

MAYOR OF LONDON



Universal Free School Meals

Equality Impact Assessment, June 2026

COPYRIGHT

**Greater London Authority
JUNE 2026**

Published by
Greater London Authority
City Hall
Kamal Chunchie Way
London E16 1ZE

enquiries 020 7983 4000
minicom 020 7983 4458

Photographs ©GLA

Copies of this report are available
from www.london.gov.uk

Contents

1. Executive summary	2
Age	4
Disability (special educational needs and disabilities)	4
Race	4
Religion or belief	4
Sex	5
Sexual orientation	5
Socio-economic status	5
2. Introduction	7
Year one (2023-24 academic year)	9
Years two and three (2024-25 and 2025-26 academic years)	9
Year four (2026-27 academic year)	9
FSM eligibility	10
3. Baseline profile	16
SEND schools in London	17
FSM for children with SEND	18
SEND and ethnicity	18
SEND and links to poverty	20
London's ethnic profile	21
Primary school pupil ethnicity	22
Socio-economic classification by ethnic group	24
London's religious/belief profile	25
4. Consultation and engagement	48
5. Assessment	50
6. Conclusions and next steps	77
7. Annex one: Glossary of abbreviations and terms	78
8. Annex two: EqIA methodology	81
Study area	82
9. Annex three: Engagement overview	86

1. Executive summary

Overview of the Universal Free School Meals (UFSM) scheme

In February 2023, the Mayor of London announced the spend of £130 million, to fund Universal Free School Meals (UFSM) for all children in state-funded primary schools in London, for the 2023-24 academic year. The scheme applies to state-funded maintained schools, academies, through-schools, special schools and alternative provision.

The Mayor committed to continuing the UFSM scheme in 2024-25, allocating £140 million through MD3224 (January 2024). Further funding was approved for 2025-26 through MD3332 (March 2025) – with a total programme budget of up to £147.5 million across 2025-27, and borough funding allocations for 2025-26, confirmed in DD2749 (May 2025). The Mayor has confirmed his intention to fund UFSM until the end of his Mayoral term. Borough funding allocations for 2026-27 will be confirmed in summer 2026, following the publication of the latest Department for Education (DfE) data.

The UFSM scheme saves families up to £500 per child per year.¹ Its primary aim is to reduce cost-of-living pressures, and improve children's health and wellbeing.

Purpose and scope of the Equality Impact Assessment

This Equality Impact Assessment (EqIA) was first published in 2023. It was updated in winter 2024 to reflect the scheme's extension, and findings from the independent evaluation by Impact on Urban Health (IoUH).² This updated EqIA incorporates national policy changes, new research and the latest available data.

The EqIA assesses the positive and negative impacts of the UFSM scheme on people with protected characteristics under the Equality Act 2010. Although socio-economic status is not a protected characteristic, its impacts are also considered; this is due to the policy's focus on household finances and food insecurity.

This edition of the EqIA considers how upcoming changes to the national FSM policy will impact the London-based UFSM scheme. It is outside the GLA's scope to assess the full equalities impact of these policy changes. However, with this EqIA, the GLA seeks to assess how national changes could lead to positive or negative equalities impacts for the

¹ Find more information on our calculations and data: GLA, [Free School Meals](#)

² IoUH, [More than a meal: An independent evaluation of universal primary free school meals for children in London](#), November 2024

Mayor's UFSM scheme specifically. The DfE has conducted its own EqIA on the policy changes as a whole.³

Note on previous versions

The first version of the EqIA for the UFSM scheme was published in July 2023. The original report,⁴ the UFSM Interim EqIA, was commissioned by the GLA, and produced by ARUP (who conducted the EqIA on the GLA's behalf). ARUP's findings and analysis have formed the basis of subsequent versions of this EqIA, including this 2026 edition. However, ARUP has not played an ongoing role in developing these reports. The GLA has updated the data, analysis and assessments in-house – building on ARUP's original 2023 findings to reflect changing policy context, and incorporating new evidence and evaluations.

Policy context: National FSM changes from September 2026

From September 2026, national FSM eligibility will expand to include all children in households receiving Universal Credit. This removes the £7,400 income cap. This change does not affect delivery of the Mayor's UFSM scheme for London's state-funded primary schools; however, it has wider implications for funding and schools' delivery.

This EqIA reflects on how these national policy changes might affect the equalities impact of the Mayor's UFSM scheme in 2026-27. They are significant; but initial assessment suggests the changes will not have any major negative equalities impacts in delivering the Mayor's UFSM scheme.

However, a fuller assessment is not possible until the roll-out is under way, and there is more data relating to the cohort of pupils meeting the expanded criteria (particularly, relating to their protected characteristics). The national expansion's effects on the equalities impacts of the London scheme will be closely monitored; and assessment will be included in future editions of this EqIA.

The DfE has published its own initial EqIA as part of the Children's Wellbeing and Schools Bill.⁵ This looks at the anticipated impact of the policy expansion nationally on different protected characteristics (as much as available data allows). It concludes that expanding FSM eligibility "will have a positive impact on the protected characteristics of age, disability, race, religion or belief and sex". DfE's assessment has been considered in our evaluation of the potential impacts, for London, of the policy change.

³ DfE, [Equality impact assessment: Children's Wellbeing and Schools Bill](#), January 2026 (chapter 42, Free School Meals, sections 271-289)

⁴ ARUP/GLA, [Universal Free School Meals \(UFSM\) Interim Equality Impact Assessment](#), July 2023

⁵ DfE, [Equality impact assessment: Children's Wellbeing and Schools Bill](#), January 2026 (chapter 42, Free School Meals, sections 271-289)

A separate analysis on independent schools has been updated, and is available to read on the GLA's website.⁶

Impact on protected characteristics and existing inequalities

Age

UFSM has strong positive impacts on primary-aged children (7-11), supporting nutrition, concentration and wellbeing, while easing financial pressures for families. Concerns remain around the transition to secondary school – though national FSM expansion is expected to benefit more children aged 2-4 and 11-19, partially mitigating this issue. Evidence suggests FSM uptake declines in older primary-school year groups, highlighting the need for further investigation.

Disability (special educational needs and disabilities)

Children with special educational needs and disabilities (SEND) disproportionately experience poverty, and benefit from universal access to school meals. While UFSM benefits pupils with SEND, and uptake has risen amongst this group, complex dietary needs and higher delivery costs might otherwise limit equitable access. The GLA provides top-up funding to special schools to address exceptional costs – though pressures remain, particularly in mainstream settings. It is still the case that meals for children with SEND, and for special schools, have higher dietary needs and requirements, and price points.

Race

UFSM benefits children from ethnic minority backgrounds by removing potential barriers for families wishing to complete application forms, but who do not have English as a first language. It also supports families with no recourse to public funds (NRPF). However, culturally appropriate provision is not always consistent; this can affect take-up in some communities. Continued engagement with families, and diversification of menus, are essential to maximise benefits.

Religion or belief

While many religious dietary needs are met, gaps remain for some faith groups – including Jewish, Sikh and Hindu pupils. Additional funding for kosher meals, and commissioned research into faith-based provision, have informed improvements – with recommendations feeding into future delivery, and monitoring of food quality and cultural appropriateness.

The funding-grant conditions and principles continue to ask boroughs to ensure that school food:

⁶ GLA, Supplementary analysis on London school sector, June 2026

- adheres to national school food standards
- is culturally appropriate.

The GLA supports work in the areas of improving or monitoring the quality of school food.

Sex

The scheme particularly benefits lone-parent households (most of which are headed by women), by reducing food costs and time pressures. While qualitative evidence indicates positive impacts, further data is needed to understand uptake patterns among lone-parent families.

Sexual orientation

No adverse impacts have been identified. Given evidence of economic disadvantage among LGBTQ+ families, the universal offer provides indirect financial benefits; and helps mitigate cost-of-living pressures.

Socio-economic status

Independent evaluation shows the greatest financial gains for low-income households, and those just above the FSM eligibility threshold. These include reduced debt, lower financial stress, and improved household food security.

The GLA has actively mitigated risks to Pupil Premium (PP) funding through UFSM registration approaches, training and awareness-raising.⁷ As of March 2026, 28 boroughs had identified over 22,200 additional eligible pupils through UFSM registration. This has generated almost £50 million in additional funding for schools, including PP.⁸ Monitoring will continue as FSM and PP eligibility criteria diverge nationally from 2026.

The impacts of Transitional Protections (TP) coming to an end continue to be monitored.⁹

⁷ Universal registration refers to any local authority processes aimed at increasing the registration of entitled children for FSM. These processes typically take an 'opt-out, auto-award' approach, where authorities use existing data to identify and register entitled children. However, there are other methods, such as including FSM registration opt-in fields on benefits application forms or establishing opt-in processes coordinated with schools.

⁸ GLA London Datastore, [FSM universal registration approaches: Impact data from 28 London boroughs, 2023/24 – 2025/26](#), March 2026

⁹ The FSM protections policy was introduced in 2018 to protect those eligible for FSM from becoming ineligible while Universal Credit was being rolled out. It is the DfE's intention that all protections will be discontinued from September 2026 – the start of the 2026-27 school year. From this point, families must meet the eligibility criteria to be entitled to FSM; and will cease to be entitled if they no longer meet the published criteria.

Wider anticipated impacts of the policy

- **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.
- **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.
- **PP safeguarded to date:** Evidence shows no significant reduction in PP funding for schools since UFSM was introduced; this is supported by borough-level UFSM registration approaches. Boroughs have been able to unlock funding they were otherwise missing out on.
- **National FSM expansion (from September 2026):** The expansion of national FSM eligibility to all children in households on Universal Credit does not affect the Mayor's universal offer; but has wider funding and equity implications. These will require ongoing monitoring as further data becomes available.

Key areas for ongoing consideration

The EqIA identifies several areas requiring continued monitoring and action:

- ensuring school meals meet diverse cultural, religious and SEND-related dietary needs
- assessing the adequacy of per-meal funding amid inflation and higher-cost provision
- monitoring the impact of national FSM expansion on London's schools and funding flows
- tracking longer-term implications for PP identification and income.

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

2. Introduction

Purpose of the report

An EqIA is a way to systemically identify and assess the potential effects arising from the design and implementation of a proposed plan, policy, project or strategy, for people sharing one or more protected characteristics (as defined under the Equality Act 2010).

Under section 149 of the Equality Act 2010, which describes the Public Sector Equality Duty (PSED), all public bodies are required to have due regard to the need to:

- eliminate discrimination, harassment and victimisation
- advance equality of opportunity, and foster good relations, between persons who share a relevant protected characteristic and persons who do not.

Although low income and socio-economic status are not identified protected characteristics under the Equality Act 2010, low-income groups have been included as part of this assessment. This is because low income and deprivation typically overlap with other protected characteristics, such as disability and 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. It also documents how these considerations have influenced the decision-making process. It ensures that measures can be put in place to:

- mitigate any potential adverse effects for protected characteristic groups
- secure the potential benefits
- promote equality of opportunity.

An EqIA is an ongoing process. This EqIA has been regularly updated (most recently in June 2026, ahead of the roll-out of year four of the policy); it will continue to be reviewed and updated if there are any new policy updates, or evidence that emerges.

The policy

The Mayor's UFSM scheme is consistent with the government's existing funding of school meals, as outlined in DfE guidance,¹⁰ in that it covers:

- state-funded primary schools
- pupil referral units
- special schools, including:
 - maintained schools
 - academies
 - free schools (including faith schools)
 - non-maintained special schools (NMSS).

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

Engagement and analysis highlighted a need to further investigate the potential impact of the policy on schools across the whole education sector, including independent schools. The GLA's additional analysis on independent faith schools can be found as a supplementary paper to the EqIA.¹¹ It was completed in June 2023; it was subsequently kept under review, and has been updated to ensure all considerations were made in the policy development of the Mayor's UFSM scheme.

Local authorities (LAs) can also place pupils with education, health and care plans (EHCPs) in independent special schools, when their needs cannot be met in the state sector. A 2024 report by London Councils found that, in the capital, use of independent school provision for young people with an EHCP had risen by 31 per cent over the previous five years.¹²

¹⁰ DfE, [Free school meals: guidance for local authorities, local -authority-maintained schools, academies and free schools](#), updated 13 May 2026

¹¹ GLA, [Supplementary analysis on London school sector](#), June 2026

¹² Mime Consulting for London Councils, [Inclusion in London's Schools](#), November 2024

Ultimately, UFSM funding is a limited pot of money that cannot 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 meals.

The UFSM scheme is just one measure within a range of steps the Mayor is taking to help Londoners deal with the cost-of-living crisis. In 2025, as part of an ongoing commitment to deliver food support and funded activity sessions to young people, the Mayor launched the £6 million Holiday Hope programme. The Mayor actively promotes benefit take-up with income-maximisation campaigns and advice services, helping low-income Londoners claim millions in entitlements each year.

Year one (2023-24 academic year)

In 2023-24, the UFSM was made available to all Key Stage 2 (KS2) pupils in London's state-funded primary schools. This benefited an additional 287,000 children, and saved families over £440 per child. The scheme helped reduce cost-of-living pressures – particularly for families on lower incomes and those with protected characteristics, who are disproportionately affected by food insecurity. A single standard meal rate was applied across all boroughs, to ensure equitable provision despite historic differences in delivery costs.

In response to findings from the EqIA, additional funding was also made available to cover the higher price of providing kosher meals for Jewish state-funded schools (funding went up to £3.50 per meal). This additional funding also sought to cover any exceptional costs arising for state-funded special schools, to support the higher cost of meals for pupils with SEND (where needed).

In 2022-23, before the UFSM scheme launched, five London boroughs were already funding UFSM to their London primary state-funded schools. Funding has been allocated to them, in each year, as if they had not previously provided this function.

Years two and three (2024-25 and 2025-26 academic years)

To continue supporting the scheme, the policy extension for 2024-25 increased the meal price from £2.65 to £3.00. Per-meal funding remains £3.00 for 2025-26 and 2026-27.

Grant terms and conditions will still require that funding is spent on delivery 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 Years 2 and 3, there was an additional requirement for boroughs to implement good practice related to auto-enrolment. Boroughs received additional funding to support these activities.

Year four (2026-27 academic year)

The GLA is preparing to deliver year four of the UFSM scheme from September 2026.

The change to national FSM eligibility criteria, to include all children in households on Universal Credit, will come into effect from the start of the 2026-27 academic year. This does not change the offer in the Mayor's UFSM scheme. The main difference is that a higher proportion of London's meals, in state-funded primary schools, will be funded by the government than at present. The universal offer of FSM for state-primary pupils in London remains in place.

The government is applying a 1.66 per cent uplift to its FSM funding in the National Funding Formula from September 2026, to reflect inflation. Once this uplift is applied, schools will receive approximately £2.65 per meal, for each eligible pupil, from national government. The Mayor's UFSM scheme will continue to fund meals for all non-government-funded, FSM-eligible pupils, at £3 per meal; this is calculated on the basis of an 87 per cent take-up rate. The Mayor will also offer top-up funding for any schools with high uptake, and special schools; and to provide kosher meals.

Meal prices must continue to be monitored, to assess unintended effects of the government expansion on the Mayor's scheme.

This EqIA includes an initial assessment of the Universal Credit expansion using available data. The GLA will continue assess the full impacts of the expansion on London as it is introduced.

Additional funding will also be made available in year four of the UFSM scheme, to cover the higher price of providing kosher meals (rising to £3.85 per meal) for Jewish state-funded schools. It will also cover any exceptional costs arising for state-funded special schools to support the higher cost of meals for pupils with SEND, where needed. Additional funding was provided on the same basis in year one.

Background

FSM eligibility

All state-funded school children in England at KS1 (Reception through to Year 2) receive government-funded Universal Infant FSM. Before September 2023, when the Mayor's UFSM scheme was introduced, FSM were only offered to older KS2 children (Years 3-6) if they met specific eligibility criteria for FSM, set by national government.

Until September 2026, to be eligible for government FSM, a household could earn no more than £7,400 a year; or had to meet other key criteria. According to 2024-25 school year data, only 25.4 per cent of London's state-funded primary school pupils were known to be eligible for government FSM, under this criteria.¹³ Research by Child Poverty Action Group

¹³ DfE, [Schools, pupils and their characteristics – academic year 2024/25](#), 5 June 2025

(CPAG) has also shown that hundreds of thousands of school children living in poverty are not eligible for government FSM, under this criteria.¹⁴ The Mayor's introduction of UFSM in 2023 means that all state-funded primary school children in London now get free meals, regardless of the government's criteria. However, it remains important that eligible KS2 children are registered for the national scheme to ensure schools receive maximum pupil premium funding and families get all the wider benefits they are entitled to.

Although data on eligible school children is held at government level, the current process means that parents have to apply to their borough, or via their child's school, to claim government-funded FSM for KS2 children.

Increasingly, with the Mayor's support, London boroughs are rolling out FSM universal registration approaches, such as auto-enrolment, to register eligible children on an opt-out basis. This removes the burden on schools and families. Historic government estimates on claim rates indicated that around 11 per cent of KS2 school children eligible for FSM had not taken up the offer. However, this figure was from research in 2013; a more recent estimate is not available.¹⁵

From September 2026, the government's FSM eligibility criteria will see a major change. The eligibility criteria will be expanded to all children in households receiving Universal Credit. This is a historic step that, according to the government, will lift approximately 100,000 children nationally out of poverty by 2030.¹⁶

Available DWP data suggests that, out of all the current pupils in Years 2-5 in London (around 371,000), approximately 52 per cent (193,000) are in households on Universal Credit; these pupils will therefore meet the new national FSM eligibility criteria.¹⁷ This compares to the 30 per cent of current pupils (110,000) in Years 2-5 who meet the previous FSM criteria. This means approximately 83,000 more state-primary pupils in London will qualify for government FSM once the criteria changes.

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. Universal Credit replaces six existing means-tested benefits and tax credits, primarily for working-age adults. Universal Credit is a means-tested benefit that takes into account household income and savings. Eligibility is not tied to a set income threshold or legacy

¹⁴ CPAG, [New official data shows 900,000 children in poverty don't qualify for free school meals under national policy](#), 5 June 2024

¹⁵ UK Parliament, [House of Commons written question 100941: Robert Halfon MP \(Harlow\) to the Secretary of State for Education: free school meals](#), tabled 8 October 2020, answered 13 October 2020

¹⁶ DfE, [Expanding free school meals: what parents need to know](#), 4 June 2025

¹⁷ Estimates of the number of KS2 pupils meeting the expanded government FSM criteria in London 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 at GLA London Datastore, [Number of school age children in UC households by school year](#), November 2025

benefits; but is determined by someone's specific situation. This is much broader than the current FSM criteria.

The DfE is due to launch a new Eligibility Checking Service (ECS). LAs will be able to use the ECS to check FSM eligibility.¹⁸

More information is needed to assess the effectiveness of new national eligibility-checking systems, in ensuring all eligible pupils are registered for FSM. The GLA will continue to support boroughs to adopt universal registration approaches, to mitigate against risks of eligible pupils missing out. The government has published its own impact assessment of the roll-out of the expanded FSM criteria, as part of the Children's Wellbeing and Schools Bill.¹⁹ As yet, there is no available data that allows us to analyse, at a London level, the protected characteristics of pupils meeting the expanded criteria. It is therefore not yet possible to assess what the expansion will mean for children from different backgrounds or circumstances. However, we do not anticipate any detrimental equalities implications for the Mayor's London scheme.

Additionally, we do not know how many households in London are eligible for Universal Credit, but do not claim it – and thus cannot receive FSM. Data gaps mean that identifying these families is challenging. If available, analysis of this data will be included in future EqIAs.

These estimates are based on the number of pupils who are currently in households on Universal Credit; but their FSM status will only be confirmed if and when they successfully register for government FSM, in line with the criteria change. Sustained communications to schools and families will be required to ensure those newly eligible will apply for, and benefit from, government FSM. The Mayor will also continue to ask boroughs 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.

Alongside the expanded criteria, the government has confirmed that TP will end. From 1 April 2018, TP were implemented by the DfE in partnership with the DWP. According to DfE, the aims of TP were to:

- minimise the impact of the Universal Credit roll-out, and the introduction of the net-earned threshold to determine eligibility for FSM
- ensure no pupil loses a meal as result of these changes.

The TP scheme was originally set to last until March 2022, but was extended. In June 2025, DfE confirmed its intention to end TP at the close of the 2025-26 academic year. By our understanding, this means eligibility for all pupils will revert strictly to whether they

¹⁸ DfE, Eligibility Checking newsletter, 22 April 2026

¹⁹ UK Parliament, [Children's Wellbeing and Schools Bill](#), updated 8 May 2026

meet the new expanded FSM criteria – regardless of whether they were previously covered by TP. We can assume that most, but likely not all, previously protected children will now be in households receiving Universal Credit, so will maintain their eligibility. These families may then need to register their child for FSM.

Funding implications

Expanding FSM is not expected to reduce the overall funding that state-funded primary schools receive for meals. While the funding source for some meals will shift between the Mayor and the government, this should not affect meal provision in London's primary schools.

The GLA has considered potential equalities impacts – including the risk that perceived funding changes could affect planning for pupils with additional dietary needs. To mitigate this, the GLA is sharing guidance, engaging with boroughs, and revising the funding approach for 2026-27. This is to provide reassurance that overall meal funding will be maintained.

The GLA will continue to offer top-up funding to state primary schools that have uptake above 87 per cent.

Government guidance

Historically, families who were undocumented due to their immigration status, and/or had 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. However, a scheme to make FSM available to these families was introduced during COVID-19. Renewed guidance from June 2025 confirmed that FSM eligibility would be extended, permanently, to children in all households with NRPF.²⁰ Households must complete an application form to demonstrate their eligibility for FSM. Households with NRPF will remain included in the Mayor's scheme without need for further paperwork.

In June 2025, the national government updated FSM guidance on the policy position for children receiving education otherwise than at school (EOTAS).²¹ This guidance states that “no specific provision is made in legislation for FSM to be provided to children who are in receipt of EOTAS”.

However, the guidance says that the government expects LAs to consider making equivalent food provision for children who receive EOTAS, and meet both of the following criteria:

²⁰ DfE, [Providing free school meals to families with no recourse to public funds \(NRPF\)](#), updated 8 May 2026

²¹ DfE, [Free school meals: guidance for local authorities, local -authority-maintained schools, academies and free schools](#), updated 8 May 2026

- 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:

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

Data

The GLA does not routinely collect data on the take-up of meals offered through UFSM, due to the complex and variable nature by which meal take-up is measured across schools, and the burden a monitoring requirement could have for schools.

Instead, take-up is understood using alternative sources, including data from the management information system (MIS) provider Arbor. The Arbor data presented in this report is for the 2024-25 academic year, unless otherwise stated.²² As of 2024-25, Arbor’s data covered around 21% (384 schools) of schools delivering UFSM in London.

Importantly, it is not known whether pupils in schools using Arbor’s MIS are systematically different from pupils in schools using other MIS, so it is difficult to say whether Arbor’s data is representative of all schools delivering UFSM in London. Therefore, the GLA interprets

²² GLA London Datastore, [Arbor meals data - London Datastore](#), May 2026

these results as indicative, but benefits from understanding high-level trends across pupil characteristics.

3. Baseline profile

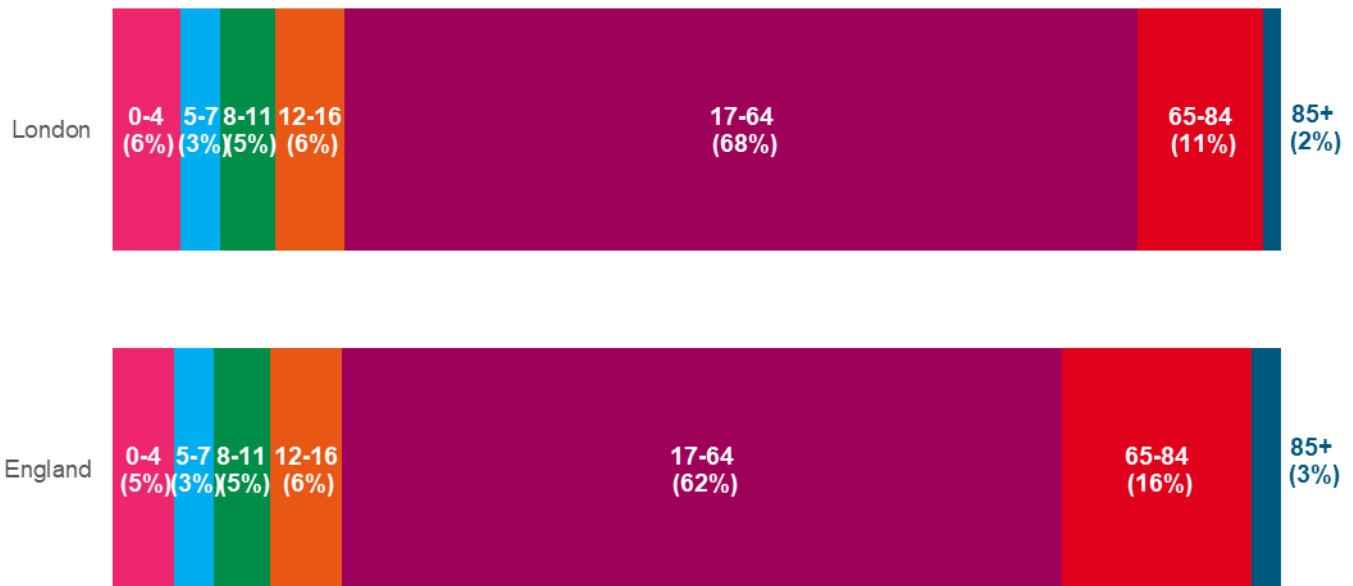
Population

The most recent estimate of London’s population is 9.1 million.²³ According to the GLA’s population projections, London’s population is projected to increase to 9.7 million by 2040.²⁴ There are large variations in population growth trends between LAs in London.

Age

As per Figure 1, 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 84.²⁵

Figure 1: Population age breakdown for England and London, 2024



²³ ONS, Population estimates for England and Wales: mid-2024, 30 July 2025

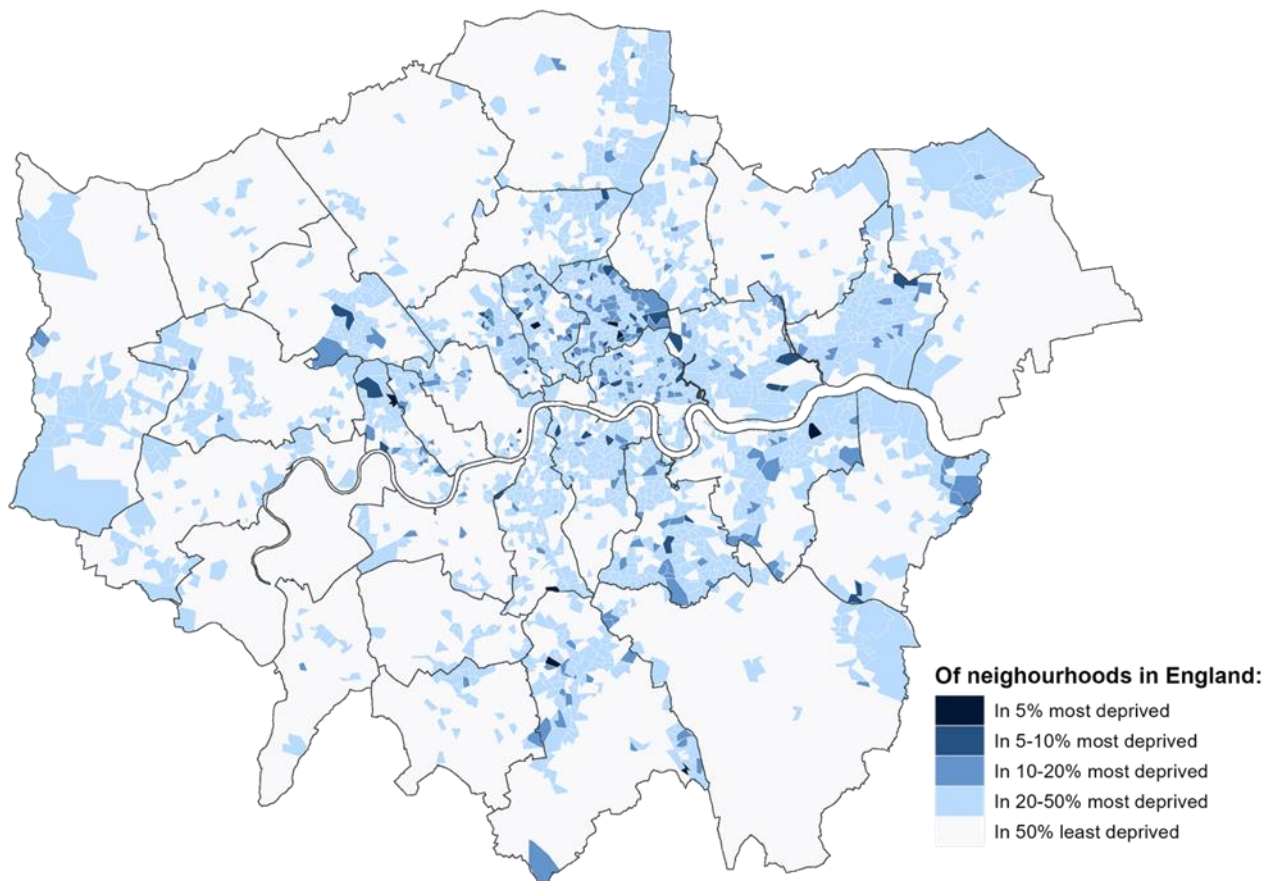
²⁴ GLA 2022-based projections, 10-year central fertility variant

²⁵ ONS, Population estimates for England and Wales: mid-2024, 30 July 2025

Disability

The Indices of Deprivation 2025 provide a suite of measures, on relative levels of deprivation, in seven domains across 33,755 neighbourhoods (called Lower-Layer Super Output Areas) in England. One of the Index of Multiple Deprivation (IMD) domains is health deprivation and disability; this measures the risk of premature death, and the impairment of quality of life through ill health or disability. Figure 2 indicates that higher levels of health deprivation are concentrated in Inner London neighbourhoods – particularly in the boroughs of Hackney and Tower Hamlets.²⁶

Figure 2: Health deprivation and disability in London by neighbourhood, 2025



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 EHCP.

²⁶ MHCLG, [English indices of deprivation 2025: statistical release](#), November 2025

Across London there are 161 state-funded special schools, of which 113 had pupils in Years 3-6.²⁷ In 2024-25, across London's state-funded special schools, there were:

- 1,349 Year 3 pupils
- 1,485 Year 4 pupils
- 1,458 Year 5 pupils
- 1,445 Year 6 pupils.

For Years 3-6, Croydon had the most pupils in state-funded special schools (385).²⁸

FSM for children with SEND

In 2024-25, 39 per cent of pupils in London's state-funded primary schools with SEND support and/or an EHCP are eligible for FSM. The lowest figures are seen in Harrow, at 24 per cent; this is followed by Richmond upon Thames and Redbridge, both at 27 per cent. Among children with SEND in London's state-funded primary schools, eligibility for FSM was 17 percentage points higher than for children without SEND.

There are also three NMSS with KS2 pupils in London – in Hammersmith and Fulham; Haringey; and Hillingdon.²⁹ In 2024-25, these three schools had a total of 48 pupils in KS2 – 17 of whom were known to be eligible for FSM under the criteria at the time. 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. Currently, there is no available data on the number of FSM-eligible NMSS pupils under the expanded criteria.

SEND and ethnicity

Among SEND pupils in state-funded primary schools in London (excluding those with 'unclassified' ethnicity), the category of White accounts for the largest number of pupils (40 per cent).³⁰ This is followed by pupils who identify as Black (20 per cent); Asian (20 per cent each); Mixed (14 per cent) and Other (6 per cent). These figures, along with LA-specific data, are presented in Table 1, below, and exclude those who are 'unclassified'.

²⁷ DfE, [Schools, pupils and their characteristics – academic year 2024/25](#), 5 June 2025

²⁸ DfE, [Schools, pupils and their characteristics – academic year 2024/25](#), 5 June 2025

²⁹ DfE, [Schools, pupils and their characteristics – academic year 2024/25](#), 5 June 2025

³⁰ DfE, [Special education needs in England – academic Year 2024/25](#), 12 June 2025

Table 1: Number of pupils with SEND, by ethnicity, in state-funded primary schools across London, 2024-25

Local authority	Asian	Black	Mixed	White	Any other ethnic group
London (total)	24,278 (20%)	24,625 (20%)	16,909 (14%)	48,133 (40%)	7,412 (6%)
Barking and Dagenham	1,323 (30%)	1,059 (24%)	458 (10%)	1,565 (35%)	65 (1%)
Barnet	618 (12%)	655 (13%)	619 (12%)	2,657 (52%)	607 (12%)
Bexley	336 (9%)	664 (17%)	422 (11%)	2,376 (62%)	59 (2%)
Brent	1,041 (23%)	1,094 (25%)	456 (10%)	1,150 (26%)	709 (16%)
Bromley	288 (6%)	501 (11%)	643 (14%)	3,122 (68%)	70 (2%)
Camden	512 (23%)	393 (17%)	377 (17%)	814 (36%)	172 (8%)
City of London	27 (47%)	7 (12%)	6 (11%)	12 (21%)	5 (9%)
Croydon	763 (14%)	1,616 (30%)	1,043 (19%)	1,919 (35%)	121 (2%)
Ealing	1,286 (27%)	828 (17%)	583 (12%)	1,265 (26%)	857 (18%)
Enfield	290 (6%)	1,158 (24%)	658 (14%)	2,497 (51%)	262 (5%)
Greenwich	550 (10%)	1,529 (28%)	776 (14%)	2,400 (44%)	153 (3%)
Hackney	378 (10%)	1,433 (37%)	583 (15%)	1,200 (31%)	244 (6%)
Hammersmith and Fulham	128 (7%)	452 (26%)	303 (18%)	657 (38%)	191 (11%)
Haringey	215 (6%)	933 (26%)	507 (14%)	1,604 (45%)	304 (9%)
Harrow	1,268 (43%)	290 (10%)	328 (11%)	877 (30%)	180 (6%)
Havering	538 (14%)	451 (12%)	375 (10%)	2,390 (63%)	29 (1%)
Hillingdon	1,301 (26%)	498 (10%)	699 (14%)	2,075 (42%)	363 (7%)
Hounslow	1,431 (33%)	484 (11%)	489 (11%)	1,514 (35%)	457 (10%)
Islington	193 (6%)	753 (24%)	625 (20%)	1,313 (42%)	208 (7%)

Local authority	Asian	Black	Mixed	White	Any other ethnic group
Kensington and Chelsea	43 (4%)	256 (22%)	276 (23%)	408 (35%)	196 (17%)
Kingston upon Thames	312 (13%)	89 (4%)	344 (15%)	1,497 (63%)	124 (5%)
Lambeth	151 (4%)	1,687 (45%)	643 (17%)	1,024 (28%)	205 (6%)
Lewisham	242 (6%)	1,445 (36%)	824 (20%)	1,400 (34%)	152 (4%)
Merton	566 (19%)	411 (14%)	442 (15%)	1,423 (49%)	77 (3%)
Newham	2,511 (48%)	1,126 (21%)	495 (9%)	901 (17%)	230 (4%)
Redbridge	2,140 (50%)	477 (11%)	477 (11%)	1,114 (26%)	61 (1%)
Richmond upon Thames	216 (9%)	72 (3%)	340 (15%)	1,582 (69%)	69 (3%)
Southwark	247 (6%)	1,733 (41%)	675 (16%)	1,241 (30%)	301 (7%)
Sutton	550 (17%)	286 (9%)	398 (13%)	1,855 (59%)	70 (2%)
Tower Hamlets	3,183 (61%)	489 (9%)	537 (10%)	911 (17%)	126 (2%)
Waltham Forest	930 (22%)	690 (17%)	642 (15%)	1,696 (41%)	201 (5%)
Wandsworth	529 (15%)	795 (23%)	667 (19%)	1,297 (38%)	159 (5%)
Westminster	172 (12%)	271 (19%)	199 (14%)	377 (27%)	385 (27%)

Note: Percentages in brackets refer to the proportion of pupils in state-funded primary schools with SEN (SEN support and/or EHC plan) in each ethnic group. "Unclassified" ethnicity is excluded from this table.

SEND and links to poverty

In 2016, the Joseph Rowntree Foundation published research on the links between SEND and poverty in the UK.³¹ The most up-to-date DfE statistics show that there are still links between SEND and FSM eligibility, which is commonly used as a proxy for children living in poverty (albeit, this approach has widely recognised weaknesses).

³¹ Joseph Rowntree Foundation, [Special educational needs and their links to poverty](#), January 2016

In the 2024-25 academic year, 27 per cent of London's FSM-eligible pupils are identified as having SEND.³² By contrast, only 15 per cent of non-eligible pupils are identified as having SEND.³³

Children who have SEND are also more likely to be excluded than peers who do not. In 2023-24, the rate of permanent exclusion was 3.6 times higher in pupils with SEND than in pupils without SEND. There are links with poverty too; in 2023-24, London children receiving FSM were 3.9 times more likely than their peers to be excluded. In England as a whole, pupils in the most deprived neighbours were over 13 times³⁴ more likely to be permanently excluded than those in the least deprived neighbourhoods.³⁵

There is some evidence that ethnicity plays a part in children's likelihood of being identified as having SEND. Greater understanding of the links between ethnicity, SEND and poverty is needed – particularly for at-risk groups, such as children from Gypsy, Roma and Traveller communities.³⁶

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.³⁷

Ethnicity

London's ethnic profile

As shown in Figure 3, London is more ethnically diverse than England.³⁸ 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 London's population identify as Asian, Black, mixed and/or other, compared to the rest of England.

³² DfE, [Special education needs in England – academic Year 2024/25](#), 12 June 2025

³³ DfE, [Special education needs in England – academic Year 2024/25](#), 12 June 2025

³⁴ DfE, [Suspensions and permanent exclusions in England – academic year 2023/24](#), 10 July 2025

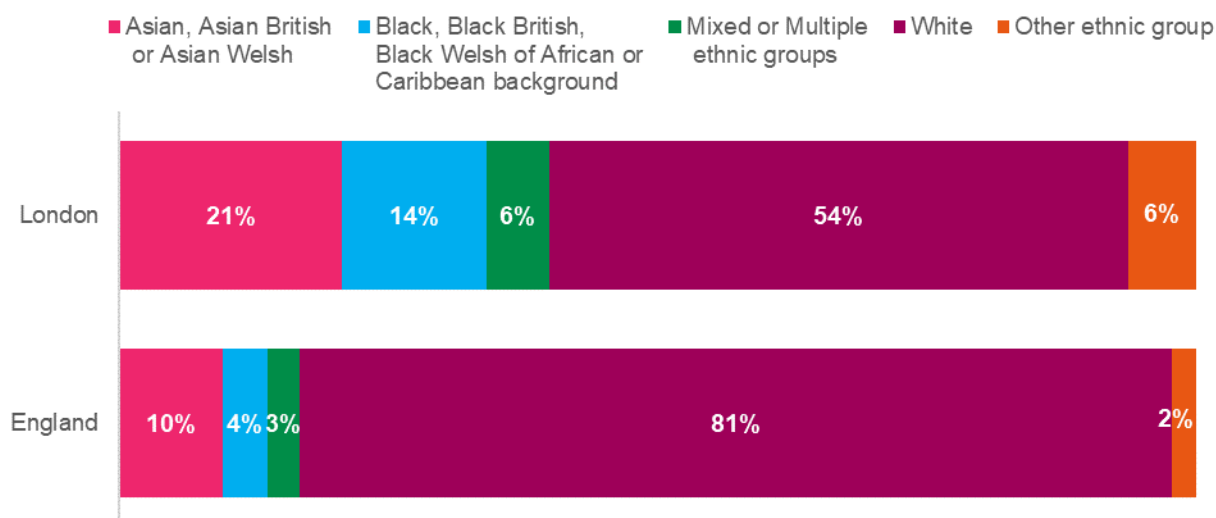
³⁵ Defined as schools in the most deprived IDACI decile (1) and least deprived IDACI decile (10).

³⁶ Joseph Rowntree Foundation, [Special educational needs and their links to poverty](#), January 2016

³⁷ DWP, [Below Average Resources: developing a new poverty measure](#), published 18 January 2024; updated 9 January 2025

³⁸ ONS, Census 2021: ethnic group. Accessed via [Nomis](#).

Figure 3: Ethnicity in London and England, 2021



Primary school pupil ethnicity

According to data from the 2024-25 school year, the majority of state-funded primary school pupils in London (all years, excluding ‘unclassified’) identify as White (40 per cent). This is followed by Asian (25 per cent); Black (16 per cent); mixed (13 per cent); and then ‘any other ethnic group’ (7 per cent).³⁹

Table 2: Pupil ethnicity in state-funded primary schools in London (2024-25)

Local authority	Asian	Black	Mixed	White	Any other ethnic group
London (total)	166,961 (25%)	104,942 (16%)	85,765 (13%)	262,771 (40%)	43,746 (7%)
Barking and Dagenham	8,873 (37%)	5,146 (22%)	2,218 (9%)	7,177 (30%)	471 (2%)
Barnet	4,292 (15%)	2,672 (9%)	3,378 (12%)	15,008 (52%)	3,591 (12%)
Bexley	3,384 (15%)	3,438 (16%)	2,337 (11%)	12,301 (56%)	389 (2%)

³⁹ DfE, [Schools, pupils and their characteristics – academic year 2024/25](#), 5 June 2025

Local authority	Asian	Black	Mixed	White	Any other ethnic group
Brent	8,352 (33%)	4,268 (17%)	2,156 (8%)	6,739 (26%)	4,104 (16%)
Bromley	2,997 (11%)	2,670 (10%)	3,901 (14%)	16,972 (63%)	560 (2%)
Camden	2,072 (21%)	1,512 (15%)	1,531 (16%)	3,919 (40%)	756 (8%)
City of London	103 (41%)	12 (5%)	49 (20%)	70 (28%)	15 (6%)
Croydon	6,549 (21%)	8,110 (26%)	5,446 (17%)	10,404 (33%)	811 (3%)
Ealing	9,142 (31%)	3,384 (12%)	3,068 (11%)	8,088 (28%)	5,531 (19%)
Enfield	2,439 (9%)	5,291 (19%)	3,615 (13%)	14,746 (53%)	1,721 (6%)
Greenwich	3,081 (13%)	6,578 (28%)	3,349 (14%)	9,837 (42%)	736 (3%)
Hackney	1,969 (12%)	5,059 (30%)	2,586 (15%)	6,337 (37%)	1,134 (7%)
Hammersmith and Fulham	817 (9%)	1,624 (19%)	1,491 (17%)	3,615 (42%)	1,107 (13%)
Haringey	1,441 (7%)	3,784 (19%)	2,886 (15%)	10,002 (50%)	1,713 (9%)
Harrow	11,303 (53%)	1,327 (6%)	1,799 (8%)	5,718 (27%)	1,176 (6%)
Havering	4,723 (19%)	2,597 (11%)	2,441 (10%)	14,615 (59%)	329 (1%)
Hillingdon	10,081 (36%)	2,387 (9%)	3,866 (14%)	9,168 (33%)	2,566 (9%)
Hounslow	9,013 (41%)	1,899 (9%)	2,205 (10%)	6,668 (30%)	2,414 (11%)
Islington	980 (8%)	2,843 (22%)	2,525 (20%)	5,510 (43%)	967 (8%)
Kensington and Chelsea	352 (6%)	940 (15%)	1,280 (21%)	2,533 (41%)	1,042 (17%)
Kingston upon Thames	2,495 (19%)	452 (3%)	1,788 (14%)	7,518 (58%)	802 (6%)

Local authority	Asian	Black	Mixed	White	Any other ethnic group
Lambeth	1,021 (6%)	6,393 (36%)	3,125 (18%)	6,121 (34%)	1,105 (6%)
Lewisham	1,622 (8%)	6,114 (29%)	4,119 (19%)	8,370 (40%)	960 (5%)
Merton	3,701 (23%)	1,669 (11%)	2,218 (14%)	7,738 (49%)	506 (3%)
Newham	17,340 (53%)	5,100 (16%)	2,696 (8%)	5,841 (18%)	1,683 (5%)
Redbridge	15,377 (56%)	2,083 (8%)	2,546 (9%)	7,144 (26%)	448 (2%)
Richmond upon Thames	1,966 (13%)	330 (2%)	2,139 (14%)	10,702 (68%)	525 (3%)
Southwark	1,335 (7%)	6,970 (36%)	3,128 (16%)	6,390 (33%)	1,626 (8%)
Sutton	5,121 (28%)	1,300 (7%)	2,088 (11%)	9,339 (51%)	473 (3%)
Tower Hamlets	15,661 (66%)	1,789 (8%)	2,284 (10%)	3,319 (14%)	724 (3%)
Waltham Forest	5,261 (22%)	3,113 (13%)	3,453 (15%)	10,692 (45%)	1,002 (4%)
Wandsworth	2,937 (17%)	2,964 (17%)	2,954 (17%)	7,994 (45%)	778 (4%)
Westminster	1,161 (15%)	1,124 (15%)	1,100 (15%)	2,176 (29%)	1,981 (26%)

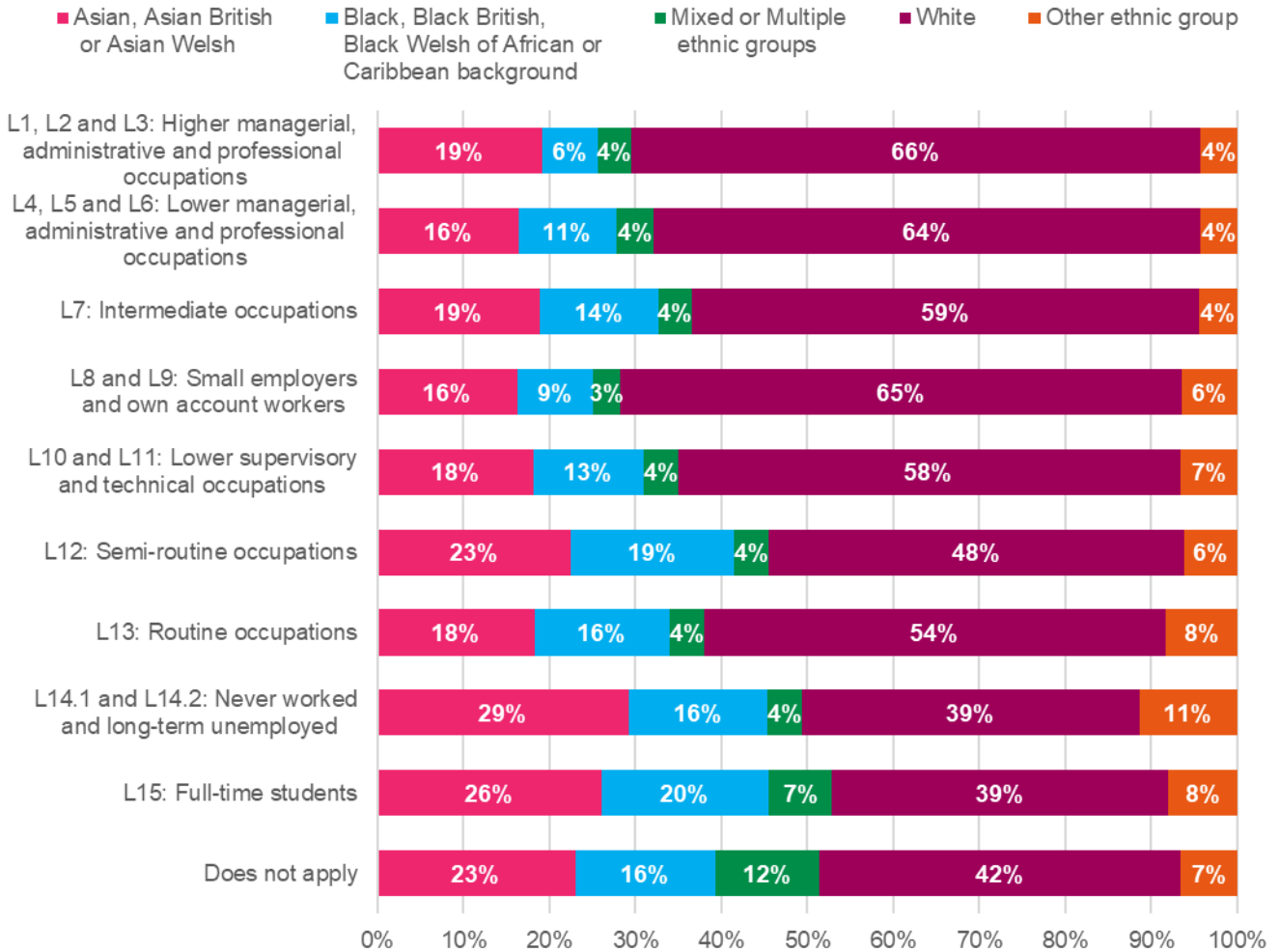
Note: Percentages in brackets refer to the proportion of pupils in state-funded primary schools in given ethnic group within the borough/region. 'Unclassified' ethnicity is excluded from this table, including percentages.

Socio-economic classification by ethnic group

The Office for National Statistics (ONS) provides data on National Statistics Socio-economic Classification (NS-SeC) by Ethnic Group.⁴⁰ The 2021 Census indicates a higher incidence of those in the White ethnic group occupying higher managerial positions. This is followed by Asian/Asian British; and Black/African/Caribbean/Black British.

⁴⁰ ONS, [NS-SeC by ethnic group, by sex, by age, 2021](#)

Figure 4: Socioeconomic Classification (NS-SeC) by ethnicity in London, 2021



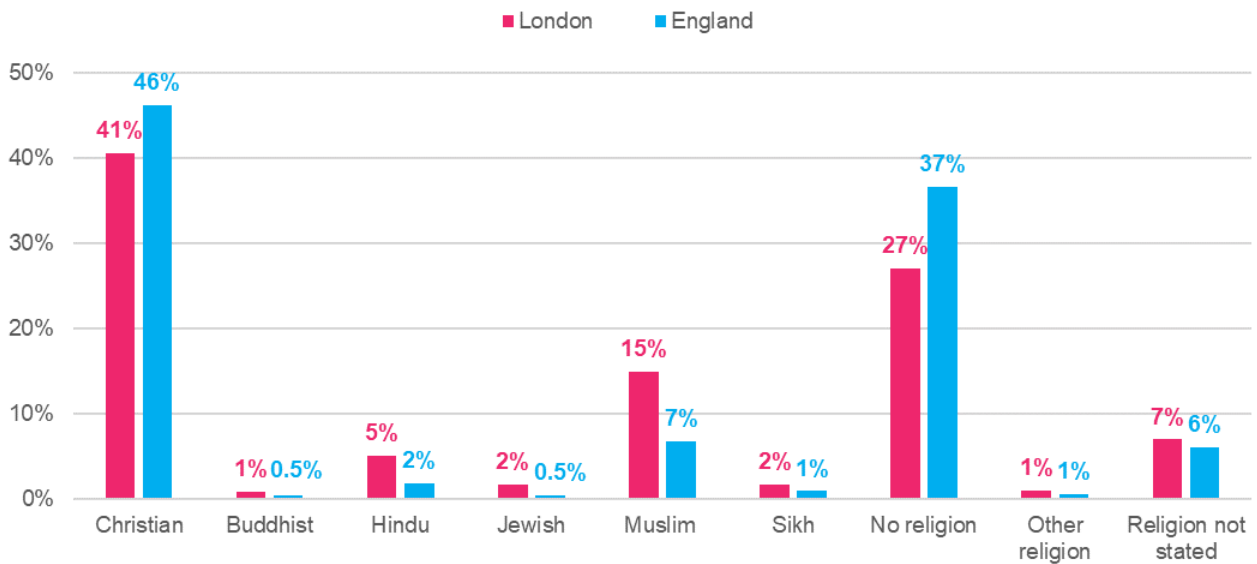
Religion or belief

London’s religious/belief profile

Figure 5 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.⁴¹ In both cases, there are relatively high levels of those who identify as having no religious faith. The percentage of individuals in London identifying as Buddhist, Hindu, Jewish, Muslim, Sikh or ‘Other’ religion is relatively high.

⁴¹ ONS, Religion, 2021

Figure 5: Religion or belief in London and England, 2021



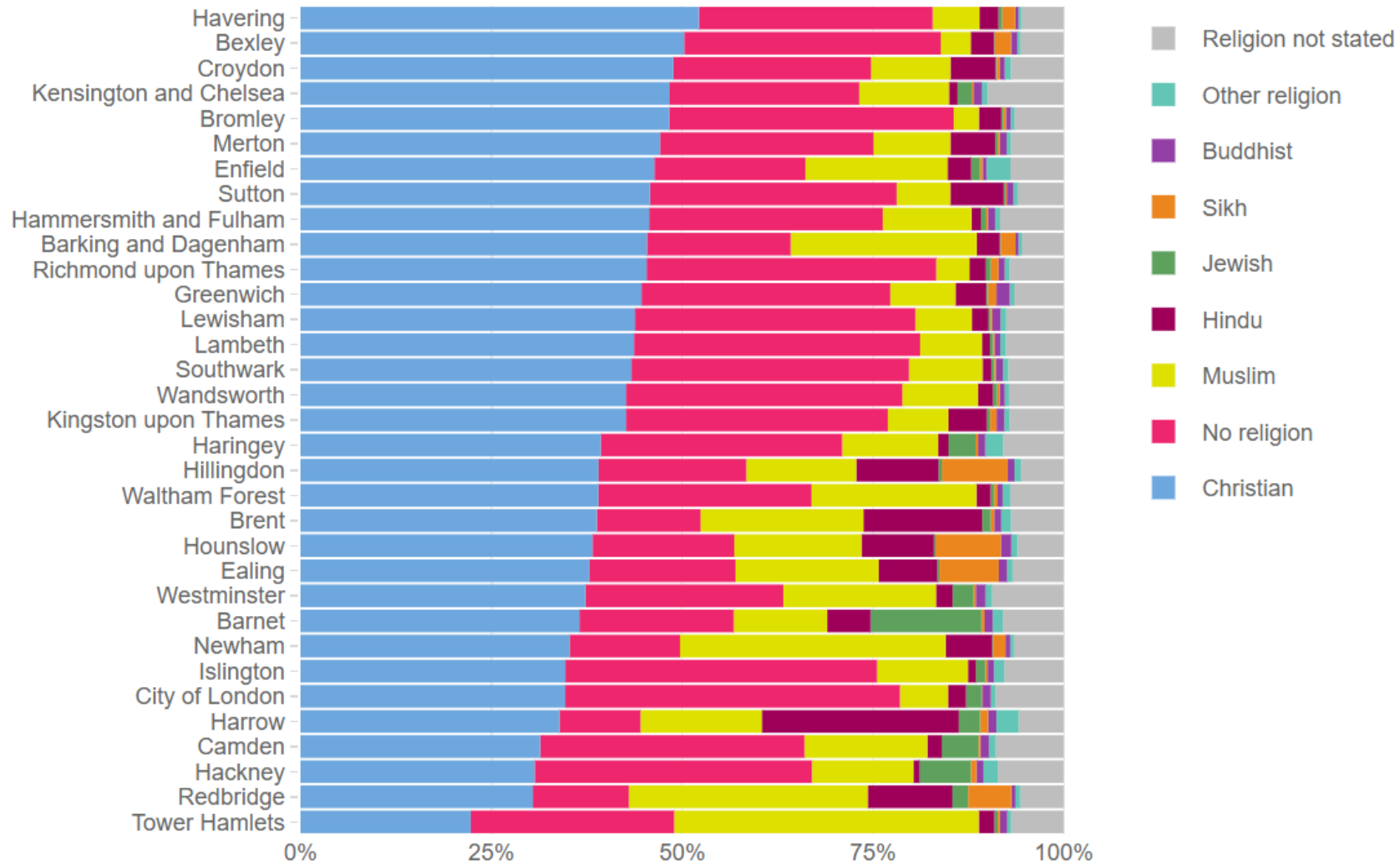
Spatially, the following is seen in London:

- 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
- large Sikh communities in Ealing, Hillingdon and Hounslow.⁴²

These patterns are mapped in Figure 6.

⁴² ONS, [Religion](#), 2021

Figure 6: Major religion categories by London borough (2021)⁴³



⁴³ Census 2021, Figure 5b: Major religion categories by London Borough, 2021

Children's faith

According to Census 2021 data, 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).⁴⁴

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: Religion of children aged 7 to 11 (inclusive) across London, 2021⁴⁵

Local authority	Buddhist	Christian	Hindu	Jewish	Muslim	Sikh	No religion	Other religion	Not answered
London (total)	2,835 (0.5%)	203,595 (37.9%)	28,860 (5.4%)	10,815 (2%)	126,010 (23.4%)	9,045 (1.7%)	115,840 (21.5%)	3,900 (0.7%)	36,670 (6.8%)
Barking and Dagenham	0 (0%)	7,225 (39.4%)	540 (2.9%)	0 (0%)	5,930 (32.3%)	370 (2%)	3,290 (17.9%)	15 (0.1%)	985 (5.4%)
Barnet	205 (0.8%)	8,185 (31.7%)	1,110 (4.3%)	5,185 (20.1%)	4,425 (17.1%)	90 (0.3%)	4,205 (16.3%)	255 (1%)	2,160 (8.4%)
Bexley	110 (0.7%)	7,320 (44.5%)	705 (4.3%)	0 (0%)	980 (6%)	355 (2.2%)	6,015 (36.6%)	20 (0.1%)	935 (5.7%)
Brent	95 (0.5%)	7,205 (35.5%)	2,640 (13%)	210 (1%)	6,965 (34.3%)	60 (0.3%)	1,655 (8.2%)	165 (0.8%)	1,285 (6.3%)

⁴⁴ Census, 2021. Lower tier LAs, Religion (10 categories) and Age (86 categories). Available online at: [Census, 2021](#)

⁴⁵ Note: totals across boroughs may not add up to London total due to rounding.

Local authority	Buddhist	Christian	Hindu	Jewish	Muslim	Sikh	No religion	Other religion	Not answered
Bromley	90 (0.4%)	9,075 (43%)	830 (3.9%)	0 (0%)	940 (4.5%)	65 (0.3%)	8,515 (40.3%)	35 (0.2%)	1,570 (7.4%)
Camden	10 (0.1%)	3,135 (30.9%)	170 (1.7%)	515 (5.1%)	2,935 (28.9%)	0 (0%)	2,455 (24.2%)	55 (0.5%)	880 (8.7%)
City of London and Westminster	40 (0.5%)	2,925 (35.2%)	145 (1.7%)	210 (2.5%)	2,950 (35.5%)	0 (0%)	1,295 (15.6%)	10 (0.1%)	730 (8.8%)
Croydon	85 (0.3%)	11,740 (46.4%)	1,570 (6.2%)	0 (0%)	4,005 (15.8%)	100 (0.4%)	5,920 (23.4%)	110 (0.4%)	1,775 (7%)
Ealing	200 (0.9%)	7,930 (34.2%)	1,760 (7.6%)	30 (0.1%)	6,650 (28.7%)	1,705 (7.4%)	3,305 (14.3%)	100 (0.4%)	1,485 (6.4%)
Enfield	80 (0.3%)	10,000 (42.7%)	580 (2.5%)	125 (0.5%)	6,330 (27%)	85 (0.4%)	3,965 (16.9%)	740 (3.2%)	1,520 (6.5%)
Greenwich	165 (0.9%)	8,465 (45.3%)	780 (4.2%)	0 (0%)	2,510 (13.4%)	160 (0.9%)	5,410 (29%)	60 (0.3%)	1,125 (6%)
Hackney	85 (0.6%)	4,600 (30.4%)	50 (0.3%)	2,040 (13.5%)	2,960 (19.5%)	135 (0.9%)	3,380 (22.3%)	225 (1.5%)	1,670 (11%)
Hammersmith and Fulham	20 (0.2%)	4,400 (48.6%)	85 (0.9%)	65 (0.7%)	1,930 (21.3%)	0 (0%)	1,800 (19.9%)	20 (0.2%)	725 (8%)
Haringey	60 (0.4%)	5,665 (37.7%)	135 (0.9%)	1,110 (7.4%)	2,645 (17.6%)	25 (0.2%)	3,790 (25.2%)	285 (1.9%)	1,315 (8.7%)

Local authority	Buddhist	Christian	Hindu	Jewish	Muslim	Sikh	No religion	Other religion	Not answered
Harrow	120 (0.7%)	4,640 (28.5%)	4,435 (27.2%)	205 (1.3%)	4,130 (25.3%)	160 (1%)	1,220 (7.5%)	385 (2.4%)	1,010 (6.2%)
Havering	50 (0.3%)	7,415 (45.3%)	430 (2.6%)	60 (0.4%)	1,430 (8.7%)	330 (2%)	5,745 (35.1%)	20 (0.1%)	885 (5.4%)
Hillingdon	130 (0.6%)	6,485 (31.8%)	2,445 (12%)	20 (0.1%)	4,660 (22.8%)	1,895 (9.3%)	3,615 (17.7%)	155 (0.8%)	995 (4.9%)
Hounslow	205 (1.1%)	6,665 (34.8%)	1,815 (9.5%)	0 (0%)	4,775 (25%)	1,490 (7.8%)	2,990 (15.6%)	120 (0.6%)	1,075 (5.6%)
Islington	0 (0%)	3,670 (36.5%)	40 (0.4%)	105 (1%)	2,450 (24.3%)	0 (0%)	2,930 (29.1%)	140 (1.4%)	730 (7.3%)
Kensington and Chelsea	0 (0%)	3,235 (50.3%)	55 (0.9%)	150 (2.3%)	1,125 (17.5%)	0 (0%)	1,225 (19%)	20 (0.3%)	625 (9.7%)
Kingston upon Thames	60 (0.6%)	4,285 (40.8%)	550 (5.2%)	0 (0%)	1,190 (11.3%)	95 (0.9%)	3,525 (33.6%)	0 (0%)	785 (7.5%)
Lambeth	30 (0.2%)	7,470 (49.3%)	135 (0.9%)	0 (0%)	2,440 (16.1%)	0 (0%)	3,800 (25.1%)	50 (0.3%)	1,240 (8.2%)
Lewisham	110 (0.6%)	8,100 (44.9%)	480 (2.7%)	10 (0.1%)	2,190 (12.1%)	40 (0.2%)	5,580 (31%)	70 (0.4%)	1,445 (8%)
Merton	80 (0.6%)	6,135 (46.4%)	945 (7.1%)	15 (0.1%)	1,880 (14.2%)	30 (0.2%)	3,180 (24%)	25 (0.2%)	935 (7.1%)

Local authority	Buddhist	Christian	Hindu	Jewish	Muslim	Sikh	No religion	Other religion	Not answered
Newham	75 (0.3%)	6,805 (28.9%)	1,225 (5.2%)	0 (0%)	12,010 (51%)	250 (1.1%)	1,835 (7.8%)	30 (0.1%)	1,305 (5.5%)
Redbridge	85 (0.4%)	5,125 (23.7%)	2,400 (11.1%)	200 (0.9%)	9,490 (43.9%)	1,085 (5%)	1,955 (9%)	130 (0.6%)	1,160 (5.4%)
Richmond upon Thames	35 (0.3%)	6,100 (45.7%)	335 (2.5%)	75 (0.6%)	790 (5.9%)	135 (1%)	4,800 (36%)	60 (0.4%)	1,010 (7.6%)
Southwark	75 (0.5%)	7,700 (48.1%)	115 (0.7%)	0 (0%)	2,785 (17.4%)	0 (0%)	4,240 (26.5%)	25 (0.2%)	1,070 (6.7%)
Sutton	105 (0.7%)	5,825 (39.9%)	1,425 (9.8%)	0 (0%)	1,475 (10.1%)	0 (0%)	4,790 (32.8%)	80 (0.5%)	885 (6.1%)
Tower Hamlets	55 (0.3%)	2,685 (15.1%)	180 (1%)	0 (0%)	12,425 (70.1%)	10 (0.1%)	1,520 (8.6%)	15 (0.1%)	840 (4.7%)
Waltham Forest	95 (0.6%)	6,045 (35.1%)	380 (2.2%)	40 (0.2%)	5,505 (32%)	65 (0.4%)	3,620 (21%)	125 (0.7%)	1,340 (7.8%)
Wandsworth	35 (0.2%)	7,360 (44.8%)	310 (1.9%)	80 (0.5%)	3,120 (19%)	40 (0.2%)	4,255 (25.9%)	40 (0.2%)	1,195 (7.3%)

Note: Percentages in brackets refer to the proportion of residents aged 7-11 who are of specified religion, within the area listed.

Faith schools

Across London in 2024-25, there were 1,778 state-funded primary schools, with a total of 676,691 pupils.⁴⁶

Of these 1,778 schools, 510 are categorised as religious character schools (the remaining 1,268 schools have not indicated religious character, or have indicated this does not apply to them). There are a number of state-funded primary schools of particular religious character, including:

- 470 Christian state-funded primary schools – including Catholic, Roman Catholic, Church of England and Christian (128,651 pupils)
- four Hindu state-funded primary schools (1,698 pupils)
- 27 Jewish state-funded primary schools (7,024 pupils)
- seven Muslim state-funded primary schools (2,840 pupils)
- two Sikh state-funded primary schools (614 pupils).

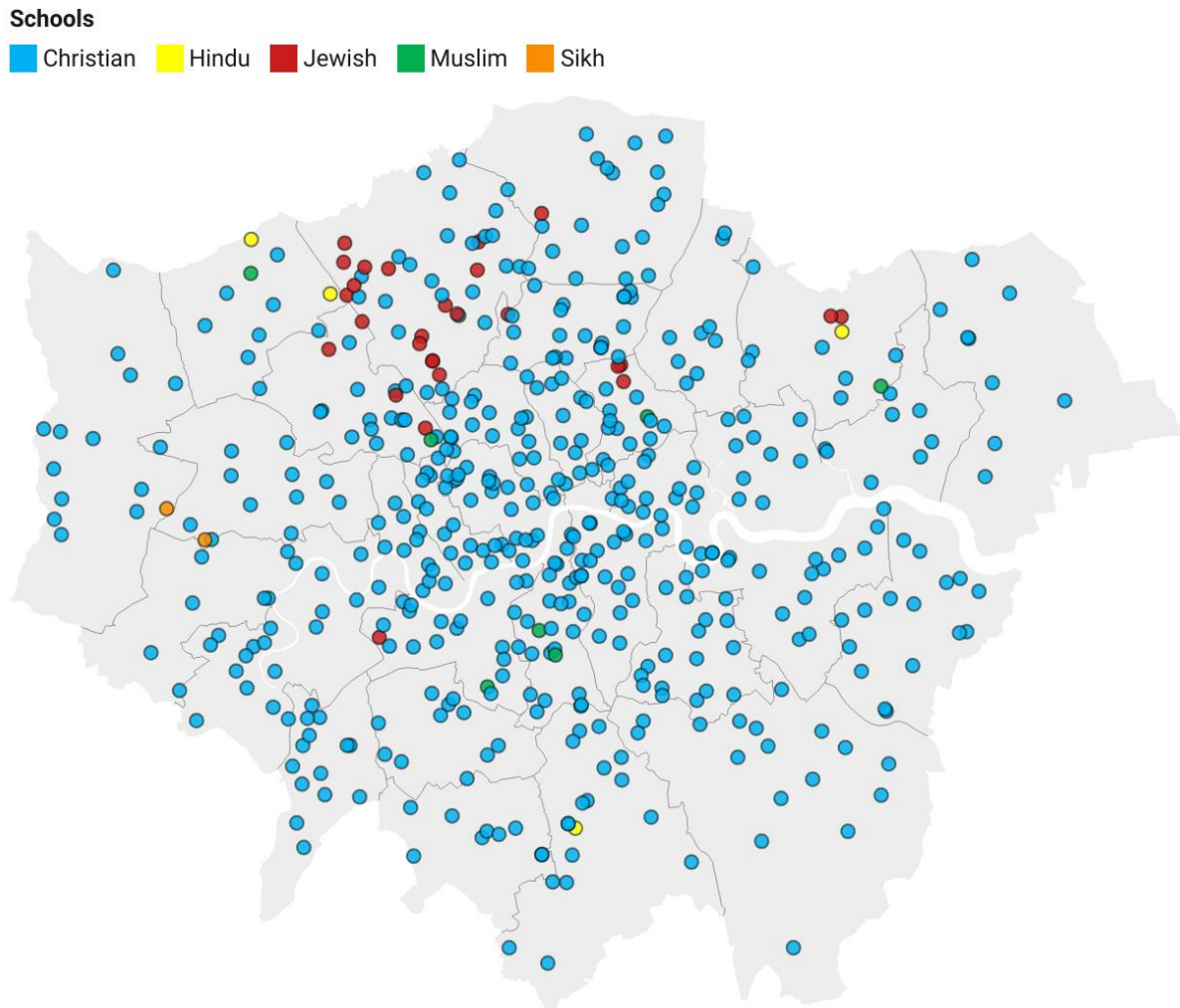
There are 140,827 pupils across these schools – they make up approximately 21 per cent of all state-funded primary school pupils in London.

Spatially, the distribution of schools shown in Figure 7 indicates an approximately even distribution, across London, of Church of England, Catholic, Hindu and Muslim state-funded primary schools.

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

⁴⁶ DfE, [Schools, pupils and their characteristics – academic year 2024/25](#), 5 June 2025

Figure 7: Spatial distribution of religious state-funded primary schools in London by their religious character, 2024-25



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

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.

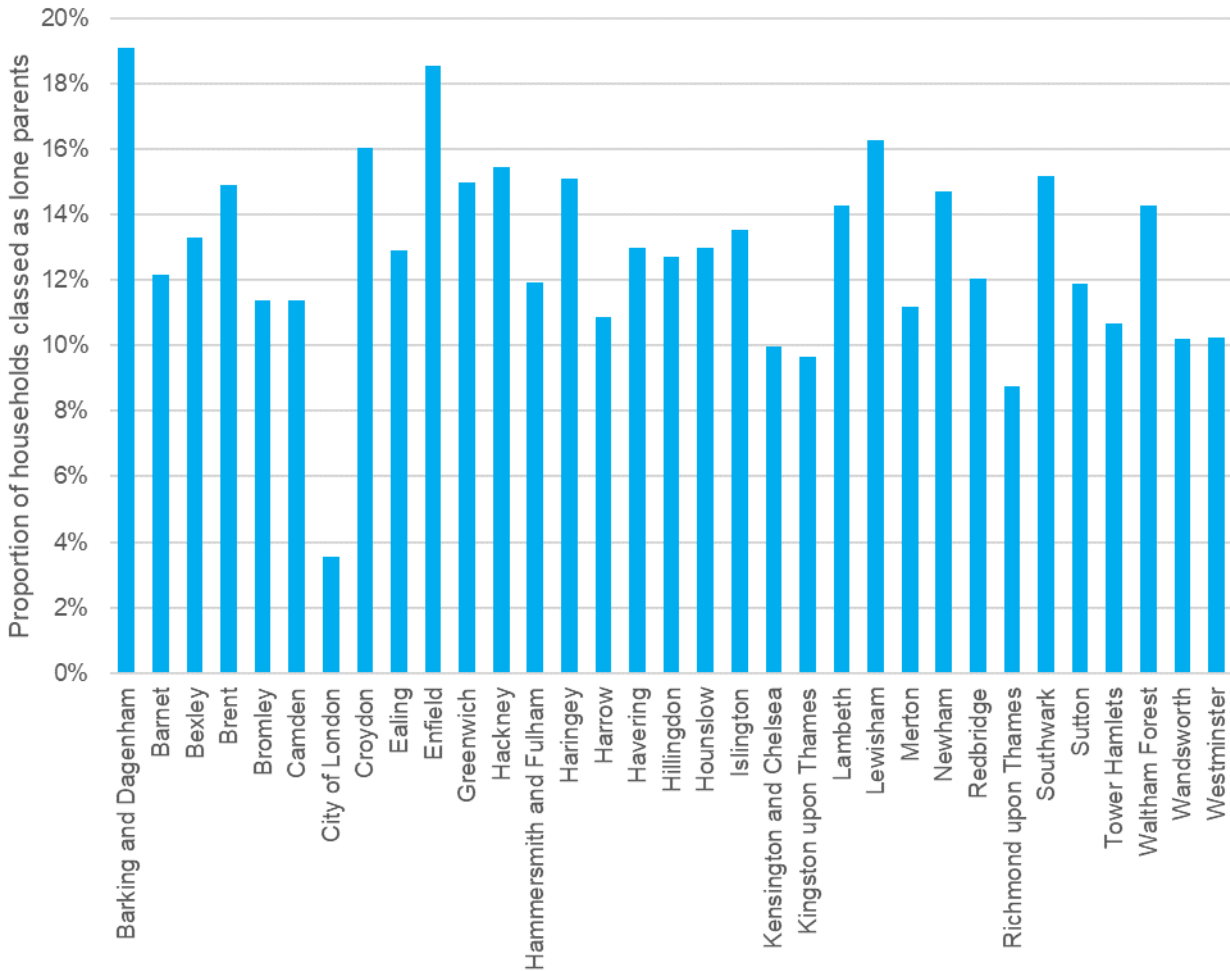
Socio-economic data

Household composition

In London, 13 per cent of households are lone-parent households. This is slightly higher than the England average of 11 per cent.⁴⁷ London's highest proportion of lone-parent households are seen in Barking and Dagenham (19.1 per cent) and Enfield (18.5 per cent). The City of London has the lowest proportion (3.6 per cent) (Figure 8).

⁴⁷ ONS, [Household composition](#), 2021

Figure 8: Proportion of households classed as lone-parent households in London LAs, 2021

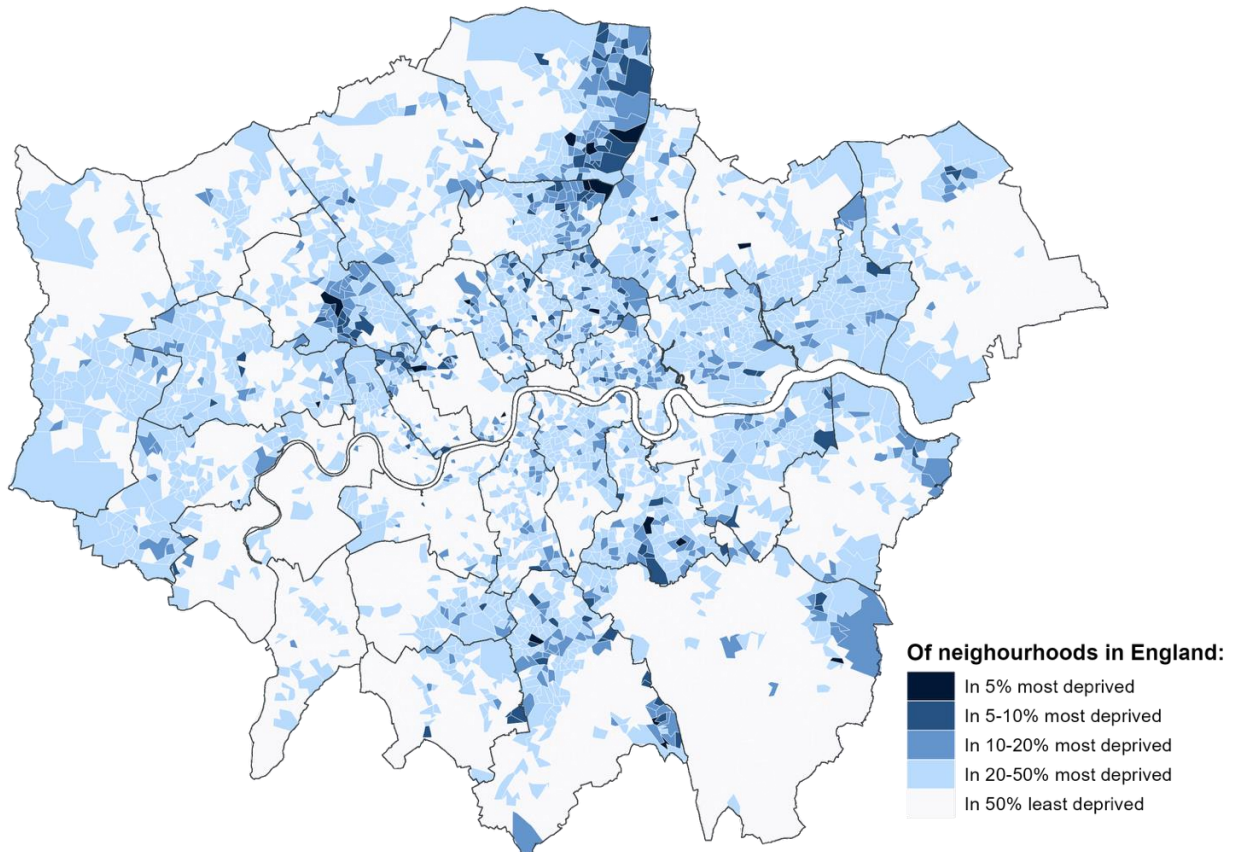


Employment deprivation

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 9. London exhibits relatively low levels of employment deprivation, apart from one hotspot on the eastern side of Enfield.⁴⁸

⁴⁸ MHCLG, [English indices of deprivation 2025](#), October 2025

Figure 9: Employment deprivation in London, 2025

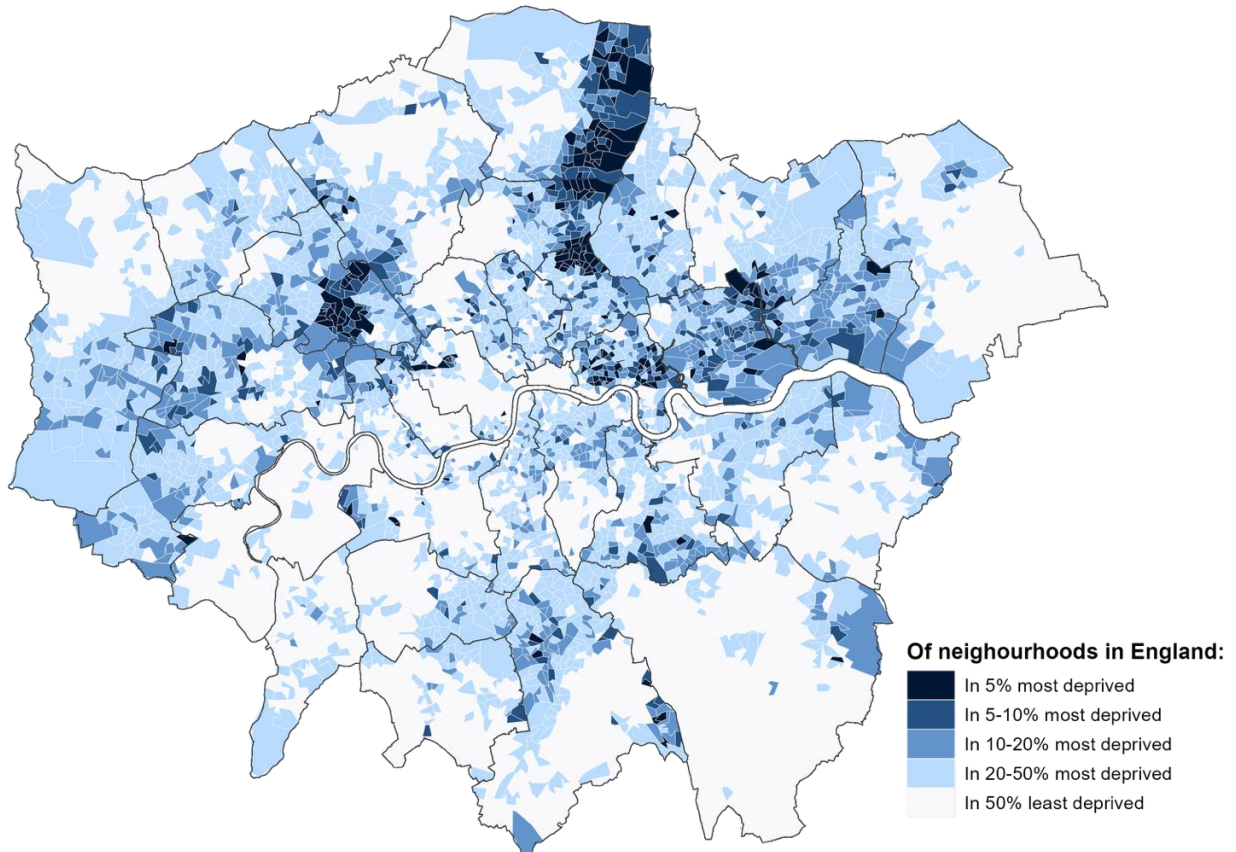


Income deprivation

The IMD income domain measures numbers of people on low incomes, who receive of benefits and tax credits. Relative to IMD overall the experience of Income deprivation in London is markedly more intense in most areas, particularly in Tower Hamlets, where 60 per cent of neighbourhoods in this borough are among the 20 per cent most deprived nationally (Figure 10). This measure of income deprivation directly captures the disproportionate impact of higher housing costs in London.⁴⁹

⁴⁹ MHCLG, [English Indices of Deprivation 2025](#), 30 October 2025

Figure 10: Income deprivation in London, 2025



Children living in low-income households.

In 2023-24, over 300,500 children in London were reported to be living in relative low-income households, equivalent to 17.8 per cent of children. This is four percentage points lower than the England average of 21.8 per cent.⁵⁰ The largest numbers, and highest proportions, of children in relative low-income families are seen in:

- Newham (20,286 and 27 per cent)
- Tower Hamlets (16,591 and 29 per cent)
- Barking and Dagenham (14,788 and 26 per cent).⁵¹

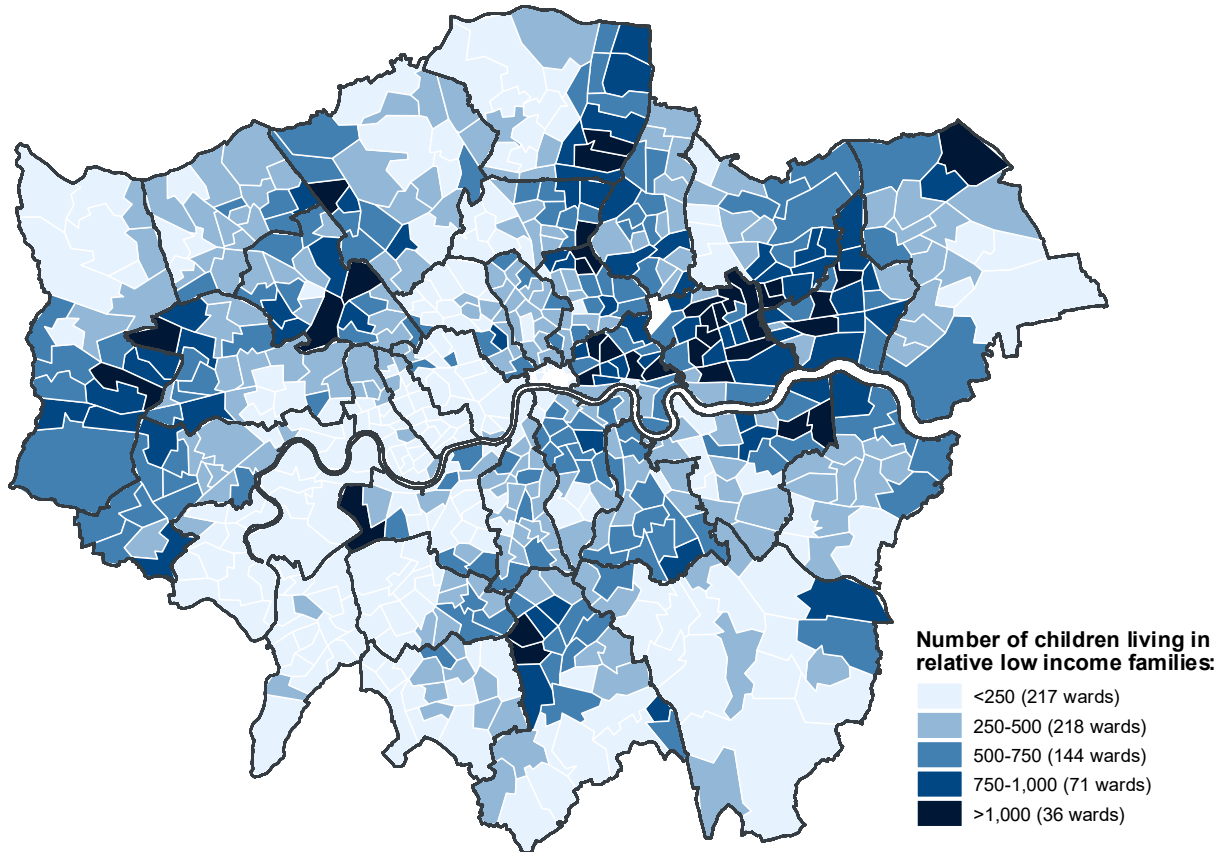
This data has been mapped at a more granular ward level across London in Figure 11.⁵²

⁵⁰ LG Inform, [Proportion of children aged 0-15 in relative low income families in England](#), 30 November 2024

⁵¹ Excluding City of London due to low number of children.

⁵² DWP, [Children in low-income families \(2023-24\)](#)

Figure 11: Number of children in low-income families across London’s wards, 2023-24⁵³



Number of Londoners living below the poverty line

Between in 2021-22 and 2023-24, around 2.36 million Londoners (26 per cent) were in relative poverty, after taking housing costs into account.⁵⁴ This represents a two-percentage point increase on the previous year – meaning that the incomes of a further 160,000 Londoners have fallen below the poverty line in the latest year. The overall London poverty rate of 26 per cent remains higher than that of the UK (21 per cent). The poverty rate in London is also highest for children (35 per cent) compared to other age groups, including working-age Londoners (23 per cent) and pensioners (22 per cent).⁵⁵

⁵³ DWP, [Children in low-income families \(2023-24\)](#)

⁵⁴ GLA London Datastore, [Economic Fairness: Population in Poverty](#), 2025

⁵⁵ GLA London Datastore, [Economic Fairness: Population in Poverty](#), 2025

London Living Wage (LLW)

In April 2024, 13.8 per cent of London employee jobs were paying below the LLW.⁵⁶ The proportion of employees earning less than the LLW varies considerably across the boroughs.

In the following boroughs, more than 20 per cent of employees were earning less than the LLW:

- Barking and Dagenham
- Barnet
- Bexley
- Brent
- Ealing
- Enfield
- Greenwich
- Haringey
- Harrow
- Havering
- Hounslow
- Redbridge
- Sutton
- Waltham Forest.

⁵⁶ Trust for London, [Low-paid jobs in London](#)

In the following boroughs, less than 10 per cent of employees were earning less than the LLW:

- Camden
- City of London
- Islington
- Southwark
- Tower Hamlets.⁵⁷

In October 2025 the London Living Wage increased by 95p per hour – from £13.85 to £14.80. Employers signed up to the scheme are set to implement this change by May 2026.

Benefit cap

DWP data shows that, cumulatively, over 262,000 households in London had their benefits capped between the introduction of the cap (April 2013 for Housing Benefit, and October 2016 for Universal Credit) and May 2025.⁵⁸ This represents 32 per cent of all British households that have had benefits capped, since the cap's introduction. The boroughs with the most capped-benefits households were Enfield (18,712) and Brent (18,323). The fewest were seen in the City of London (106) and Richmond upon Thames (2,812).

The two-child limit on Universal Credit was also scrapped from April 2026.⁵⁹ The government's own modelling analysis estimates that it will result in 450,000 UK children being lifted out of relative poverty (after housing costs) by the final year of this parliament (2029). A GLA tax-and-benefit modelling analysis found that this change would have the following impacts in London:

- increase the mean weekly disposable income of affected households by £49.22 a week
- lift 40,000 children out of relative poverty.⁶⁰

⁵⁷ Trust for London, [Low-paid jobs in London](#)

⁵⁸ DWP, [Benefit cap: number of households capped to May 2025](#), 23 September 2025

⁵⁹ DWP, [Removing the two-child limit on Universal Credit: Impact on low income poverty levels in the United Kingdom](#), 4 December 2025

⁶⁰ DWP, [Universal Credit claimants statistics on the two child limit policy](#), April 2025

Cost of living

According to the Cost-of-Living Tracker, London households with the lowest incomes in June 2025 would see a 33 per cent increase in price, if buying the same goods and services as they did in March 2020.⁶¹ There is also a three-percentage point difference in this increase between the most and least impacted income groups in London.

Outputs from the GLA cost-of-living poll between January 2022 (when the polling started) and July 2025 indicate that, during this time, the number stating that they are ‘financially struggling’ has increased from around 12 per cent to 17 per cent.⁶²

Food security

Between 2021-22 and 2023-24, 10.6 per cent of all households in London experienced food insecurity: a significant increase from the previous year, at 8.6 per cent.

Households with children were more likely to be food insecure, than those without children. Households with three or more children were worst affected, with 26.1 per cent experiencing food insecurity. For one-child households, this figure was 11.4 per cent; for two-children households, it was 11.3 per cent.⁶³

Carers and employment

According to the DWP Family Resources survey 2023-24, 51 per cent of informal carers aged 16 and above in the UK were in employment, compared with 60 per cent of everyone aged 16 and above.⁶⁴ The Joseph Rowntree Foundation’s 2025 Poverty Report estimated that 28 per cent of informal carers are living in relative poverty in 2022-23, compared to 20 per cent of those who are not informal carers.⁶⁵ They also face a reduced ability to work, resulting in a financial penalty – unpaid social carers have an average pay penalty of £414 per month.

School demand and attendance

School places

Demand for places in London’s state-funded schools is expected to drop in coming years. This is in line with forecasts of fewer children living in the city. Most London boroughs expect to see a decline, between 2024-25 and 2027-28, in pupil numbers at Reception age. This period is also expected to see, on average, a 9.6 per cent drop in demand for

⁶¹ Trust for London, [London’s Cost of Living Tracker](#), July 2025

⁶² GLA London Datastore, [GLA cost of living polling](#), 2025

⁶³ Trust for London, [London’s Poverty Profile 2025](#), July 2025

⁶⁴ DWP, [Family Resources Survey: financial year 2023 to 2024](#), January 2026

⁶⁵ Joseph Rowntree Foundation, [UK Poverty 2025](#), January 2025

Reception places across London. The decrease in demand is expected to be larger in Inner London (10.7 per cent) compared to Outer London (9.1 per cent).⁶⁶

Falling school rolls have been increasingly cited as one reason for school closures or mergers in the capital.

School absence and attendance rates

According to 2023-24 data, the overall absence rate in London was 6.4 per cent. The overall rate is lower in state-funded primary schools (7.4 per cent) than state-funded secondary schools (12.7 per cent).⁶⁷ The boroughs with the highest proportions of absence in state-funded primary schools are Westminster (6.3 per cent) and Islington (6.1 per cent). The lowest absence rates are in City of London (4.3 per cent) and Richmond upon Thames (4.5 per cent).

Free school meals

FSM eligibility

According to 2024-25 school year data, 25.4 per cent of London's state-funded primary school pupils were known to be eligible for FSM under the criteria applied at the time.⁶⁸ The English average was 24.7 per cent. The proportion of London state-funded primary school pupils eligible for FSM, at the time, was highest in Camden (44.5 per cent), followed by Islington (44.1 per cent) and Hackney (41.1 per cent). The lowest proportions were seen in Richmond upon Thames (12.3 per cent), Harrow (14.4 per cent) and Bromley (14.5 per cent).

The FSM criteria expansion, from September 2026, will mean that a significantly greater proportion of primary school pupils in London will meet the eligibility for government FSM.

Based on available DWP data, shown in Table 4, we can estimate that, out of a total of around 371,000 current pupils in Year 2-5 in London, approximately 52 per cent (193,000) are in households on Universal Credit. These pupils will therefore meet the new national FSM eligibility criteria from September. 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 state-primary pupils in London will qualify for government FSM once the criteria changes.

⁶⁶ GLA London Datastore, [Sub-regional Pupil Projections](#), September 2025

⁶⁷ DfE, [Pupil absence in schools in England – academic year 2024/25](#), 20 March 2025

⁶⁸ DfE, [Schools, pupils and their characteristics – academic year 2024/25](#), 5 June 2025

Table 4 – Number of pupils in Years 2-5 in Universal Credit (UC) Households, November 2025⁶⁹

Borough	Total pupils in Years 2-5	Pupils in households on UC in Years 2-5	Estimate of non-FSM-eligible pupils in Years 2-5
Barking and Dagenham	13,939	8,340	5,599
Barnet	16,682	7,920	8,762
Bexley	12,207	4,280	7,927
Brent	14,382	9,350	5,032
Bromley	15,612	4,350	11,262
Camden	5,295	3,380	1,915
City of London	118	30	88
Croydon	17,835	9,970	7,865
Ealing	15,952	8,400	7,552
Enfield	15,991	10,370	5,621
Greenwich	13,033	7,160	5,873
Hackney	8,948	8,270	678
Hammersmith and Fulham	4,874	2,890	1,984
Haringey	10,653	6,440	4,213
Harrow	12,373	4,940	7,433
Havering	13,942	5,500	8,442
Hillingdon	15,041	6,480	8,561
Hounslow	12,703	6,970	5,733
Islington	6,735	4,730	2,005

⁶⁹ DWP, [Number of children in UC households, by school year, region and local authority](#), November 2025

Borough	Total pupils in Years 2-5	Pupils in households on UC in Years 2-5	Estimate of non-FSM-eligible pupils in Years 2-5
Kensington and Chelsea	3,491	1,360	2,131
Kingston upon Thames	7,086	2,160	4,926
Lambeth	10,201	5,910	4,291
Lewisham	12,407	6,820	5,587
Merton	8,321	3,390	4,931
Newham	17,538	10,880	6,658
Redbridge	16,561	6,770	9,791
Richmond upon Thames	8,733	1,740	6,993
Southwark	11,084	6,670	4,414
Sutton	10,142	3,490	6,652
Tower Hamlets	12,535	9,840	2,695
Waltham Forest	12,986	6,330	6,656
Wandsworth	9,351	4,850	4,501
Westminster	4,231	2,680	1,551
Total	370,982	192,660	178,322
Percentage of total	-	52%	48%

At present, there is no available data allowing a London-region analysis of the protected characteristics of pupils meeting the expanded criteria. It is therefore not yet possible to fully assess what the expansion will mean for children from different backgrounds or circumstances. However, due to the universal nature of the Mayor's UFSM scheme, we do not anticipate any detrimental equalities implications for the delivery of the Mayor's scheme.

Due to data availability, analysis in this section refers to the pre-September 2026 FSM criteria, unless otherwise stated. A full analysis will be included in future programme

EqIAs. It is expected that the January 2027 School Census (published in June 2027) will be the first to include confirmed totals of eligible pupils under the new eligibility criteria, broken down by protected characteristics.

FSM uptake

According to 2024-25 data, 85 per cent pupils eligible and registered for FSM⁷⁰ in London's state-funded primary schools take government-funded FSM, compared to 81 per cent across England.⁷¹ The proportion of eligible pupils taking FSM is lowest in Sutton (73 per cent) and Merton (32 per cent), and highest in City of London (100 per cent) and Barnet (92 per cent). However, the proportion for the City of London is based on very small pupil numbers (there are only 58 FSM-eligible pupils in state-funded primary schools here).

FSM and ethnicity

According to 2024-25 data, 31 per cent of London's FSM-eligible state-funded primary school pupils identify as White (53,005).⁷² This is followed by pupils identifying as Black (42,882), Asian (30,899), mixed (26,515), and then 'any other ethnic group' (15,116). A further 2 per cent had unclassified ethnicity (3,451).

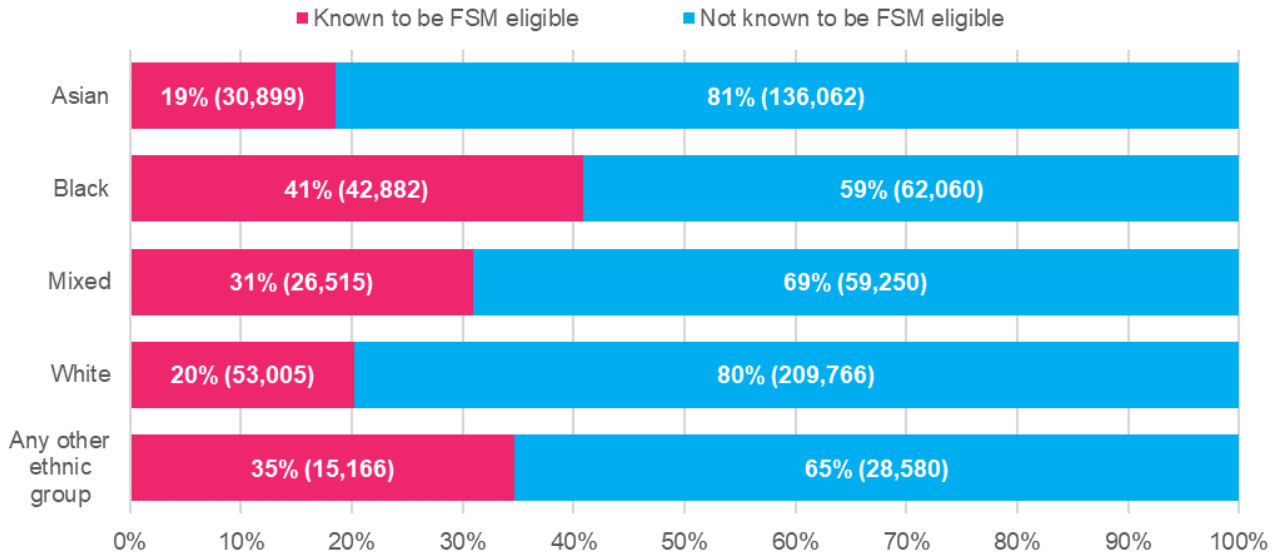
Whilst the majority of state-funded primary school pupils eligible for FSM in London identify as White, 41 per cent of pupils who identify as Black are eligible for FSM in these schools (see Figure 12); this is the highest proportion of any ethnic group. This is followed by pupils identifying as 'any other ethnic group' (35 per cent of pupils from this group are eligible for FSM), mixed (31 per cent), White (20 per cent) and Asian (18 per cent).

⁷⁰ Income-related, government-funded FSM.

⁷¹ DfE, [Schools, pupils and their characteristics – academic year 2024/25](#), 5 June 2025

⁷² DfE, [Schools, pupils and their characteristics – academic year 2024/25](#), 5 June 2025

Figure 12: FSM eligibility by ethnicity in state-funded primary schools in London, 2024-25



Note the number in brackets refers to the number of pupils. Excludes those with ‘unclassified’ ethnicity.

FSM and educational attainment

London schools record higher GCSE scores than those from any other region in England.⁷³ 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.

In 2024-25, pupils eligible for FSM (under previous eligibility criteria) in England achieved an average score of 35.0, compared to 49.8 for non-eligible pupils. In London, pupils eligible for FSM achieved an average score of 41.9, compared to 54.3 for non-eligible pupils. Queen Mary University of London research recently found positive impacts on reading and maths, in boroughs with the longest-running UFSM schemes (seven years or more).⁷⁴

⁷³ DfE, [Key stage 4 performance, academic year 2024/2025](#), April 2026

⁷⁴ Queen Mary, University of London, [The effects of Universal Free School Meals on primary school attendance and educational attainment](#), August 2025

Independent schools

Independent and private schools charge fees to attend, instead of being funded by the government. Pupils do not have to follow the national curriculum.

In 2024-25 there were 50,074 pupils, aged 7-11, studying at independent schools in London.⁷⁵

Further information on the scheme's approach to independent schools can be found in supplementary analysis on London's school sector.⁷⁶

⁷⁵ DfE, [Schools, pupils and their characteristics – academic year 2024/25](#), 5 June 2025

⁷⁶ GLA, [Supplementary analysis on London school sector](#), June 2026

4. Consultation and engagement

Stakeholder engagement is a key part of an Integrated Impact Assessment (IIA) methodology, and of policymaking more generally within the GLA. Stakeholders' views have informed the IIA's scope; and the interim and final assessments comprising the IIA.

See annex three for detail on engagement conducted before the September 2023 launch, and during the policy's first two years; and ongoing engagement.

Ongoing engagement for the 2026-27 school year

The GLA is maintaining ongoing engagement with boroughs and schools; and a range of consultation and intelligence-gathering activities, including insight and evaluation. This is supported by knowledge-sharing channels such as webinars, web resources, school visits and bulletins.

Engaging London boroughs ahead of FSM criteria expansion

In autumn 2025, the GLA's termly borough survey also sought views on the potential equalities implications of the government's proposed expansion of FSM eligibility. Boroughs were asked whether the change could affect delivery or uptake for pupils with protected characteristics; or if it could have other equalities impacts. Twenty-four boroughs responded.

Overall, most boroughs anticipated either a positive impact or no material change. Potential benefits identified included increased uptake; reduced stigma associated with FSM eligibility; and wider access for lower-income families. Several boroughs highlighted the potential for more inclusive provision, including benefits for pupils with SEND and those with specific dietary requirements.

Boroughs generally expected limited impact in primary schools, where universal provision is already in place; and a greater impact in secondary schools, where eligibility expansion may significantly increase participation. While most responses were positive, some boroughs noted potential delivery pressures associated with increased uptake (including capacity, resourcing and funding considerations), which could indirectly affect the ability to meet diverse needs.

More relevant to the Mayor's scheme, boroughs highlighted the importance of having robust FSM registration processes in place, so that eligible pupils continue to be identified and schools can access associated PP and Ever6 funding. Concerns were raised that changes to eligibility could delay access to FSM-related benefits, or affect PP funding, if

registration is not maintained. Some boroughs noted that this risk may disproportionately affect families with protected characteristics – including single-parent households; families with disabled parents or carers; and families where English is not the first language.

The borough survey was conducted nearly one year before the expanded criteria took effect, with many unknowns at play. A small number of boroughs indicated that it was too early to assess the equalities impact; and said they needed further information on eligibility data, and the government's own EqIA, before reaching a firm conclusion. We await further guidance from DfE – we will then help cascade this to London boroughs and schools. In the meantime, we will continue to engage with boroughs ahead of the change.

5. Assessment

A qualitative assessment has been undertaken of potential disproportionate and differential effects, both positive and negative, that could result from continuing to implement and deliver the 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	Positive impacts on children aged 7-11, who will continue to benefit from UFSM; 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 the lowest-income households, who may have missed out	Lack of evidence on impact on other children living in the household. Potential for further research, once the government's expansion to families on Universal Credit takes place.	The Education Endowment Foundation (EEF) evaluation of year one of the scheme found that older pupils have lower uptake of the meals than younger pupils. ⁷⁸ This finding is reflected in the Arbor data. ⁷⁹ It also found that 10 months after introducing the policy, in London boroughs that gained access to UFSM, pupils made no measurable additional progress in their KS2 tests, on average, when	There will be continued engagement to raise awareness of the benefits of universal registration – not only on primary pupils, but on other age groups and their families. This is in case of any negative implications on the delivery of the Mayor's scheme;

⁷⁸ EEF, [Universal Primary Free School Meals in London: Interim report](#), December 2025

⁷⁹ GLA London Datastore, [Arbor meals data - London Datastore](#), May 2026

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	<p>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> <p>There are 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>compared to a group of similar pupils for whom access to FSM did not change.</p> <p>These interim findings cover the 10 months after the policy was introduced. No measurable impact on attainment would be expected in such a short timeframe. A final report, to be published in 2026, will provide a fuller picture of the Mayor’s UFSM impact over its first two years.</p> <p>Queen Mary University of London’s evaluation of UFSM schemes looked at impacts on education attainment and school absence amongst primary school pupils.⁸⁰ This study examined four London boroughs – Newham, Islington, Southwark, and Tower Hamlets – that introduced UFSM between 2009 and 2015. It found that, during the first six years of UFSM in these boroughs, there were no statistically significant improvements in reading or</p>	<p>however, these are not expected.</p>

⁸⁰ Queen Mary, University of London, [The effects of Universal Free School Meals on primary school attendance and educational attainment](#), August 2025

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	<p>Non-FSM-eligible households with a greater number of children may see particular financial benefit, as they no longer have to fund multiple meals each day.</p> <p>London boroughs who already provided UFSM to all primary school children, before the Mayor’s scheme was introduced, will continue to receive UFSM funding. This will allow them to reinvest into areas that will benefit families most in need – for example, funding 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>Once the government’s expanded FSM criteria is implemented, in September 2026, we can</p>		<p>mathematics attainment; nor reductions in school absence. However, boroughs with schemes running for seven or more years demonstrated measurable improvements in reading and mathematics scores. This suggests that educational benefits accrue over time, rather than immediately. These results indicate that short-term pilots, such as the current London UFSM scheme, are unlikely to deliver measurable attainment gains.</p>	

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	<p>expect that significantly more secondary school pupils will be eligible for FSM. The Mayor’s universal primary scheme, combined with the government’s expansion, means that fewer pupils will have to transition away from being able to receive free meals as they move into secondary education. This will benefit pupils and family finances.</p> <p>The Arbor data shows that uptake decreases in higher year groups: 94.5 per cent of Year 3 pupils eligible for the Mayor’s scheme took UFSM; this dropped to 93.4 per cent for Year 4 pupils, 92.1 per cent for Year 5 and 91.2 per cent for Year 6.⁷⁷</p>			
<p>Disability A person is</p>	<p>Across London there are 160 state-funded SEND</p>	<p>N/A</p>	<p>Under the Mayor’s scheme, UFSM is available to children in</p>	<p>Continue to closely monitor any</p>

⁷⁷ GLA London Datastore, [Arbor meals data - London Datastore](#), May 2026

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
<p>disabled if they have a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. The definition includes: sensory impairments; impairments with fluctuating or recurring effects; progressive, organ-specific conditions; developmental and learning difficulties; mental health conditions and</p>	<p>schools (see section 3.3.1).⁸¹</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</p>		<p>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>Since the start of his UFSM scheme, the Mayor has offered top-up funding to special schools who have extraordinary costs associated with providing appropriate meals for SEND pupils. Schools that have applied for the top-up have stated the extra funds will help keep meals inclusive, nutritious, and sustainable – covering rising costs while supporting pupils’ health, wellbeing, and equal access.</p> <p>From September 2026, we can estimate that the Mayor will fund fewer meals as more pupils become eligible for government</p>	<p>implementation issues for SEND schools.</p> <p>Once data becomes available, conduct new analysis to understand FSM eligibility of London’s primary SEND pupils under the expanded national FSM criteria.</p>

⁸¹ DfE, [Special education needs in England, academic year 2023/24](#), 20 June 2024

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
<p>mental illnesses, produced by injury to the body or brain.</p> <p>Persons with cancer, multiple sclerosis or HIV infection are deemed to be disabled persons from the point of diagnosis.</p>	<p>risen even more starkly: in January 2024 there were 90,000 such pupils, 57 per cent up from January 2019.⁸²</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 SEND, 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 NMSS in London – 31 pupils at these schools</p>		<p>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</p>	

⁸² Mime Consulting for London Councils, [Inclusion in London’s Schools](#), November 2024

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	<p>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 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).⁸³</p> <p>A report by the DWP found that people living in</p>		<p>of purchasing vouchers for these families, to ensure they do not miss out.</p> <p>An increasing number of pupils with EHCPs are attending independent special schools, funded by LAs, due to a lack of capacity in the state system. This can lead to these pupils losing their eligibility for the Mayor’s UFSM.</p> <p>London Councils research 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.⁸⁷</p> <p>The IoUH evaluated year one of the Mayor’s UFSM scheme; and found that the school food system has often struggled to meet the requirements of children with SEND.⁸⁸ These challenges predated the introduction of the policy; but could, in some cases, be heightened by it. The evaluation</p>	

⁸³ Avon and Wiltshire Mental Health Partnership, [Avoidant restrictive food intake disorder \(ARFID\)](#), January 2022

⁸⁷ Mime Consulting for London Councils, [Inclusion in London’s Schools](#), November 2024

⁸⁸ IoUH, [More than a meal: An independent evaluation of universal primary free school meals for children in London](#), November 2024

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	<p>families with disabled children were more than twice as likely to be living in poverty than those where no one had a disability.⁸⁴</p> <p>Data from Arbor, collected by the GLA from schools, suggests that take-up was similar between pupils with SEND (91.8 per cent) and pupils without SEND (93.1 per cent).⁸⁵</p> <p>As well as 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 with an EHCP who need</p>		<p>made the following findings:</p> <ul style="list-style-type: none"> • In some schools, staff working with pupils with SEND told evaluators about specific needs and requirements that, when not met, can create anxieties or concerns for their pupils. • Some parents of children with SEND also felt that, since the policy’s introduction, their children’s dietary needs were not being met. • Parents of children with SEND across mainstream and special schools were grateful for the financial help provided by the UFSM policy. 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 opportunities to try new foods 	

⁸⁴ DWP, [Below Average Resources: developing a new poverty measure](#), January 2024

⁸⁵ GLA London Datastore, [Arbor meals data - London Datastore](#), May 2026

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	<p>assistance with eating and special diets should have this covered within the health part of their EHCP.</p> <p>An Adapt-Ed study funded by the National Institute of Health and Care Research (NIHR) and led by the University of Hertfordshire looked at improving school food for children with SEND.⁸⁶</p> <p>This highlighted that state-funded special schools are facing extra pressures in providing appropriate, safe and nutritious food for their pupils, often at a much higher price per meal.</p> <p>The study recommends a review of school food funding allocations for children with SEND –</p>		<p>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> <p>The EEF evaluation found that schools ‘on the whole’ were focused on ensuring that pupils with SEND could receive their FSM. However, it did note that uptake was lower amongst this group.⁸⁹</p> <p>When asked to rate their school’s lunchtime support for children with SEND/sensory processing needs:</p> <ul style="list-style-type: none"> • 49 per cent of respondents said it was ‘very good’ • 33 per cent said ‘good’ • 12 per cent said ‘okay’ • 5 per cent said ‘could be better’ • 0.5 per cent said ‘bad’ 	

⁸⁶ NIHR, [Adapt-Ed: co-designing adaptations to a whole school intervention to improve the uptake and impact of food provision in special schools](#), accessed April 2026

⁸⁹ EEF, [Universal Primary Free School Meals in London: Interim report](#), December 2025

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	especially those in specialist settings.		<ul style="list-style-type: none"> • 1 per cent did not know. <p>The report found that the UFSM policy has helped support pupils with SEND who had previously struggled to access meals, and brought in packed lunches. These students benefitted from the increased sense of inclusion that the policy created.</p>	
Pregnancy and maternity Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.	N/A	N/A	No impacts identified.	N/A
Race This includes ethnic or national origins, colour, or nationality; and	London is more ethnically diverse than England. In London, 54 per cent of individuals identify as White – this	Data on UFSM uptake by ethnic group is currently limited. The GLA monitors uptake via mixed methods.	Findings from IoUH and GLA monitoring suggest White pupils have lower uptake than any other ethnic group. ⁹⁰ The process under the national FSM scheme	Continuing to monitor uptake of UFSM by ethnic group will provide useful information

⁹⁰ IoUH, [More than a meal: An independent evaluation of universal primary free school meals for children in London](#), November 2024

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
<p>includes refugees and migrants, and Gypsies and Travellers.</p> <p>“Refugees and migrants” means people whose intention is to stay in the UK for at least 12 months (excluding visitors, short-term students or tourists). This definition includes asylum seekers; voluntary and involuntary migrants; people who are undocumented; and the children of migrants, even if they were born in the UK.</p>	<p>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 4.4.1).</p> <p>According to data from the 2024-25 school year, the majority of state-funded primary school pupils (all years, excluding ‘unclassified’) in London identify as White (40 per cent); followed by Asian (25 per cent); Black (16 per cent); mixed (13 per cent); and then ‘any other ethnic group’ (7 per cent) (see section 4.4.2).</p> <p>Whilst the majority of</p>	<p>There is no available data on pupils who are currently eligible for FSM, but not registered.</p>	<p>means parents have to formally apply to their LA, or via their child’s academy school, to claim 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.</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>A scheme to make FSM available to these families was introduced during COVID-19, and permanently extended to all households with NRPF in January 2023.⁹¹ However, an application form still needs to be completed for this. UFSM continues to ensure that families amongst the poorest households, and</p>	<p>for any future policy intervention of this nature.</p> <p>Once data becomes available, explore ways to analyse the impact of new criteria on ethnic groups, once the government expansion takes effect.</p> <p>Continue to ask boroughs to use FSM Universal Registration approaches – such as auto-enrolment.</p> <p>Continue to closely monitor uptake of national funding and PP.</p>

⁹¹ DfE, [Guidance: Providing free school meals to families with no recourse to public funds \(NRPF\)](#), October 2024

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	<p>pupils eligible for FSM in London identify as White, 41 per cent of pupils who identify as Black are eligible for FSM in these schools. This is the highest proportion of any ethnic group. This is followed by pupils identifying as ‘any other ethnic group’ (35 per cent of pupils from this group are eligible for FSM), mixed (31 per cent), White (20 per cent) and Asian (18 per cent). See section 4.8.3)</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. This may change once the FSM eligibility criteria expands.</p>		<p>generally higher levels of ethnic minority groups, would automatically benefit from FSM.</p> <p>The Mayor’s scheme means all primary children are provided with FSM – regardless of whether or not they are eligible for, and have registered for, government FSM.</p> <p>The Mayor has also supported London boroughs to implement FSM universal registration processes. This reduces the administrative burden on families when it comes to registering FSM-eligible pupils.</p> <p>One condition 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</p>	

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
			<p>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. With regard to children not regularly eating school lunches, 52 per cent of parents 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 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</p>	

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
			<p>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>The Arbor data on FSM uptake after two years of programme delivery shows the following:⁹²</p> <ul style="list-style-type: none"> • Uptake increased for all year groups. However, uptake is highest in Year 3, with a downward trend to year 6. • Pupils with SEND have lower uptake than pupils without SEND. However, this difference was minimal in the second year of UFSM. Uptake increased amongst pupils with SEND from 2023-24 to 2024-25. • Uptake has increased for ethnic groups since from 2023-24 to 2024-25. It is consistently high for Chinese pupils; followed by ‘mixed other’; and Black pupils. White pupils 	

⁹² GLA London Datastore, [Arbor meals data - London Datastore](#), May 2026

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
			<p>continue to have the lowest uptake; but this is still high (91 per cent) after two years of UFSM.</p> <ul style="list-style-type: none"> • Uptake increased for all religious groups. Uptake was highest for Jewish pupils, followed by Muslim pupils; but this was based on small sample sizes so caution should be exercised when interpreting trends for these pupils. • Uptake has increased for both males and females from 2023/24 to 2024/25. 	
<p>Religion or belief</p> <p>“Religion” includes any religion with a clear structure and belief system.</p> <p>“Belief” means any religious or philosophical</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</p>	<p>Data is lacking on primary school pupil numbers by faith, outside of faith-based state-funded schools.</p> <p>Data on UFSM uptake by faith group is currently limited (including for London boroughs that</p>	<p>UFSM applies to all state-funded primary schools, special schools and pupil referral units. This includes maintained, academy, free and faith schools. Engagement with boroughs indicates halal provision generally does not create additional costs – though this varies with school size, and the proportion of Muslim pupils. Most schools offer vegetarian options or ensure all</p>	<p>Continue to fund kosher food in Jewish state-funded schools at a higher rate.</p> <p>Ensure that the monitoring and evaluation strategy includes monitoring the number of children, from</p>

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
<p>belief. The Equality Act also covers lack of religion or belief.</p> <p>See also GLA supplementary analysis to this EqIA.⁹³</p>	<p>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 4.5.2).</p> <p>Across London, there are 470 Christian schools (including Catholic, Church of England and Christian), four Hindu schools, 27 Jewish schools, seven Muslim schools and two Sikh schools. There are, in total, 140,827 pupils in these schools. This is approximately 21 per cent of all primary school pupils in London (see section 4.5.3).</p> <p>Spatially, the distribution of schools shown in Figure 7 indicates an even distribution of</p>	<p>previously implemented a UFSM 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 dataset exists on the cost of meals that cater to those with religious requirements. However, 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>meat is halal, meeting the needs of many Muslim, Buddhist and Hindu pupils. School Food Standards requiring non-dairy protein on multiple days also help accommodate pupils who require vegan diets.</p> <p>IoUH’s year-one evaluation found schools were aware that pupils with faith-based diets risked missing out on FSM and UFSM; however, most already provided some accommodation.⁹⁷ However, some pupils (especially where they are in the minority) still face more limited options, restricting full participation. These issues largely predate UFSM. and highlight the need for a whole-system approach.</p> <p>Key findings:</p> <ul style="list-style-type: none"> • Almost all London schools offered halal food in 2022-23 (95 per cent), increasing to 97 per cent in 2023-24. 	<p>different faith groups, taking up UFSM.</p> <p>Update the programme’s grant conditions for the academic year 2027-28 to require all boroughs and schools to follow the government’s new school food standards.</p> <p>Continue to understand the nuances and intersectionalities between protected characteristics; and the impact this could have on their experience of receiving FSM (not just take-up figures).</p>

⁹³ GLA, Supplementary analysis on London school sector, June 2026

⁹⁷ IoUH, [More than a meal: An independent evaluation of universal primary free school meals for children in London](#), November 2024

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	<p>Church of England, Catholic, Hindu and Islamic state-funded primary schools across London.</p> <p>Jewish schools are concentrated in north-west London, particularly Barnet and Brent. Sikh schools are concentrated in west London, particularly Ealing and Hillingdon.⁹⁴</p> <p>Different religious/faith groups have specific dietary requirements (see section 4.5.4 for further details).</p> <p>For the 2024-25 academic year, there were 70 registered independent faith-based schools in London. These schools had 10,593 pupils aged 7-11. The</p>		<p>Approaches include halal/non-halal meat, vegetarian defaults, or pescatarian options. Some families found vegetarian defaults repetitive.</p> <ul style="list-style-type: none"> Sikh pupils, many of whom avoid halal/kosher meat, may not be fully catered for where halal is the predominant option. Some Hindu pupils also avoid certain foods on certain days. A minority of families opt out as a result. <p>Arbor data and GLA parent surveys suggest these issues did not significantly reduce overall take-up.⁹⁸</p> <p>EEF found strong engagement from pupils with religious dietary needs.⁹⁹ Many schools with large Muslim populations provide halal or mixed options. However, in some settings, halal is the only meat available – leading to</p>	

⁹⁴ DfE, [Get Information about Schools](#), accessed 2026

⁹⁸ GLA London Datastore, [Arbor meals data - London Datastore](#), May 2026

⁹⁹ EEF, [Universal Primary Free School Meals in London: Interim report](#), December 2025

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	<p>most common type of independent school with a religious denomination was Church of England (17); a further 30 schools declared that they were of another Christian faith.</p> <p>Twelve independent schools with pupils aged 7-11 were Jewish, or said they were of another Jewish faith. These contained 2,140 pupils – or 4 per cent of the total population of pupils in independent schools in the 7-11 age range.</p> <p>A further 11 schools classified themselves as Muslim. These contained 459 pupils – or 1 per cent of the total population of pupils in independent schools in the 7-11 age range.</p> <p>Current school food</p>		<p>objections from some parents on welfare grounds, and prompting some Muslim pupils to choose vegetarian/vegan meals instead. Around 73 per cent of surveyed schools monitored cultural appropriateness of meals; 19 per cent did not (8 per cent did not know). Some families still prefer home-cooked food, as school versions differ from cultural norms.</p> <p>In year three, the GLA commissioned further research into improving provision for pupils requiring halal food. Many schools have workable approaches, but challenges remain; financial and practical pressures; inconsistent data; staff awareness gaps; and concerns about certification or kitchen practices. These issues affect families' confidence and can lead them to choose vegetarian or packed lunches.</p> <p>As set out in the GLA Independent Schools Analysis, the Mayor considered whether UFSM should extend to independent faith</p>	

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	<p>standards⁹⁵ state that ‘for vegetarians, a portion of non-dairy protein on three or more days each week’ should be provided. The government’s proposed updated school food standards limit the serving of processed meats and the frequency with which cheese is served as a main ingredient.⁹⁶ They also stipulate that on at least three days a week, vegetarian meals must use pulses as the protein source.</p> <p>A 2020 landmark legal case ruled that ethical veganism is a philosophical belief under the Equality Act.</p>		<p>schools, including those serving Charedi and Muslim communities.¹⁰⁰ Evidence shows some families in these settings face financial hardship, larger-than-average households, and reliance on benefits. Further details are in the supplementary analysis.¹⁰¹</p>	

⁹⁵ DfE, [School food standards practical guide](#), November 2025

⁹⁶ DfE, [School Food Standards: updating the legislative framework](#), April 2026

¹⁰⁰ GLA, [Supplementary analysis on London school sector](#), June 2026

¹⁰¹ GLA, [Supplementary analysis on London school sector](#), June 2026

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
<p>Sex</p> <p>Both men and women are covered under the Equality Act.</p>	<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>In 2022-23, single adults with children had the highest poverty rate among adults: 47 per cent were living in poverty in London, compared to 44 per cent in the rest of England.¹⁰² In 2022, out of the 2.9 million lone-parent families in the UK, 2.5 million (84 per cent) were headed by a lone mother.¹⁰³</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>	<p>N/A</p>
<p>Sexual orientation</p> <p>The Equality Act protects all sexual orientations</p>	<p>Research conducted by YouGov in 2019 revealed that, on average, lesbian, gay, bisexual, transgender, queer and other LGBTQ+</p>	<p>N/A</p>	<p>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.</p>	<p>N/A</p>

¹⁰² Trust for London, [Poverty by demographics: Proportion of households in poverty by family type](#), May 2025

¹⁰³ ONS, [Families and households in the UK: 2023](#), May 2024

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
(including lesbian, gay, bisexual, and heterosexual people).	<p>employees earn 16 per cent less than heterosexual workers.¹⁰⁴ 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>			
<p>Marriage and civil partnership</p> <p>This relates only to the need to</p>	N/A	N/A	This characteristic is not applicable as, under the Equality Act, marriage and civil partnership is considered a protected characteristic only in relation to discrimination in the workplace. It	N/A

¹⁰⁴ Sphere, [Heterosexual and LGBTQ+ pay gap higher than UKs gender pay gap](#), July 2019

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
eliminate discrimination.			is therefore outside the scope of this assessment.	
<p>Socio-economic status</p> <p>This refers to consideration of those on low incomes, and those living in deprived areas.</p>	<p>In 2023-24, over 300,500 children in London were reported to be living in relative low-income households. This is equivalent to 17.8 per cent of children (see section 4.6.3). This is four percentage points lower than the national average of England (21.8 per cent). The proportion of London’s children living in low-income households is relatively high in Newham (27 per cent), Tower Hamlets (29 per cent), and Barking and Dagenham (26 per cent).¹⁰⁵</p>	<p>N/A</p>	<p>FSM stigma is reduced when all children participate. Data shows Black and mixed-race pupils are more likely to be eligible, indicating higher levels of low income in these groups.</p> <p>CPAG research shows many children in poverty, especially in London, are not eligible for FSM under national thresholds.¹¹⁵ Parental illiteracy, or lack of English, can also limit access – even for those who qualify.</p> <p>IoUH’s evaluation found families on low incomes benefit most from the policy, with Universal Credit recipients more likely to report significant financial help.¹¹⁶ The policy increases take-up among those previously entitled but not registered. IoUH also found universal provision helps reduce</p>	<p>Continue to ask boroughs to use FSM universal registration approaches, such as auto-enrolment.</p> <p>Continue to closely monitor uptake of national funding and PP.</p> <p>Monitor uptake of national funding and meal price amongst schools.</p> <p>Explore the impact on protected characteristics further in a future evaluation.</p>

¹⁰⁵ LG Inform, [Proportion of children aged 0-15 in relative low income families in England](#), November 2024

¹¹⁵ CPAG, [New official data shows 900,000 children in poverty don't qualify for free school meals under national policy](#), June 2024

¹¹⁶ IoUH, [More than a meal: An independent evaluation of universal primary free school meals for children in London](#), November 2024

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	<p>Between 2020-21 and 2023-24, around 2.36 million Londoners (26 per cent) were in relative poverty, after taking housing costs into account.</p> <p>The overall London poverty rate (26 per cent) remains higher than that of the UK (21 per cent). The poverty rate in London is also highest for children compared to other age groups at 35 per cent (see section 4.6.4).</p> <p>In April 2024, 13.8 per cent of London employee jobs were paid below the LLW (see section 4.6.5).</p> <p>Children of low-income parents are more likely to experience food insecurity (see section 3.6.8).</p>		<p>poverty-related stress and stigma, with parents advocating the removal of means-testing to ensure school is a ‘leveller’.</p> <p>EEF’s evaluation showed the policy is well received, especially by families just above means-tested thresholds.¹¹⁷ Families reported reduced financial stress and reassurance that children receive a hot meal daily. When asked about financial impacts, 80 per cent of surveyed parents said UFSM made a difference. Participation levels were high, with almost all schools offering hot meal options.</p> <p>Further considerations: There were concerns that UFSM would reduce means-tested FSM registration, in turn affecting PP funding – particularly in deprived areas with fewer alternative funding sources. IoUH found half of schools reported reduced registration. As of March 2026, 28 boroughs had identified over</p>	

¹¹⁷ EEF, [Universal Primary Free School Meals in London: Interim report](#), December 2025

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	<p>Qualitative studies show that food-insecure children in England experience feelings of stigma and shame (Connolly, 2022;¹⁰⁶ O’Connell and Brannen, 2022).¹⁰⁷</p> <p>There is also evidence that, despite school efforts to minimise children being identified as FSM-eligible, experiences of means-tested FSM provision can also lead to embarrassment and shame (Sahota et al., 2014;¹⁰⁸ O’Connell and</p>		<p>22,200 additional eligible pupils through UFSM registration. This has generated almost £50 million in additional funding for schools, including PP.¹¹⁸ Monitoring will continue as FSM and PP eligibility criteria diverge nationally from 2026. Poverty stigma can deter benefit take-up; and existing research shows FSM eligibility can cause embarrassment. Arbor data shows that, from 2022-23 into 2023-24 and 2024-25, take-up increased among those previously eligible for means-tested support (2022-23: 88.6%; 2023-24: 93.7%; 2024-25: 95.7%).¹¹⁹</p>	

¹⁰⁶ 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.

¹⁰⁷ O’Connell, R. and Brannen, J. (2021) Families and Food in Hard Times: European comparative research. London: UCL Press. DOI:10.14324/111.9781787356559.

¹⁰⁸ 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.

¹¹⁸ GLA London Datastore, [FSM universal registration approaches: Impact data from 28 London boroughs, 2023/24 – 2025/26](#), March 2026

¹¹⁹ GLA London Datastore, [Arbor meals data - London Datastore](#), May 2026

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	<p>Brannen, 2022).¹⁰⁹</p> <p>The programme systematic review¹¹⁰ 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., 2013,¹¹¹ Evans et al., 2016;¹¹² Evans et al., 2020¹¹³). This is particularly the case for children in low-income</p>			

¹⁰⁹ O’Connell, R. and Brannen, J. (2021) Families and Food in Hard Times: European comparative research. London: UCL Press. DOI:10.14324/111.9781787356559.

¹¹⁰ 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

¹¹¹ 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.

¹¹² 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.

¹¹³ 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.

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	households (Stevens and Nelson, 2011). ¹¹⁴			
<p>Other relevant groups</p> <p>For example: carers, people experiencing domestic and/or sexual violence, substance misusers, homeless people, looked after children and ex-armed forces personnel.</p>	<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.¹²⁰</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 2021-22.¹²¹</p> <p>This means that those with caring responsibilities are less likely to be in employment than the</p>	N/A	N/A	N/A

¹¹⁴ 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

¹²⁰ DWP, [Family Resources Survey: financial year 2022 to 2023](#), 2024

¹²¹ Joseph Rowntree Foundation, [UK Poverty 2024](#), January 2024

Protected characteristic group	Baseline/evidence	Potential evidence gaps	Positive and negative impacts	Mitigating actions
	general population – and more likely to be living in relative poverty (see section 3.6.10).			

6. Conclusions and next steps

The EqIA identifies several areas requiring continued monitoring and action:

- continue to ensure UFSM meet diverse cultural, religious and SEND-related dietary needs
- monitor inflation and higher-cost provision on price per meal
- monitor the impact of national FSM expansion on London's schools and funding flows
- continue to track longer-term implications for PP identification and income.

The EqIA will be continuously reviewed; and these issues will be kept under review throughout the Mayor's UFSM scheme.

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. These should continue to feed into the EqIA, as and when they become available. These assessments should also be used to support the ongoing monitoring of the policy, and the uptake of the government scheme; and to enable any necessary policy interventions should they be required.

7. Annex one: Glossary of abbreviations and terms

Abbreviations

Abbreviation	Definition
CPAG	Child Poverty Action Group
DfE	Department for Education
DWP	Department for Work and Pensions
EHCP	Education, health and care plan
EqIA	Equality Impact Assessment
FSM	Free school meals (including the national government's scheme)
GCSE	General Certificate of Secondary Education
GLA	Greater London Authority
IIA	Integrated Impact Assessment
IMD	Index of Multiple Deprivation
LGBTQ+	Lesbian, gay, bisexual, transgender, queer (or sometimes questioning) and others. The "plus" represents other sexual identities, including intersex, asexual, pansexual and Two-Spirit.
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	Office for Standards in Education, Children's Services and Skills
ONS	Office for National Statistics

Abbreviation	Definition
PP	Pupil Premium
PSED	Public Sector Equality Duty
SEND	Special educational needs and disabilities
TP	Transitional Protections
UFSM	Universal free school meals

Terms

Term	Definition
Baseline	Existing conditions against which future changes can be measured.
Equality Impact Assessment (EqIA)	A predictive assessment of the possible equality effects on people sharing one or more protected characteristics, arising from the design and implementation of a proposed plan, policy, project or strategy.
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. It is designed to prohibit discrimination on the grounds of the protected characteristics described in the Act.
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, in England and Wales, for pupils aged 5 to 7.
Key Stage 2 (KS2)	A phase of primary education, in England and Wales, for pupils aged 7 to 11.
No recourse to public funds (NRPF)	People with this condition have no entitlement to the majority of welfare benefits, including income support; housing benefits; and a range of allowances and tax credits.
Protected characteristics	The Equality Act identifies nine characteristics against which it is illegal to discriminate: <ul style="list-style-type: none"> • age • disability • gender reassignment • marriage and civil partnership

Term	Definition
	<ul style="list-style-type: none"> • 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)	<p>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.</p>
Special educational needs and disabilities (SEND)	<p>Learning difficulties or disabilities that make it harder for a child or young person to learn, compared to children of the same age.</p>
Study area	<p>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.</p>
Transitional Protections (TP)	<p>From 1 April 2018, TP were implemented by the DfE in partnership with the DWP. This was to minimise the impact of the Universal Credit rollout, 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, but was subsequently extended. In June 2025, DfE confirmed its intention to end TP at the end of the 2025-26 academic year. This policy change coincides with the introduction of new eligibility criteria for the government's FSM scheme, coming into effect at the start of the 2026-27 academic year.</p>
Universal free school meals (UFSM)	<p>The Mayor of London's scheme to ensure all children in state-funded primary schools in London receive FSM.</p>

8. Annex two: EqIA methodology

Approach to the assessment

The EqIA 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 the UFSM scheme evolves, to:

- reduce or remove potential adverse equality effects
- strengthen potential positive equality effects
- ensure that, where possible, UFSM promotes equality of opportunity.

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 13, below.

Figure 13: LAs in the study area



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)
- the London Health Inequalities Strategy (2018)
- the Mayor's Equality, Diversity and Inclusion Strategy (2018)
- the London Plan (2021)
- the London Environmental Strategy (2018).

Key considerations, deemed relevant to the assessment of equalities effects, include supporting:

- education institutions to reduce health inequalities
- UFSM to reduce food insecurity
- parents and carers to give all children the best possible start to life
- collaboration between groups, helping with 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.

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.¹²²
- Census data has been used to compile a large proportion of the baseline profile. Where possible, data from the most recent census (March 2021), or the most up-to-date population data from the ONS, has been used. 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.

¹²² GLA, Supplementary analysis on London school sector, June 2026

-
- 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. Annex three: Engagement overview

Engagement before the policy launch, and during the first two years

Before the first iteration of the IIA, GLA officers consulted with London boroughs and state-funded primary schools on the UFSM policy. This was to:

- understand any potential barriers to take-up
- explore practical interventions to address these barriers.

This consultation took place through webinars, surveys, steering bodies and advisory groups set up by the GLA; and one-to-one conversations with representatives of LBs and school leaders. The survey received responses from 27 out of 33 LAs. The UFSM team conducted a series of interviews and small group discussions with schools. This included those from outer and inner boroughs, academies and LA-maintained schools, and ensured a range of school sizes. The consultation phase also 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. This 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 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 EqIA (published on 11 July 2023) and the final IIA report published in November 2023.

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

- Most boroughs reported no additional costs for halal meals. Some reported that 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 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 with suppliers (due to economies of scale). 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 average 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 those who eat kosher food; and in some schools, for specific dietary requirements.

Throughout the first year of the policy implementation, the GLA has undertaken ongoing engagement and research with key stakeholders (those delivering the scheme, and those benefiting from it). This has included:

- termly review meetings with all 33 LAs
- in-depth termly interviews with 30 headteachers
- two online communities with 40 parents, and their children

- 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 two years of the policy's rollout, the UFSM team has shared policy updates and best practice via webinar sessions. These focused on operational matters for schools, including PP, procurement and supporting infrastructure (for example, kitchens). The GLA worked with the boroughs that had schemes before 2023, to understand their delivery process and share best practice with others. The GLA established several steering bodies and advisory groups to ensure a user-centred approach to strategy and operational delivery. This, in turn, ensured that boroughs, schools and the GLA had an opportunity to jointly identify and discuss issues during the lead-up to the scheme and its roll-out. These groups included:

- the Partnership Advisory Group
- task-and-finish groups (Evaluation and Monitoring, Schools and Grant Management)
- a UFSM Delivery Group.

In the second year of the policy, the UFSM team continued to share policy updates via Partnership Advisory meetings with the boroughs; and to share best practice, and discuss solutions to common challenges, via webinars and breakout discussions at a stakeholder event with boroughs and other stakeholders. In the second and third years, the team also used surveys, and met with boroughs on a one-to-one basis, to discuss their experiences of delivering the programme. The team used this to shape the programme as appropriate. In the first year of the programme, a Schools Challenge was run for KS2 pupils, with a cookery class as first prize. There have been regular Mayor and Deputy Mayor visits to primary schools throughout the programme.

Ongoing engagement

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

- regular written updates
- regular one-to-one meetings with all boroughs

-
- meetings with London Councils
 - meetings with DfE
 - insight work, as part of the monitoring and evaluation work funded and delivered by external partners
 - informal borough intelligence-gathering, including via a survey
 - a consultation to inform the EqIA
 - public polling and insights work
 - knowledge sharing with boroughs/schools via webinars
 - resource-sharing on webpages
 - school visits
 - a schools bulletin.

Other formats and languages

For a large print, Braille, disc, sign language video or audio-tape version of this document, please contact us at the address below:

Greater London Authority
City Hall
Kamal Chunchie Way
London E16 1ZE

Telephone **020 7983 4000**
www.london.gov.uk

You will need to supply your name, your postal address and state the format and title of the publication you require.

If you would like a summary of this document in your language, please phone the number or contact us at the address above.