of the policy. This analysis sets out, in detail, additional justification for not extending the Mayor’s UFSM scheme to non-state schools. We refer the Mayor to MD3146 (particularly paragraphs 3.4 to 3.45), which is included as Appendix B, as these issues are still relevant and should be considered. As noted in this decision, the IIA, EqIA and analysis of the independent school sector have been refreshed since MD3146 was decided.

### NMSS

3.22. In 2025–26, the Mayor’s UFSM scheme was extended to include KS2 pupils in NMSS in London. Under section 337A of the 1996 Act, NMSS are schools for children with SEND, that the DfE has approved under section 342 of that Act. 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 in the same way as academies. NMSS 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 NMSS.

3.23. Extending the Mayor’s USFM scheme to NMSS was consistent with the existing policy rationale that the Mayor’s scheme replicates, for KS2 children, the national government eligibility criteria for KS1 UIFSM. NMSS were therefore included in borough allocations for the Mayor’s UFSM scheme in 2025–26. Further information on pupils with SEND is included in the EqIA and the separate independent schools analysis.

3.24. The monitoring and evaluation strategy for the first year of the scheme incorporates consideration of protected characteristics and the EqIA. Any findings from this work will be used to consider any further mitigation required through the scheme in 2026–27.

## **4. Other considerations**

### Key risks and issues

4.1. The key residual risks and issues are highlighted in the table below.

| <b>Risk</b>   | <b>RAG rating</b> | <b>Mitigation</b>  |
|---|-------------------|--|
| Claims for pupil premium decrease in schools, especially with Transactional Protection ending in July 2026. | Red               | <ul style="list-style-type: none"> <li>• Significant Mayoral investment in FSM universal registration is unlocking millions in previously missed pupil premium funding for schools.</li> <li>• The UFSM team is closely monitoring pupil premium trends, and working with the DfE and the DWP, to understand how schools will identify eligible children once national FSM criteria change.</li> </ul> |

|  |       |   |
|--|-------|---|
| Government UFSM expansion impacts data accuracy and funding allocations. | Amber | <ul style="list-style-type: none"> <li>• Continued check-ins with the DfE to understand what national changes mean for London.</li> <li>• A plan is being developed to continue communicating to London's local authorities and schools on the expansion.</li> <li>• A funding model will allow flexibility for final payments to local authorities during the year.</li> </ul> |
|--|-------|---|

#### Conflicts of interest

4.2. There are no conflicts of interest to note for any of the officers involved in the drafting or clearance of this decision form.

#### Links to Mayoral strategies and priorities

4.3. This programme links to the Mayor's delivery of the SIYL programme, which includes the following core objectives:

- children and young Londoners achieve the health and learning outcomes they need to thrive at every stage of development
- children and young Londoners have the positive opportunities needed to be successful
- Londoners have the skills they need to improve their lives.

### **5. Financial comments**

5.1. Approval is sought for the following:

- Spend of up to £99.4 million (spanning two financial years (2026-27 and 2027-28), but one academic year (2026-27)) to continue providing grants to eligible local authorities, so they can in turn provide on-grants to local state-funded primary schools, and NMSS, to deliver UFSM to KS2 children in the 2026-27 academic year. The amount granted to each borough will depend on how many of its primary-school children are eligible for government-funded FSM. This includes £95.3 million core allocations, plus: up to £4.1 million funding for kosher meals; additional funding where exceptional costs arise for children attending special schools; additional funding for higher uptake; and scheme costs.
- The final funding allocations to London local authorities, and the payment model outlined in paragraphs 2.5 and 2.7, above – after considering the EqlA (at Appendix A).
- Delegation of authority to the Executive Director of Communities and Skills to make scheme-level decisions, which will confirm the additional funding amounts in relation to high uptake and core allocations, to reflect the actual Universal Credit data for financial years 2026-27 and 2027-28.

5.2. The £99.4 million spend will be funded from the UFSM scheme budget, part of the Supporting and Inspiring Young London programme, across financial years 2026-27 and 2027-28. The current proposed budget phasing across the financial years is:

- £71,381,404 in 2026-27 (which includes 80 per cent core allocations at £70.7 million; and Jewish school funding)
- up to £28 million in 2027-28 (which covers the remaining 20 per cent of initial core calculations, plus top-up and scheme costs).

The final figure is subject to change, as the final payments will be amended once the in-year data is received.

- 5.3. This budget includes up to £4.1 million ringfenced funding for additional costs, including provision for:
- a higher price of providing kosher meals (funded at £3.85 per meal) for Jewish schools, in response to the findings of the EqIA at Appendix A
  - any exceptional costs arising for special schools to support the higher cost of meals for pupils with SEND, where needed.
  - schools claiming for higher uptake.
- 5.4. The GLA will provide funding to local authorities equivalent to £3 per meal. This means the total expected number of pupils eligible for UFSM in each borough has been multiplied by £3 per day in the academic year (190 days), to finalise allocations with an assumed take-up of at least 87 per cent.
- 5.5. The funding allocation in future financial years will be subject to the normal annual budget-setting process and is subject to change.
- 5.6. Any contracts that commit the GLA in future financial years will be subject to appropriate break clauses.

## **6. Legal comments**

### Powers to undertake the requested decisions

- 6.1. The decisions requested fall within the general power of the Mayor (exercisable by the Mayor on behalf of the GLA) in section 30 of the Greater London Authority Act 1999 (GLA Act), to do anything that he considers will further any one or more of the GLA's principal purposes. Those principal purposes include the promotion of social development in Greater London. Section 34 of the GLA Act also allows the Mayor to do anything that is calculated to facilitate, or is conducive or incidental to, the exercise of any functions of the GLA exercisable by the Mayor (including the general power in section 30). In formulating the proposals in respect of which a decision is sought, the GLA has related statutory duties to:
- have due regard to the principle that there should be equality of opportunity for all people (section 33(1) of the GLA Act)
  - consider how the proposals are best calculated to promote:
    - improvements in the health of persons in Greater London
    - the reduction of health inequalities between persons living in Greater London, (section 30(5) of the GLA Act)
  - consult with such bodies or persons as the GLA may consider appropriate in the particular case (section 32(1) of the GLA Act).

In taking the decisions requested of him, the Mayor must comply with the PSED. To this end, the Mayor should have particular regard to section 3 (above) of this report.

### Grant funding

- 6.2. This decision seeks approval to spend up to £99.4 million to continue the Mayor's UFSM scheme. The budget will be used by the GLA to provide grant funding to local authorities for the purpose of UFSM. The funding received by the local authorities will be either on-granted to schools in their local

authorities, or used to procure catering services for the purpose of delivering UFSM. To that end, the GLA will be funding the provision of UFSM to school children by either the local authorities, or schools in their areas via on-granting. There is no supply of goods or services to the GLA; accordingly, the funding may be viewed as a grant rather than a contract for services. Officers are reminded to comply with section 12 of the Contracts and Funding Code. Furthermore, before the additional funding is provided, officers must put in place either deeds of variation of existing funding agreements, or new funding agreements, between the GLA and the recipient local authorities.

### Subsidy control

- 6.3. The Subsidy Control Act 2022 (SC Act) requires that grant funding is assessed in accordance with a four-limbed test, to determine whether the grant funding amounts to a subsidy within the meaning of the SC Act. As explained above, the grant funding will be provided to local authorities to provide UFSM directly; or to be on-granted by them to schools in their areas, in order to provide UFSM. In providing the UFSM, the local authorities will be providing a public service. To that end, the proposed grant funding does not meet the first limb of the four-limbed test; and, therefore, does not amount to a subsidy for the purposes of the SC Act.

### Delegation

- 6.4. Under section 38 of the GLA Act, any function exercisable by the Mayor on behalf of the GLA may also be exercised by a member of the GLA's staff subject to any conditions that the Mayor sees fit to impose. The Mayor may therefore make the requested delegation to the Executive Director of Communities and Skills, if he so chooses.

## **7. Planned delivery approach and next steps**

- 7.1. A detailed project plan has been developed, alongside a timeline for each specific deliverable:

| <b>Expected milestones</b>   | <b>Timeframe</b> |
|--|------------------|
| Grant agreement signatures and commence grant giving process – grant-funding milestone 1 | August 2026      |
| Implementation of UFSM policy for Year 4   | September 2026   |
| Early access to census data  | March 2027       |
| Grant-funding milestone 2  | April 2027       |

- 7.2. The delivery methodology will build on the success of previous years, and can be mapped over three work streams:
- internal operations and governance
  - policy delivery (including comms and engagement)
  - delivery (including monitoring and evaluation).
- 7.3. The governance structures allow for continued engagement with local authorities (through regular meetings and other forums); and other core stakeholders (via regular updates and highlight reporting).
- 7.4. Delivery will continue to be informed by the IIA and the EqIA. It is underpinned by a theory of change, and an integrated evaluation developed with a series of evaluation partners.

7.5. There will be a communications and engagement plan as a key delivery arm. There will be regular engagement with borough stakeholders; and a regular set of communications that are in line with core messaging.

**Appendices and supporting papers:**

- Appendix A – Equality Impact Assessment
- Appendix B – [MD3146 Primary School Universal Free Schools Meal Provision 2023-24](#)
- Appendix C – [MD3380 Delivery Plan – Supporting and Inspiring Young London | London City Hall](#)
- Appendix D – Supplementary Analysis

**Public access to information**

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will be published either within one working day after it has been approved or on the defer date.

**Strategic Programmes**

**Does this decision seek approval for activity falling within the remit of a programme delivery plan? YES**

If YES, which programme does this fall within: Supporting and Inspiring Young London

**Part 1 – Deferral**

**Is the publication of Part 1 of this approval to be deferred? NO**

**Part 2 – Sensitive information**

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

**Is there a part 2 form? NO**

**ORIGINATING OFFICER DECLARATION:**

Drafting officer to confirm the following (✓)

**Drafting officer:**

Olumide Adisa and Sara-Jane Millar have drafted this report in accordance with GLA procedures and confirms the following:

✓

**Sponsoring Director:**

Tunde Olayinka has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.

✓

**Mayoral Adviser:**

Joanne McCartney has been consulted about the proposal and agrees the recommendations.

✓

**Advice:**

The Finance and Legal teams have commented on this proposal.

✓

**Mayoral Delivery Board**

This decision was agreed by the Mayoral Delivery Board on 29 June 2026.

**CHIEF FINANCE OFFICER:**

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

**Date:** 29 June 2026

**Signature:**



**pp Peter Sebastian, Assistant Director, Financial Services  
on behalf of Fay Hammond**

**CHIEF OF STAFF:**

I am satisfied that this is an appropriate request to be submitted to the Mayor.

**Date:** 29 June 2026

**Signature:**

