
MAYOR OF LONDON

Updated Integrated Impact Assessment Universal Free School Meals

May 2025

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Executive summary

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

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

Due to the ongoing cost-of-living crisis, and the policy's overwhelming success in its first year, the Mayor announced a further £140m in his 2024-25 budget to extend the UFSM scheme. He has now committed to a further year in 2025-26, linked to a manifesto commitment for FSM to be made available for the remainder of the Mayoral term.

Under the national FSM scheme, there is a universal offer for all children in Key Stage 1 (KS1) and Reception. Under this scheme, children in KS2 (Years 3 to 6) are eligible for FSM only if they meet the national government's eligibility criteria. This is, most commonly, where they live in households on Universal Credit earning less than £7,400 a year (after tax, and not including benefits), regardless of the number of children in the family. The Mayor's UFSM scheme is not intended to displace national government funding for KS2 children already in receipt of FSM. The UFSM policy is in line with national government eligibility criteria for KS1.

In line with the national government's FSM scheme, the Mayor of London's policy covers state-funded primary schools (including pupil referral units, special schools, special schools, faith schools and AP) as well as non-maintained special schools. Every borough in the capital will continue to receive £3.00 per meal in funding, to enable schools to deliver the meals over the next year. This is higher than the amount they receive from national government, which in December 2024 increased its funding from £2.53 to £2.58 per meal, following the Mayor's intervention.

Additional funding will remain available to cover the higher price of providing Kosher meals (Jewish state-funded schools will receive an extra 85p (totalling £3.85) per meal); and any exceptional costs to support the higher cost of meals for pupils with special educational needs and disabilities (SEND), where needed.

In 2022-23, five London boroughs (LBs) were already providing their own version of FSM to their London primary state-funded schools. As with the previous two years of the Mayor's UFSM scheme, funding will be allocated to these boroughs as if they had not previously provided this function. The proposed allocation to these boroughs has been worked out in the same way as others. They are encouraged to use the offset funds to support families in financial hardship because of the cost-of-living crisis.

The GLA does not routinely collect data on the take-up of meals offered through the London scheme. This is because it was felt to be too great an additional burden for schools, in the context of a rapid rollout. Instead, the GLA has sought to understand levels of take-up through several sources. This includes: work with the management information systems (MIS) provider Arbor; and insights gathered through discussions with boroughs, and where schools have claimed funding over the initial 90 per cent allocations. These sources have shown a range of uptake levels, from around 58 per cent up to 100 per cent. Using this as a guide, the initial allocation to boroughs for 2025-26 will be based on an

assumed take-up rate of 87 per cent. To ensure no school is out of pocket, each borough will have the opportunity to secure additional funding if they can evidence that uptake of the scheme is higher than this initial allocation.

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

A vital lifeline to many families in London.

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

In November 2023, an Integrated Impact Assessment (IIA) was published. The aim of this was to understand the potential impacts of the Mayor's UFSM scheme; and how the scheme might be refined to address some of those impacts. This has been updated twice since it was originally refreshed, on account of the policy's success resulting in continuation and a commitment from the Mayor of London to run the scheme throughout his mayoral term.

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

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

The original policy assessments of the UFSM scheme remain similar in the context of the policy extension, as the wider landscape and the scheme itself have not materially changed since the UFSM launch (September 2023). The EqIA and IIA will continue to be kept up to date and revised throughout the year, as new data and evidence become available.

Key findings

Universal provision will have a positive economic impact on Londoners who face higher living costs than the rest of the UK, and bring wider benefits to London's economy.

- For the last 20 years, London's poverty rates have sat among the UK's highest. Compared to other regions in England, London also has the highest proportion of children in poverty that do not receive FSM.¹ As the Mayor's FSM offer is universal, regardless of household income, many Londoners who live in poverty – but do not meet national government's prescriptive eligibility criteria – will benefit from the scheme, thereby reducing financial pressures on households.
- According to the Office for Budget Responsibility (OBR), food inflation is projected to be 2.5 per cent for 2024-25. To support UFSM delivery for the 2024-25 school year, the grant allocation per meal rose from £2.65 to £3.00. This goes beyond the

¹ CPAG, Free School Meals: Third of Kids in Poverty Miss Out, July 2023

inflation rate for food prices in 2024-25 (as projected by the OBR in its latest Economic and Fiscal Outlook). More specifically, the grant allocation per meal exceeds the price, after accounting for expected inflation, by more than 10 per cent. This increased price per meal will remain at the uplifted price of £3.00 per meal in 2025-26.

- Cost projections suggest that households could save up to £1,000 per KS2 child across the two academic years. Cost savings may be particularly significant for low-income households; Black, Asian and Minority Ethnic households; single-parent households; and/or disabled households. These groups have all disproportionately felt the effects of the cost-of-living crisis. As an example, a GLA/YouGov poll in October 2024 revealed that, while 50 per cent of all Londoners reported struggling financially or just about managing during the cost-of-living crisis, that figure rises to 62 per cent for Londoners with disabilities, and 66 per cent for low-income households.²
- It is expected that, by maintaining the UFSM policy into 2025-26, London's businesses and its wider economy will continue to see a positive impact. Cost-benefit analysis, conducted in October 2023, shows that universal provision of meals could generate an additional £2.1bn for London, in terms of output, between 2024 and 2030.³
- In some boroughs the additional investment will result in increased workforce requirements – thus having a positive impact on local employment.

The year one evaluation showed:

- 84 per cent of surveyed families said UFSM helped or significantly helped household finances; and 33 per cent said it meant they had less personal debt. For those families it meant more money for other household essentials.
- Families living on low incomes, who are struggling to get by, benefitted most from the policy.
- Parents receiving Universal Credit were more likely to say the policy was 'significantly helping' household finances.⁴

The year one evaluation shows that the Mayor's UFSM scheme has had positive effects on the health and wellbeing of the children and their wider families.

- By guaranteeing that children will have access to at least one meal a day, the health and wellbeing of those currently experiencing food insecurity is expected to continue improving. This will bring benefits for children's growth and development, and educational attainment, as well as mental health benefits for their families, by reducing concerns about food insecurity. Early insights from our work with schools and boroughs in year one of the scheme support this expectation, which will be explored further over year two.
- The year one Impact on Urban Health (IoUH) report shows that the increased FSM provision has helped with children's readiness to learn. Parents, school staff and

² London Datastore, [GLA cost of living polling](#)

³ IoUH, [An Economic Contribution Analysis of Free School Meal Provision Expansion](#), November 2023

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

children in most schools noticed positive shifts in concentration and energy levels. 34 per cent of parents felt that UFSM means their child can concentrate better in lessons.⁵

- On pupil health, new evidence from the Institute for Social and Economic Research (ISER), Child Poverty Action Group (CPAG) and the National Education Union (NEU) shows that FSM can have a positive effect on child obesity rates; eating habits; home-school relationships; and uptake amongst pupils eligible for government FSM. The year one IoUH evaluation also showed that the policy has significantly addressed issues of dinner money debt; parents who had previously avoided contact with schools, due to debt, reported feeling able to come into school.⁶
- Families told us that the UFSM policy enabled them to afford healthier food at home: 60 per cent of parents surveyed said they were able to spend more on food for their families.
- Parents across the income spectrum talked about how their children were eating more varied food. 55 per cent of parents thought their child was trying new foods because of the policy (up to 63 per cent for families receiving Universal Credit).

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

- The UFSM grant principles (as set out on page 8 onwards, below) commit to ensuring that food is culturally appropriate, in line with the national government school food standards.
- Additionally, the cost for kosher meals in London is higher than others; so, as in the first two years of the programme, top-up funding per meal has been allocated for state-funded Jewish schools as part of the 2024-25 funding formula.
- Key information about UFSM, provided to parents/families who do not have English as their primary language, has been translated to ensure accessibility. Further engagement with communities will be undertaken to improve their access to the meals.
- Pupil premium application data in March 2025 indicates that, whilst there are fluctuations at borough level, city averages have not fluctuated significantly since the Mayor's scheme was introduced in 2023. However, the GLA will continue to support boroughs in their adoption of auto-enrolment, to ensure all eligible pupils are registered with the government's FSM scheme. In year one, the GLA provided a £20,000 grant to each borough in support of local auto-enrolment approaches. For year three of the policy, boroughs will be required to have adopted a universal registration approach by October 2025. This will help to ensure that income for schools from the pupil premium remains unaffected, particularly in the context of the end of transitional protections (further detail on this provided below).

⁵ IoUH, More than a meal: An independent evaluation of universal primary free school meals for children in London, November 2024

⁶ IoUH, More than a meal: An independent evaluation of universal primary free school meals for children in London, November 2024

Monitoring and evaluation should continue to be underpinned by the IIA recommendations, current evidence and the Theory of Change.

- As the policy continues into its third year, addressing the cost-of-living crisis will remain a key objective. However, given the longer-term nature of the policy, there is also an opportunity for the programme to influence the wider benefits identified in the Theory of Change – such as education, and health and wellbeing outcomes. Assessing the impact on household financial circumstances, and wider benefits and associated outcomes identified in the Theory of Change, will continue to be monitored into the second year of the policy.
- The Theory of Change was published in June 2023. It was reviewed following the announcement of the extension, with emerging insight from year one considered. Latest research continues to show the success of the UFSM scheme, in terms of alleviating household financial hardship and reducing food insecurity. An ISER study reported household savings of £41 every four weeks. A slight improvement in reading scores was also found, but no improvement in maths or writing was observed.⁷
- The monitoring and evaluation strategy for the policy continues to be informed by: a review of the year one and two IIAs; the updated Theory of Change; the latest literature; and insights gathered through engagement with expert stakeholders.
- The year one independent evaluation was published in October 2024. The impact evaluation is due to be published in autumn 2025.
- Work to investigate the health impacts (including physical health, weight and height) could be further explored once longer-term data becomes available.
- The GLA will continue to track the uptake of the Mayor's FSM to assess the scheme's reach and access amongst pupils with different demographics and protected characteristics. These findings will continue to guide policy development and support for specific groups.
- The removal of transitional protections in March 2025 may lead to a significant decrease in pupil applications. The GLA will continue to monitor the data on the national government FSM and pupil premium, which is published annually.
- The GLA will continue to monitor in-year impact and gather insight amongst schools and boroughs. This will guide the implementation of the policy, and clarify possible issues relating to infrastructure and implementations.
- Following the recent government ban on single-use plastics, and the Extended Producer Responsibility scheme through Simpler Recycling, caterers are required to reduce the amount of plastic packaging in school food production. There is an opportunity for the GLA to convene boroughs on this latest government legislation; and consider the role boroughs could play in monitoring packaging relating to UFSM. Boroughs are requested to adhere to a set of grant conditions and principles that have been developed by the GLA, including consideration of sustainable catering guidelines and environmental aims.

⁷ ISER, [The impacts of Universal Free School Meal schemes in England](#), February 2024

Introduction

Purpose of the IIA

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

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

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

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

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

Development of the IIA

- The Mayor's UFSM policy launched in 2023 as a response to the cost-of-living crisis. As such, the policy had to be developed quickly to ensure readiness for the academic term starting in September 2023. The IIA was updated to inform the policy extension in year two; it has now been refreshed again, to inform year three.
- The UFSM policy was refined based on the findings outlined in the IIA and EqIA.
- This current IIA report has been informed by:
 - the IIA and EqIA
 - a revised assessment of new data and current literature
 - a review of the Theory of Change in light of year two policy parameters
 - stakeholder engagement
 - evaluation of year one, and insights gathered throughout years one and two of the policy.

Policy details

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

In February 2023, the Mayor announced a £130m emergency funding plan to help families with the spiralling cost of living. He launched a world-leading policy offering UFSM to all KS2 children attending a state-funded primary school. Due to the ongoing cost-of-living crisis, and the policy's overwhelming success in years one and two, the Mayor announced a further £147m in his budget to continue supporting families financially, through delivery of the scheme into year three (the 2025-26 academic year). His manifesto commits to making FSM available for the rest of his Mayoral term.

Under the national government FSM scheme, there is a universal offer for children in KS1 and Reception. Under this scheme, children in KS2 (Years 3 to 6) are eligible for FSM only if they meet the national government's eligibility criteria. This is, most commonly, where they live in households on Universal Credit earning less than £7,400 a year (after tax, and not including benefits), regardless of the number of children in the family.

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

In line with the national government's FSM scheme, the Mayor of London's policy covers state-funded primary schools (including pupil referral units, special schools, faith schools and AP) as well as non-maintained special schools.

Every borough in the capital will continue to receive £3.00 per meal in funding, to enable schools to deliver the meals over the 2025-26 academic year. This is higher than the amount they receive from the national government, which offers £2.58 per meal. This price per meal was uplifted after the first year of the policy, to reflect feedback on implementation from schools and boroughs in year one. It remains at this higher price for year three.

In year three of the programme, funding will continue to help up to 300,000 extra primary schoolchildren; and save families in London over £500 per eligible child across the year.⁸ All schools will receive a grant based on an assumed 87 per cent uptake. This is based on insights from years one and two, which put the range of uptake at between 58 per cent and 100 per cent. However, boroughs that can evidence a higher uptake will receive further funding.

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

⁸ More information on GLA cost savings calculations be found at: GLA, [Free School Meals: No child should go to school hungry](#)

Policy access

In addition to the Equality Impact Assessment, the GLA conducted a supplementary analysis on whether it was feasible to extend the policy's scope beyond the national government FSM scheme, which informed the Mayoral Decision for the programme. This analysis is set out in Annex C, and has been revisited in light of the ongoing nature of the policy.

The UFSM scheme is just one measure within a range of steps the Mayor is taking to help Londoners deal with the cost-of-living crisis. For example, this year the Mayor has invested £3.9 million to deliver over 10 million meals during school holidays and at weekends through partners the Felix Project and Mayor's Fund for London. Going forward there is an ongoing commitment to deliver food support to young people as part of a Holiday Hope programme, which will look at providing positive opportunities for young people during the holidays.

The Mayor has also £498,000 invested into a London pilot of Multibank which supplies in-kind donations of essential goods to organizations that work with Londoners struggling with the cost of Living. This includes support to establish a partnership with baby bank network, Little Village, to enhance provision of essential items that families in London are increasingly struggling to afford. Additionally, the funding is enabling Little Village to open some of its hubs on evenings and weekends so that Little Village can reach more working families, outside of normal working hours, with essential items and with wraparound support for their financial situations.

Grant conditions and principles

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

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

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

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

The above principles were included in the grant agreement for year two of the UFSM programme. For year three an additional requirement will be included as a grant condition:

- Boroughs will be required through a grant condition in Year 3 to have implemented an approach to universal registration ahead of October 2025 census day. This is in order to further protect pupil premium grant income for schools. The preference is for adoption of auto-enrolment as evidence shows this is an effective approach. However, where successful alternative approaches are in place locally this will be taken into consideration.

Background

The Mayor believes that all primary school children in state-funded schools, including all-through schools, academies, state-funded special schools, alternative provision (AP), and non-maintained special schools (NMSS) should have access to free school meals (FSM). In July 2023, the Mayor approved an emergency funding plan to help families with the spiralling cost of living. This funding ensured that primary school children in London's state-funded schools received FSM in the next 2023-24 academic year.

Due to the ongoing cost-of-living pressures, funding has now been extended to the 2024-2025 and 2025-26 academic years. This will enable those local authorities (or the schools they fund) to continue delivering Universal Free School Meals (UFSM) to KS2 children in London state-funded primary schools, with a view to continuing to help families financially. The Mayor has confirmed his intention to continue funding UFSM until the end of his Mayoral term in 2028. Across England, all state-funded schoolchildren at KS1 (Reception to Year 2) currently receive FSM as part of the government's Universal Infant Free School Meal (UIFSM) scheme. At KS2 (primary schoolchildren in Years 3-6), only those that meet specific eligibility criteria received FSM, prior to the introduction of the Mayor's scheme in September 2023.

Five LBs were also already implementing UFSM for all primary school pupils prior to September 2023:

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

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

Research by CPAG⁹ has shown that hundreds of thousands of schoolchildren live in poverty, but are not currently eligible for government FSM. In addition, although data on eligible schoolchildren is held at government level, the current process means that parents have to formally apply to their local authority (LA), or via their child's academy school, to claim FSM. In 2023-24, in London state-funded primary schools, just over 15 per cent of

⁹ CPAG, [By region: number of children in poverty not eligible for free school meals](#), 1 September 2022

children eligible for FSM had not taken up the offer.¹⁰ Although there are limited studies looking at why this might be, one study identified that stigma, quality of school meals and a lack of knowledge around entitlement had contributed to lack of take-up.¹¹

Historically, families who were undocumented due to their immigration status, and/or with no recourse to public funds (NRPF) (i.e., no entitlement to the majority of welfare benefits including income support, housing benefits, and a range of allowances and tax credits) were not entitled to FSM under the current eligibility criteria for KS2 pupils in state-funded primary schools. However, a scheme to make FSM available to these families was introduced during COVID-19. This was permanently extended to all households with NRPF in January 2023.

Government guidance

National government guidance has recently been updated on the policy position for children receiving education otherwise than at school (EOTAS). The national guidance states that “**no specific provision is made in legislation** for FSM to be provided to children who are in receipt of EOTAS”.¹²

However, according to the guidance, the **government expects LAs to consider making equivalent food provision for children who are receiving EOTAS**, where they meet both of the following criteria:

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

The Department for Education (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:

“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.

¹⁰ DfE: Explore education statistics service, 'FSM eligibility by ethnicity or national curriculum year group' from 'Schools, pupils and their characteristics'

¹¹ Yang TC, Power M, Moss RH, et al, 'Are free school meals failing families? Exploring the relationship between child food insecurity, child mental health and free school meal status during COVID-19: national cross-sectional surveys', *BMJ Open*, 2022; 12:e059047. doi: 10.1136/bmjopen-2021-059047

¹² DfE, *Free School Meals: Guidance for local authorities, maintained schools, academies and free schools*, March 2024

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, which includes 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. LBs may use GLA funding for these pupils, should it be deemed appropriate.

Outcomes from the Mayor’s scheme:

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

Approach to the IIA

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

Figure 1: LAs in the study area



Overview of the IIA process

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

Each assessment brought into the IIA has its own legal requirements and/or guidance to adhere to and apply. The section below describes the methodologies for the IIA components, based on relevant legislation, guidance and best practice.

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

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

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

In developing the IIA, and throughout the policy cycle, a range of stakeholders were interviewed and involved in shaping some of the policy. This informed the refinement of the policy in years two and three.

Scope of each assessment

Equalities Impact Assessment

Legislation and guidance

The Equality Act 2010¹³ provides that, in the exercise of their functions, public bodies must have due regard to the need to:

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

This is known as the public sector equality duty.

An EqIA is a means of systematically identifying and assessing the likely effects arising from the design and implementation of a plan, policy or project for people sharing one or more protected characteristics. The GLA's internal EqIA framework and guidance were refreshed in 2023. These updated tools have been used to form the equalities considerations of this IIA.

Methodology

The EqIA has been incorporated into the IIA framework.

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

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

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

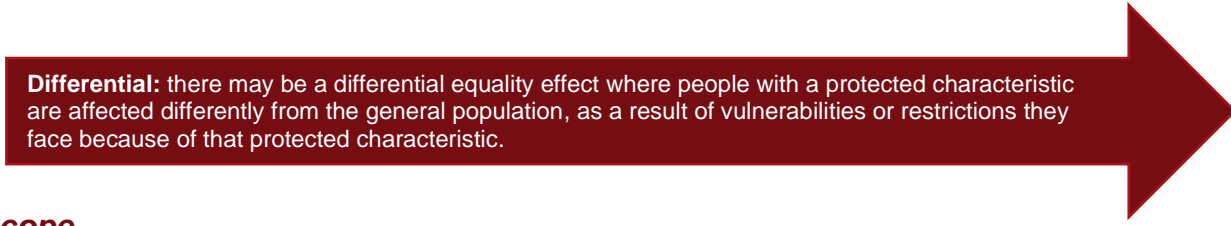
¹³ Government Equalities Office/Equality and Human Rights Commission, [Equality Act 2010: guidance](#), 16 June 2015

- sexual orientation.

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



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



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

Scope

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

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

Economic Impact Assessment

Legislation and guidance

As part of the EqIA, there have been a distributional appraisal of savings on food costs to households; and an empirical analysis of effects on associated businesses and the wider economy.

There is currently no statutory legislation on undertaking distributional appraisals. This appraisal is therefore based on the HM Treasury's Green Book.¹⁴

Methodology

The distributional appraisal is based on the following stages:

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

¹⁴ HM Treasury, The Green Book: Central government guidance on appraisal and evaluation, March 2022

- stage 4: quantifying relative savings.

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

Scope

The EcIA has looked at:

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

Health Impact Assessment

Legislation and guidance

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

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

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

- Public Health England's (PHE's) HIA in Spatial Planning report¹⁵
- the Institute of Environmental Management's guides:
 - Effective Scoping of Human Health in Environmental Impact Assessment
 - Determining Significance for Human Health in Environmental Impact Assessment
- the London Healthy Urban Development Unit (HUDU) Rapid HIA Tool¹⁶
- the Dahlgren and Whitehead model of health determinants.

Methodology

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

¹⁵ PHE, [Health Impact Assessment in spatial planning](#), October 2020

¹⁶ London HUDU, [Rapid Health Impact Assessment Tool](#), October 2019

Scope

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

The following topics were included for assessment:

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

Environmental Assessment

Legislation and guidance

A Sustainability Appraisal (SA) and an SEA are required under two separate pieces of legislation. The SA encompasses the requirements of the SEA regulations, which require an assessment of the likely significant environmental effects arising from a plan or programme. The SA ensures that potential environmental effects are given full consideration alongside social and economic issues.

Key guidance that informs the SA and the SEA includes:

- the Royal Town Planning Institute (RTPI) guidance¹⁷
- Department for Levelling Up, Housing and Communities (DLUHC) guidance on SEA and SA¹⁸
- Ministry of Housing, Communities and Local Government (MHCLG) guidance on the SEA Directive.¹⁹

Methodology

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

Scope

A review was made of the following environmental topics, considered to be potentially affected, either positively or negatively:

- air quality
- climatic factors
- waste.

¹⁷ RTPI, [Strategic Environmental Assessment: SEA/SA for land use plans](#), 17 January 2018

¹⁸ DLUHC and MHCLG, [Strategic environmental assessment and sustainability appraisal](#), 31 December 2020

¹⁹ MHCLG, [Strategic Environmental Assessment Directive: guidance](#), 2 September 2005

Supporting technical appendices

The IIA is supported by detailed technical reports including:

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

Assumptions and limitations

The following assumptions and limitations have been made:

- The policy is aligned to the scope of the government's current FSM scheme, as set out in the DfE guidance.²⁰ The government's current FSM scheme does not extend to pupils within private or independent schools (other than NMSS); it has been decided to adopt this same approach in the Mayor's policy.

The policy will continue to cover all primary school children in state-funded schools, including all-through schools, academies, state-funded special schools, alternative provision (AP), and non-maintained special schools

Engagement and analysis highlighted a need to further investigate the potential impact of the policy on schools across the whole education sector, including independent schools. This additional analysis has been conducted by the GLA, and can be found as a supplementary paper to the EqIA. Both of these are set out in **Annex B** (EqIA) and **Annex C** (supplementary analysis). Following this analysis, a decision was taken²¹ not to extend the Mayor's policy to independent schools.

- With regard to the EqIA and the protected characteristic of belief/faith, the assessment has focused on faiths for which census data on prevalence is available – namely the Christian, Buddhist, Hindu, Jewish, Muslim and Sikh faiths. However, there is an awareness that other faiths also exist, and members of these communities may also have specific dietary needs associated with their beliefs. Awareness of specific needs is undertaken through programme monitoring and evaluation mechanisms and responded to where appropriate. These include, but are not limited to Rastafarians, members of the Church of Jesus Christ of Latter-Day Saints, and Seventh-day Adventists.
- It is assumed that all eligible schools in London will continue to take up the funding offer.
- A full IIA was developed alongside initial development of the policy. This has been updated in light of the policy continuing. The IIA and EqIA will continue to be reviewed at regular intervals and when specific need arises.

²⁰ DfE, [Free school meals: guidance for schools and local authorities](#), 31 January 2023

²¹ GLA, MD3146 Primary School Universal Free Schools Meal Provision 2023-2024, July 2023

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

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

There are several strategies setting out the Mayor's vision for specific topic areas, including:

- the London Plan (2021),²² which brings together the geographic and locational aspects of other strategies, and provides the policy framework for the Mayor's own decisions on strategic planning
- the London Health Inequalities Strategy (2018)²³
- the Mayor's Equality, Diversity and Inclusion Strategy (2018);²⁴ and the Mayor's Equality Objectives (2022), specifically objective 7, to "remove the barriers preventing children and young Londoners from realising their potential now and in later life"
- the London Environment Strategy (2018).²⁵

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

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

Overarching topic	Sub-topic	Key considerations
Diversity of experience, and strength of effect, by different socio-economic and demographic groups, household characteristics and geographic locations	Population and equity	Support education institutions to reduce health inequalities. Support UFSM to reduce food insecurity. Support parents and carers to give all children the best possible start to life. Respond to faith and cultural needs.
Economics – local economy	Wider economic impacts	Support schools' capability to provide UFSM. Promote local economic multiplier effect. Support local jobs and businesses.
	Mental and physical health	Access to healthy food. Help children maintain a healthy weight.

²² GLA, [The London Plan](#), March 2021

²³ GLA, [The London Health Inequalities Strategy](#), September 2018

²⁴ GLA, [Inclusive London: The Mayor's Equality, Diversity and Inclusion Strategy](#), May 2018

²⁵ GLA, [London Environment Strategy](#), May 2018

Overarching topic	Sub-topic	Key considerations
Child and family health and wellbeing		<p>Support water-only primary schools.</p> <p>Support education institution to provide programmes for healthier food and reduce health inequalities.</p> <p>Support uptake of FSM and UFSM to reduce child food insecurity.</p>
	Social cohesion and inclusive design	<p>Improve social cohesion and inclusion.</p> <p>Reduce health inequalities and stigma.</p>
Attainment	Education and skills	<p>Support the Office for Standards in Education, Children's Services and Skills (Ofsted) to adopt food as key indicator of a school's performance.</p> <p>Support further guidance to support implementation of school food standards and whole-school food policies.</p> <p>Schools support health and wellbeing of children and families, particularly the most vulnerable.</p> <p>If practical, food growing should be included in playgrounds and school sites, aiding educational benefits and health.</p>
Environmental sustainability	Air quality	<p>Improve air quality and reduce exposure to harmful pollution – particularly in propriety areas (such as schools) and the most disadvantaged areas.</p>
	Climate change and greenhouse gas emissions	<p>Promote low-emission vehicles, and/or reduce car dependency.</p> <p>Support a low-carbon circular economy.</p>
	Waste	<p>Reduce waste, particularly food waste and single-use plastic.</p> <p>Promote a circular economy.</p>
Mitigating the impact of the cost-of-living crisis	Income and poverty	<p>Improved economic welfare for households.</p>
	Socioeconomic inequalities	<p>Support households in relative and absolute poverty by reducing financial pressures.</p>

Baseline information and key considerations

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

Table 2: Key baseline features and considerations

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

Key baseline features	Considerations
Mitigating the impacts of the cost-of-living crisis	
HM Government FSM eligibility	
<p>26.6 per cent of school pupils in London are eligible for government FSM, compared to 24.6 per cent in England.²⁶</p> <p>81 per cent of eligible pupils in London take FSM, compared to 78 per cent in England.²⁷</p> <p>36 per cent of London children in poverty do not receive FSM (this does not take account of UFSM). This is the highest proportion of all regions in England.²⁸</p> <p>Of FSM-eligible pupils in London in the 2023-24 school year, 30 per cent were White; 26 per cent were Black; 18 per cent were Asian; and 14 per cent were of Mixed ethnicity.²⁹</p> <p>FSM-eligible pupils typically achieve lower GCSE attainment.³⁰</p> <p>In London, 40 per cent of children with SEND are eligible for FSM. This is higher than children without educational needs, at 24 per cent.³¹</p> <p>Pupil premium application analysis in May 2024 showed there has not been a significant shift in the city average this academic year, since the UFSM scheme was introduced. However, there are some fluctuations at a borough level: 15 boroughs saw an increase in pupil premium applications; 18 boroughs saw a decrease.</p> <p>In December 2023, polling from YouGov, commissioned by City Hall, found that 35 per cent of parents or carers of children under 18 were buying less food and essentials, with 41 per cent using less water, energy or fuel to help</p>	<p>Consider ways to address the insights gathered about uptake across all demographics.</p> <p>Monitor the impact caused by removing the government-funded transitional protections (which stop after March 2025).</p>

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

²⁷ DfE, 'Pupil characteristics - number of pupils by fsm eligibility' from 'Schools, pupils and their characteristics', 6 June 2024

²⁸ CPAG, [Free School Meals: Third of Kids in Poverty Miss Out](#), July 2023

²⁹ DfE, [Academic year 2023/24: Schools, pupils and their characteristics](#), 6 June 2024

³⁰ IFS, [The state of education: what awaits the next government?](#), 6 June 2024

³¹ DfE: [Explore education statistics, Academic year 2023/24: Special educational needs in England](#), 20 June 2024

<p>them manage living costs. 30 per cent said they were 'financially struggling'.³²</p> <p>The FSM protections policy was introduced in 2018, to protect those eligible for FSM from becoming ineligible while Universal Credit was being rolled out. This was originally set to last until March 2022, and was subsequently extended to March 2025</p> <p>This means that a pupil who was eligible for FSM at any time since 1st April 2018 will maintain their eligibility throughout their current educational stage, irrespective of subsequent household income increases above the current FSM threshold or changes in benefit status. As these protections ended on 31st March 2025, pupils on current transitional protections will lose their FSM entitlement when they leave their current stage of schooling (either primary year 6 or secondary year 11).</p>	
Population and demographics	
<p>London's population is projected to increase to 9.7m by 2040.³³</p> <p>London has a high population density (5,598 per km²) compared to the England average (434 per km²), especially within central boroughs.³⁴</p> <p>The majority of households in London are single-family households.³⁵</p>	<p>Continue to monitor the implications of the cost-of-living crisis on single-parent households, in partnership with communities and social policy.</p>
Equality groups/inequalities	
<p>London is more ethnically diverse than the rest of England – 61 per cent of primary-school pupils in state-funded schools (across all years) identify as Black, Asian, Mixed and/or 'Other'.³⁶</p> <p>Within London, Black, Asian and Minority Ethnic groups are more likely to be in poverty (33 per cent) than White people (18 per cent).³⁷</p> <p>The percentage of individuals identifying as Buddhist, Hindu, Jewish, Muslim, Sikh or part of an 'Other' religion</p>	<p>Continue to ask boroughs to cater for ethnically and religiously diverse boroughs.</p>

³² All figures, unless otherwise stated, are from YouGov Plc. Fieldwork was undertaken between 8th to 14th December 2023. The survey was carried out online. The figures have been weighted and are representative of all London adults (aged 18+). Parents or carers of children under 18 sample size is 233. 'Financially struggling' is the combined responses for "I am having to go without my basic needs and/or rely on debt to pay for my basic needs" and "I'm struggling to make ends meet" (<https://data.london.gov.uk/gla-cost-of-living-polling/2/>).

³³ GLA 2022-based projections, 10-year central fertility variant.

³⁴ ONS, [Population density](#), 2021

³⁵ ONS, [Families and households in the UK: 2023](#), 8 May 2024

³⁶ DfE, [Academic year 2023/24: Schools, pupils and their characteristics](#), 6 June 2024

³⁷ Trust for London, [London's Poverty Profile](#), 2022/23, May 2024

<p>in London is relatively high, compared to the England average.³⁸</p> <p>Out of 1,787 state-funded primary schools in London, 512 (28.7 per cent) are categorised as faith schools.³⁹</p> <p>In total there are 143,814 pupils in London state-funded faith schools. This is approximately 21 per cent of all state-funded primary school pupils in London.⁴⁰</p> <p>According to 2021 data, 5.3 per cent of London's children aged 5-9 are disabled. These values are slightly lower than the England average of 6.5 per cent.⁴¹</p> <p>The LBs with the highest proportion of disabled children aged 5-9 are Islington (7.4 per cent), Hillingdon (6.3 per cent), Tower Hamlets (6.3 per cent) and Sutton (6.2 per cent).⁴²</p> <p>SEND is more prevalent among disadvantaged pupils than their less disadvantaged peers – a situation that is common to all four nations of the UK.⁴³</p> <p>In 2023-24, 38 per cent of pupils with SEND in state-funded primary schools in London were eligible for FSM. The highest proportions of SEND children eligible for FSM are in Camden (58 per cent) and Islington (57 per cent). The lowest are in the City of London (23 per cent) and Redbridge (24 per cent).⁴⁴</p>	
Employment, income and local economy	
<p>Over 30 per cent of employment type is made up of jobs classified as 'higher and lower managerial, administration and professional occupancy'.⁴⁵</p> <p>Employment deprivation, defined as the number of adults involuntarily excluded from the labour market, is greatest in Islington, Hackney, and Barking and Dagenham.⁴⁶</p> <p>Within London, the boroughs with the highest child poverty rates are Tower Hamlets, Newham, Barking and Dagenham, and Hackney.⁴⁷</p>	<p>Retain the higher price per meal of £3.00.</p> <p>Work with boroughs to support adoption of auto-enrolment processes, to ensure that families can access any benefits that they are eligible for.</p>

³⁸ ONS: Census 2021, [Religion](#), 29 November 2022

³⁹ DfE, [Academic year 2023/24: Schools, pupils and their characteristics](#), 6 June 2024

⁴⁰ DfE, [Academic year 2023/24: Schools, pupils and their characteristics](#), 6 June 2024

⁴¹ ONS, [Disability in England and Wales: Census 2021, 2023](#)

⁴² ONS, [Disability, England and Wales: Census 2021, 2023](#)

⁴³ Joseph Rowntree Foundation, [Special educational needs and their links to poverty](#), 2016

⁴⁴ DfE: Explore education statistics, [Academic year 2023/24: Special educational needs in England](#), 20 June 2024

⁴⁵ ONS: Census 2021, [Socio-economic Classification](#)

⁴⁶ MHCLG, ID – Employment deprivation, 2019

⁴⁷ Trust for London: London's Poverty Profile, [Proportion of children in poverty before and after housing costs by London borough \(2022/23\)](#), 2024

<p>In 2020-21, 33 per cent of London's children (700,000) were in poverty 2019-20 to 2021-22 using the relative poverty after housing costs measure.⁴⁸</p> <p>The proportion of Londoners living in poverty (relative poverty after housing costs) has dropped in the last four years. However, it remains higher than the national average.⁴⁹</p> <p>As of April 2023, over 13 per cent of employee jobs in London paid below the London Living Wage.⁵⁰</p> <p>Trust for London's Cost of Living Tracker notes that London households with the lowest incomes (bottom two quintiles) have experienced the greatest increases in the price of good and services they consumed (29 per cent in October 2024 compared to the three years to March 2020), relative to more affluent households.⁵¹</p> <p>The prices of food and necessities in London remain generally higher than those in the rest of the UK.</p> <p>Income inequalities are much starker in London than in the rest of the UK: the richest tenth of Londoners have almost nine times the income of the poorest tenth (twice the ratio for the rest of the UK).⁵²</p> <p>Within London, income deprivation affecting children is highest in the capital's central eastern boroughs.⁵³</p>	
Education/attainment	
<p>Out of 1,787 state-funded primary schools in London, 512 (28.7 per cent) are categorised as faith schools.⁵⁴</p> <p>London has 160 state-funded special schools.⁵⁵</p> <p>In 2022-23, overall school absence rate in London is 7.2 per cent in inner London; and 6.9 per cent in outer London. Among LBs, the overall absence rate is highest in Camden (8 per cent), Westminster (8 per cent) and Islington (7.9 per cent); and lowest in City of London (5.2 per cent) and Richmond upon Thames (5.9 per cent).⁵⁶</p> <p>Nearly half of London residents obtained Level 4 as their highest qualification in 2021, higher than the national average.⁵⁷</p>	<p>Through work with external partners, seek to deepen the understanding about the link between education outcomes and UFSM.</p>

⁴⁸ London Datastore, [Poverty in London 2021/2022](#), 27 March 2023

⁴⁹ London Datastore, [Poverty in London 2021/2022](#), 27 March 2023

⁵⁰ ONS via GLA, [State of London Report](#), June 2024

⁵¹ Trust for London, [London's Cost of Living Tracker](#), 2024. <https://trustforlondon.org.uk/data/topics/cost-of-living-tracker/?tab=the-impact-of-inflation&panel=income-quintiles>

⁵² DWP via GLA, [State of London Report](#), June 2024

⁵³ LG Inform, [Proportion of children aged 0–15 in relative low-income families in England, 2023](#)

⁵⁴ DfE, [Academic year 2023/24: Schools, pupils and their characteristics](#), 6 June 2024

⁵⁵ DfE, [Academic year 2023/24: Schools, pupils and their characteristics](#), 6 June 2024

⁵⁶ DfE: Explore education statistics, [Pupil absence in schools in England, 2023](#)

⁵⁷ ONS, [Census 2021, Highest level of qualification, 2021](#). Based on London's adult population.

<p>London is experiencing a decrease in demand for primary school places, with a predicted 7.6 per cent decrease in pupil numbers from 2022-23 to 2026-27.⁵⁸</p> <p>In London, children with SEND are almost four times more likely to be excluded than their peers who do not have SEND. 43 per cent of all permanently excluded pupils in London have some form of identified SEND.⁵⁹</p>	
Child and family health and mental health and wellbeing	
<p>In London, the proportion of people who are not recorded as disabled is higher than the national average.⁶⁰</p> <p>According to Census 2021, London residents typically have better self-reported general health than national levels.⁶¹</p> <p>London has a higher prevalence of obese Year 6 pupils than the national average.⁶²</p> <p>The latest data for 2023-24 shows that, in London, 41,388 pupils across all ages have social, emotional and mental health needs. Of these, 18,016 are in state-funded primary schools.⁶³</p> <p>Debt, food insecurity, fuel poverty, deprivation, and the isolation and uncertainty that is inextricably tied to these issues provide an environment that enables poor mental health and wellbeing to flourish on a population-wide scale.</p> <p>Mental health referrals within the NHS in England reached record levels of 5m in 2023, with 1m people waiting to start treatment. Those in the areas of higher deprivation are more likely to be in contact with mental health services.⁶⁴</p> <p>Children living around debt are five times more likely to be unhappy than children from wealthier families.⁶⁵</p>	<p>The GLA will continue to encourage sign-up to Healthy Schools London awards and water-only policies. This will be done through active promotion, and inclusion in the grant principles.</p> <p>Borough UFSM contracts should ensure compliance with national school food standards.</p>
Environment sustainability	
<p>99 per cent of all primary and secondary schools in London in 2019 exceed the World Health Organization (WHO) interim air quality guidelines for NO₂.⁶⁶</p> <p>88 per cent of all educational establishments in London exceed the WHO interim air-quality guidelines for PM_{2.5}.⁶⁷</p>	<p>Consider mitigations to ensure that any increases in food delivery or food production do not exacerbate existing air-</p>

⁵⁸ London Councils, *Children and young people*, 2023

⁵⁹ DfE, *Autumn term 2023/24: School suspensions and permanent exclusions in England*, 18 July 2024

⁶⁰ ONS, *Disability – age-standardised*, 2021

⁶¹ ONS, *Census 2021, General Health – age-standardised*, 2022

⁶² OHID via *Fingertips*, *National Child Measurement Programme, 2020-22*

⁶³ DfE: *Explore education statistics, 'Age and Gender, by type of SEN provision and type of need - 2016 to 2024' from 'Special educational needs in England'*, 2023

⁶⁴ BMA, *Mental health pressures in England*, 4 October 2024

⁶⁵ The Children's Society, *The Damage of Debt*, September 2016

⁶⁶ GLA, *London Atmospheric Emissions Inventory (LAEI) 2019*

⁶⁷ GLA, *London Atmospheric Emissions Inventory (LAEI) 2019*

<p>Research by WRAP in 2011 showed that approximately 72g of food waste is produced per primary school pupil per year across England.⁶⁸</p> <p>The main sources of food waste in primary schools can be attributed to the kitchen (i.e., food not served) and canteen (i.e., food served but not eaten). Each of these sources produces approximately 36 per cent of a school's food waste.⁶⁹</p> <p>New legislation on food packaging came into force earlier in 2024 and encourage 'small producers to collect data' on packaging. This includes the government ban on single-use plastics, and the extended producer responsibility scheme.⁷⁰</p>	<p>quality issues for schoolchildren.</p> <p>Grant principles to encourage boroughs to adopt good practice around sustainability.</p>
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⁶⁸ WRAP, [Food waste in schools](#), 2011

⁶⁹ WRAP, [Food waste in schools](#), 2011

⁷⁰ Defra, [Extended producer responsibility for packaging: who is affected and what to do](#), 7 June 2022 – updated 3 April 2025

Stakeholder engagement and consultation

Stakeholder engagement is a key part of an IIA methodology, and of policymaking more generally within the GLA. The views of stakeholders have informed the scope of the IIA; and the interim and final assessments comprising the IIA and its refresh. They also inform ongoing policy refinement, and the year one evaluation.

Engagement

Prior to the first iteration of the IIA, GLA officers consulted with LBs; London Councils; other cities and countries offering or developing a UFSM offer; caterers; and state-funded primary schools. Their views on the UFSM policy helped the GLA to understand any potential barriers to take-up; and to explore practical interventions to address these barriers. This also included representatives from faith groups.

This consultation took place through webinars, meetings, surveys, steering bodies and advisory groups set up by the GLA; and one-to-one conversations with representatives of LBs and London Councils, faith leaders, and school leaders.

The survey received responses from 27 out of 33 boroughs.

The UFSM team conducted a series of interviews and small group discussions with schools – including those from outer and inner boroughs, academies, faith schools 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. This was also underpinned by an evidence review.

To inform the first iteration of the IIA, an initial scoping exercise was undertaken that formed the basis of an initial assessment with high-level interim findings. This initial assessment explored the potential issues and sensitivities to implementing the UFSM policy for individuals with 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. This was updated in 2024, and has been refreshed for year three of the policy.

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

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

Engagement during years one and two of the scheme

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

During years one and two of the policy's rollout, the UFSM team has shared policy updates and best practice via webinar sessions. These have focused on key issues for schools and boroughs, including pupil premium, auto-enrolment and the food offer. The GLA continues to work with the boroughs and schools to share best practice with others. The GLA has established several steering bodies and advisory groups to ensure a user-centred approach to strategy and operational delivery. This in turn ensures that boroughs, schools and the GLA have had an opportunity to jointly identify and discuss issues during the lead-up to the scheme and its rollout. These groups include: the Partnership Advisory Group, and task-and-finish groups (evaluation and monitoring, schools, and grant management).

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

- regular written updates
- task and finish groups
- roundtables
- regular one-to-one meetings with all boroughs
- meetings with headteachers
- meetings with London Councils
- meetings with the London Food Board
- Partnership Advisory Group⁷¹
- insight work, which is also included as part of the monitoring and evaluation work funded and delivered by external partners
- informal borough intelligence gathering, including via a survey
- in-depth interviews with schools

⁷¹ The Partnership Advisory Group is an advisory group which provides guidance and expert input into the development and implementation of the UFSM policy. Members include representatives (senior officers e.g., Directors of Education) from each of the 33 boroughs across London.

- public polling and insights work
- knowledge sharing with boroughs/schools via webinars
- resource sharing on webpages
- one-to-one meetings with nominated borough leads
- discussions at existing borough forums, such as ADPH leads network, etc.

In addition, a lived experience evaluation by CPAG and Reconnect London, gathering the experiences of children, families and schools, was published in November 2024.⁷²

⁷² IoUH, More than a meal: An independent evaluation of universal primary free school meals for children in London, November 2024

Assessment of the UFSM policy

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

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

Key to IIA scoring:

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

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

Where the assessment identifies likely adverse effects, measures have been suggested that could avoid or reduce this effect.

Assessment outcomes – equality impacts

IIA topic and objectives	Guiding questions	Score
Population and equality Enhance equality and social inclusion.	Does the policy ensure that nutritious food is provided, and that it meets the dietary needs of all cultures, religions and ethnicities in London?	+
	Does the policy help to reduce stigma around receipt of FSM?	+
	Does the policy ensure no reduction in FSM uptake or pupil premium registration by those that meet the current government criteria for FSM?	+

IIA topic and objectives	Guiding questions	Score
	Does the policy support the most vulnerable in society?	+
	Does the policy enable those whose families are currently undocumented, due to their immigration status, and/or with NRPF, to benefit from FSM?	+

Equality impacts – key factors underpinning scoring outcomes

As the offer is universal, there will be less stigma around children claiming the government offer for FSM. The year one evaluation has reached the following findings:

- UFSM helps to tackle child poverty, with a disproportionately positive impact for families on lower incomes, alleviating hunger and freeing money for household essentials.
- It breaks down barriers to opportunity: children are more ready to learn, and school-family relationships are improved by reducing dinner money debt.
- It supports ambitions to create the healthiest generation of children ever by improving nutrition – especially for families living on low incomes with less access to the food they need to thrive.⁷³
- Following the year one EqIA, a contingency funding pot was established in 2023-24 and 2024-25. This aimed to support specific access requirements for some groups of children, in certain extraordinary and specific circumstances, in relation to the Mayor's UFSM programme. It was used to address unforeseen issues, experienced by schools and boroughs, in implementing the policy – with these issues potentially inhibiting their participation. This pot is available to all LAs in London, based on evidence of need. Specifically, the funding has been used to support the following:
 - Needs that may impede take-up among individuals with protected characteristics, such as those related to dietary requirements linked to specific faith needs.
 - Access requirements in boroughs, including specific needs related to individuals with protected characteristics – affecting, for example, pupils with SEND. This includes additional funding to meet exceptional costs arising for special schools as a result of the policy, such as a higher price per meal or specialist equipment.
- Year two of the policy incurred many fewer implementation issues, as these were largely resolved in year one. The UFSM grant principles commit to ensuring that food is culturally appropriate, in line with the national school food standards.
- Throughout the programme, monitoring of UFSM uptake by ethnic and religious groups can provide useful information on whether school food provision is meeting dietary needs for children with different beliefs.

⁷³ IoUH, More than a meal: An independent evaluation of universal primary free school meals for children in London, November 2024

- The year one independent evaluation noted the mitigations put in place against the risk of inequitable take-up by the GLA. However, one in four parents (26 per cent) surveyed asked for more options that meet their child's dietary, religious and cultural requirements. The report indicates that more work needs to be done so that all children have equitable access to filling, healthy school food, by ensuring:
 - the food on offer, how it is presented, and the support provided to eat it are appropriate for pupils with SEND in both mainstream and special schools
 - there is enough choice and variety for children with faith-based requirements, to enable them to take up a meal every day and to improve their enjoyment of school lunches
 - school meals are culturally appropriate to reflect the diversity of local school communities
 - parents have clear information on how school meals meet their children's specific dietary requirements.
- Evaluators found many examples of school practices that can help in this area – from headteachers being included in decisions about school food, to the involvement of expert chefs and giving families more of a say in school meals.
- Schools receive pupil premium funding for children who qualify for FSM. This is estimated at £1,480 per year, for every child registered.
- Pupil premium application analysis in May 2024 showed there has not been a significant shift in the city average this academic year, since the UFSM scheme was introduced. However, there are some fluctuations at a borough level: 15 boroughs saw an increase in pupil premium applications; 18 boroughs saw a decrease.⁷⁴
- In March 2025 transitional protections ended; these were in place as part of the transition to Universal Credit. Under these transitional protections, pupils eligible for FSM on or since 1 April 2018 continued to receive FSM until 31 March 2025, or until their phase of education ends – whichever was later. This was the case even if their household was no longer eligible under the benefits/low-earnings criteria. However, those applying for FSM on or after 1 April 2018, who are were in receipt of Universal Credit and had earnings above the earned income threshold, were not eligible for FSM. With the end of transitional protections, the implication is that many families will need to reapply for pupil premium, when they otherwise would have not done so. Failure to do so could impact school budgets.
- The GLA is proactively helping boroughs to inform schools about this change. The GLA will also continue to monitor uptake of pupil premium applications. This includes uptake of national FSM since the policy was implemented.
- The GLA is encouraging boroughs in adopting approaches to universal registration. This will mitigate the risk of a drop in FSM registration, and will be a requirement for year three of the Mayor's UFSM grant funding. In year two, the GLA gave each borough £20,000 to support the adoption of auto-enrolment processes. This effectively removes the barrier for families to apply for pupil premium, and automatically enrolls them for pupil premium if they are eligible. Through this,

⁷⁴ DfE, Pupil premium: allocations and conditions of grant 2024 to 2025, 22 February 2024 – updated 17 March 2025

boroughs have identified many more families who are eligible for pupil premium, and who were otherwise not enrolled or benefitting from pupil premium.

- Historically, families who were undocumented due to their immigration status, and/or with NRPF, were not entitled to FSM. However, a scheme to make FSM available to these families was introduced during COVID-19. In January 2023, this scheme was made permanent.
- Across all communications, information about UFSM to parents/families who do not have English as their primary language are translated to ensure accessibility.

Assessment outcomes – economic impacts

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

Economic impacts – key factors underpinning scoring outcomes

- The IIA assessment concludes that UFSM will bring significant financial relief for households who currently: do not meet FSM thresholds; and either pay for a school meal, or provide their child/children with a packed lunch. Estimates from the economic assessment undertaken as part of this updated analysis suggest that those households could save upwards of £500 per KS2 child in a school year. This would have positive effects for families experiencing food insecurity as a result of the cost-of-living crisis. The year one evaluation found the following:
 - Families across the income spectrum have been experiencing rising costs that have put a strain on their finances. The policy is easing this pressure, with 84 per cent of all parents surveyed claiming the policy has helped or significantly helped their household finances.
 - Families living on low incomes are benefitting the most from the additional financial support, with parents in receipt of Universal Credit more likely to say the policy was 'significantly helping' household finances (52 per cent compared to 31 per cent not receiving Universal Credit).
 - However, as UFSM only addresses one demand on family finances, the policy alone is not enough to help families who are dealing with rising costs, or who are consistently living on low incomes or in poverty.
 - The policy has near-resolved the issue of dinner money debt for primary schools and parents who were previously struggling to cover the cost of primary school meals in London. This has led to improved parent-school relationships, and reduced the administrative burden on school staff. It is another example of a specific benefit of the policy for families living on low incomes. However, historic dinner money debt remains a challenge in some schools, limiting the potential positive effect of the policy for some families.

- Findings suggest that benefits of the policy are felt strongest by families living on low incomes.⁷⁵
- The policy is a universal offer, not targeted at any income quintile. Data from the boroughs already offering UFSM showed an increase in overall take-up of school meals, rather than a decrease. Additionally, GLA monitoring of FSM uptake, in partnership with Arbor, indicated average uptake figures of above 85 per cent amongst pupils eligible for the Mayor's scheme.⁷⁶
- The overarching aim of the policy is to support families with the cost of living. As a result, the economic impact of the policy on families will be a key consideration of the policy evaluation. Understanding take-up of school meals for pupils across all income quintiles has also been built into the policy's monitoring and evaluation strategy.
- Regular engagement with schools and boroughs through the policy development and its implementation is set out earlier in this paper. This has been done through a range of mediums such as surveys, webinars and meetings. Lessons from boroughs and schools that already provide UFSM have been shared, and are available via the [GLA borough/school resource hub](#).
- The policy has built-in flexibility for schools to offer cold lunches, where there are significant challenges around kitchen facilities. Additional support has been offered to schools where old kitchen equipment is failing under the pressure of offering UFSM. The grant conditions specify that the GLA must be notified if any school chooses to opt out of delivering the policy.
- A contingency fund was established by the GLA to support any school experiencing significant implementation barriers in years one and two.
- The UFSM policy is anticipated to produce additional beneficial impacts on London's businesses and the wider London economy. The additional investment in school food will have a positive impact on caterers. The five boroughs in London already offering UFSM will have the opportunity to reinvest the funding to support families through the cost-of-living crisis.
- In some boroughs, the additional investment will result in increased workforce requirements. It will thus have a positive impact on local employment.
- An IoUH-commissioned report by PwC, published in November 2023, investigated the expansion of FSM across primary and secondary schools in London and England.⁷⁷ The report focused on the wider contribution stimulated by supply chain activities from expanding FSM, and focuses on 2024-30.
- The report found that the estimated gross value added (GVA) impact for UFSM provision, 2024-30, is £13.9bn in England and £2.1bn in London. For both London and England, the majority of the wider GVA generated through expanding UFSM provision comes from supply chain activities, mostly contributed by the food and beverage sector.

⁷⁵ IoUH, [More than a meal: An independent evaluation of universal primary free school meals for children in London](#), November 2024

⁷⁶ Arbor data.

⁷⁷ IoUH, [An Economic Contribution Analysis of Free School Meal Provision Expansion](#), November 2023

- It estimates that, by 2030, the number of full-time equivalent (FTE) jobs will rise by 40k in England and 5.2k in London. In both London and England, the majority of the wider FTE jobs supported through expanding UFSM provision is from the food and beverage, and wholesale trade sectors.
- The UFSM policy price per meal has been uplifted in year two of the policy, to reflect feedback on implementation from schools and boroughs in year one.
- The October 2024 food inflation projections developed by the OBR, for 2024-25, put inflation at 2.5 per cent.⁷⁸ To support UFSM delivery for the 2024-25 school year, the grant allocation per meal has increased from £2.65 to £3.00. This is at least 10 per cent higher than increasing the allocation to align with inflation, per the OBR's projection (which would increase the cost to £2.71 per meal).
- Latest research continues to show the success of UFSM schemes in alleviating household financial hardship and reducing food insecurity. An ISER study reported household savings of £41 every four weeks.⁷⁹ Another report highlighted reduced financial hardship and stress for families.⁸⁰ A 2023 article from BMC Public Health presents the findings of the evaluation of a pilot of a UFSM scheme in two secondary schools in London. The study found that the pilot increased access to a healthy meal; reduced food insecurity; improved nutrition; and generated some social benefits.^{81,82}
- Data analysis from the boroughs with a previous UFSM offer shows a reduction of £11.53 of supermarket food expenditure and £9.46 on eating out (Holford and Rabe, 2024). This suggests a shift of expenditure to non-food items.

Assessment outcomes – health impacts

IIA topic and objectives	Guiding questions	Score
Health and wellbeing Improve access to healthy food and reduce health inequalities.	Does the policy reduce inequalities in access to healthy food and reduce health inequalities?	+
	Does the policy promote consistency in standards of food quality/provision across the LBs?	+
	Does the policy create an environment that promotes healthy eating habits in children?	+
	Does the policy help to provide long-term physical health benefits for children, including a reduction in obesity levels?	+
	Does the policy promote good mental health and wellbeing in children by supporting a range of health determinants – such as access to	+

⁷⁸ OBR, Economic and fiscal outlook – November 2023, 22 November 2023

⁷⁹ ISER, The impacts of Universal Free School Meal schemes in England, February 2024

⁸⁰ Health, wellbeing and nutritional impacts after 2 years of free school meals in New Zealand, Health Promotion International, Volume 38, Issue 4, August 2023, daad093, <https://doi.org/10.1093/heapro/daad093>

⁸¹ A qualitative process evaluation of universal free school meal provision in two London secondary schools, Jessiman, P.E., Carlisle, V.R., Breheny, K. et al. BMC Public Health 23, 300 (2023). <https://doi.org/10.1186/s12889-023-15082-3>

⁸² IFS, The policy menu for school lunches: options and trade-offs in expanding free school meals in England, 29 March 2023

IIA topic and objectives	Guiding questions	Score
	healthy food, social participation, interaction and support, and high-quality diet and nutrition?	
	Does the policy promote good mental health and wellbeing in parents and carers by supporting a range of health determinants such as access to healthy food, social participation, interaction and support, and high-quality diet and nutrition?	+
Social cohesion and inclusive design Improve social cohesion and inclusion and reduce health inequalities and stigma.	Does the policy improve social cohesion and inclusive access to a good standard of food for all children in primary schools?	+
	Does the policy reduce health inequalities and stigma?	+
Education and skills Improve educational attendance and attainment.	Does the policy help improve school attendance?	0
	Does the policy help to improve educational attainment?	+

Health impacts – key factors underpinning scoring outcomes

- It is expected that the universal offer provided through the policy will improve social cohesion and inclusion, and tackle health inequalities.
- Through grant conditions attached to LA funding of the policy, boroughs are requested to adhere to national school food standards. To aid this, the price per meal was increased in years two and three to support the provision of nutritious meals and to account for feedback on implementation from schools and boroughs in year one.
- The year one evaluation made the following findings:
 - The policy has had a positive effect on the mental wellbeing of children and parents living on low incomes, by reducing the emotional burden and stress of trying to provide an adequate school lunch. More than one in three parents (35 per cent) said their child had become less worried about food at school.
 - The policy is supporting children's nutrition by:
 - increasing the proportion of children taking a school meal rather than packed lunch
 - freeing up money that parents can spend on 'better' and 'healthier' food at home – 60 per cent of parents were able to spend more money on food for their family as a result of the policy

- encouraging children to try new foods at school – 55 per cent of parents thought their child was trying new foods because of the policy, increasing to 63 per cent for families in receipt of Universal Credit.

Findings suggest that benefits of the policy are felt strongest by families living on low incomes.

- The policy is contributing to a calmer start to the school day for families across the income spectrum. It ensures children arrive at school more ready to learn; and, in some cases, supports parents to get to work on time.
- Children, school staff and parents all spoke about children's improved energy levels and ability to concentrate due to having a school lunch, with this again supporting children's readiness to learn. More than a third of parents (34 per cent) felt that UFSM means their child can concentrate better on school and lessons.
- Parents, school staff and children viewed the policy as a leveller, supporting a sense of fairness and happiness at school. More than one in three parents (35 per cent) felt that their child enjoyed school more since the policy had been in place.
- On pupil health, new evidence from ISER,⁸³ CPAG and NEU⁸⁴ shows that FSM can have a positive effect on child obesity rates, eating habits, improved home-school relationships and uptake amongst pupils eligible for government FSM.

Assessment outcomes – environmental impacts

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

⁸³ ISER, The impacts of Universal Free School Meal schemes in England, 15 February 2024

⁸⁴ CPAG, The universalism multiplier, 12 December 2023

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

Environmental impacts – key factors underpinning scoring outcomes

- It is unknown whether increased deliveries to schools will have a negative impact on air quality. This is because, according to boroughs involved in the IIA workshops, deliveries are likely to be larger, rather than more frequent. This should be monitored as part of the policy evaluation.
- The baseline data on which the IIA was developed – and the UFSM policy itself – have not materially shifted in the context of the scheme extension.
- The recent government ban on single-use plastics, and the Extended Producer Responsibility scheme, both have implications for manufacturing and school caterers.⁸⁵
- Given the diversity of local catering provision, it is also unknown whether there will be changes to emissions through production, manufacture and preparation of food. It is likely that any such changes would also occur outside London.
- The contracts with caterers are held by local boroughs, not the GLA. Therefore, catering arrangements cannot be directly assessed against the GLA policy.
- Approximately 72g of food waste is produced per primary school pupil, per year, across England. Accordingly, this assessment has found there is potential for more waste generation from uneaten food, as a result of UFSM.
- However, this is the first policy of its kind to be delivered at such scale – the degree and scale of additional food waste at this stage remains unknown, but will be explored further with the boroughs.

⁸⁵ Defra, Consistency in household and business recycling in England - consultation outcome: Government response, 21 November 2023

Summary findings and recommendations

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

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

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

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

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

The scheme will have positive effects on the health and wellbeing of the children and their wider families. The year one evaluation found that the policy has: had a positive effect on the mental wellbeing of children and parents living on low incomes; supported children's nutrition; and led to improved energy levels and ability to concentrate among pupils.

Parents, school staff and children viewed the policy as a leveller, supporting a sense of fairness and happiness at school. More than one in three parents (35 per cent) surveyed felt that their child enjoyed school more since the policy had been in place. Similarly, a recent research study from NEU and CPAG found that the shared experience of universal provision fosters a sense of togetherness, and reduces feelings of exclusion.

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

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

Summary by assessment

EqlA

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

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

The funding uplift to Jewish state-funded schools and SEND has now been built into the main funding formula for year three.

Below is a summary of the key findings:⁸⁶

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

⁸⁶ To review the full EqlA and baseline data on protected characteristics, see Annex B.

higher price per meal for kosher food. The GLA continues to work with boroughs to monitor provision of halal and faith-based diets suitable food.

- Additional groups, such as those with caring responsibilities and lone parents, may disproportionately benefit from the financial relief provided by this proposed policy.

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

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

London's people (incorporating the HIA and EqIA)

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
What are the impacts of UFSM on stigma and social inclusion?	<p>Universal provision should reduce the stigma around receipt of FSM – children will no longer be identified as coming from poorer families.</p> <p>FSM is found to be higher amongst ethnic minority groups.⁸⁷ UFSM should bring benefits for greater inclusion and reductions in social segregation.</p>	<p>The UFSM policy and baseline data against which the IIA was assessed have not materially shifted since publication of the IIA in autumn 2023.</p> <p>Year one findings, along with the GLA's ongoing monitoring, suggest that children enjoy UFSM for the sense of equality that comes with sitting down to the same meal. The recent research study by NEU and CPAG found that the shared experience of universal provision fosters a sense of togetherness, and reduces feelings of exclusion.⁸⁸</p>	<p>Continue to monitor uptake of UFSM according to pupil demographics and government eligibility.</p>
What impacts will UFSM have on access to the	<p>Those who may currently be eligible for government FSM, but are not taking it up, will</p>	<p>The original findings of UFSM's impacts on access to government FSM have not materially shifted since</p>	<p>Continue to work with boroughs to offer schools and parents guidance for completing forms in</p>

⁸⁷ DfE, Academic year 2023/24: Schools, pupils and their characteristics, 6 June 2024

⁸⁸ CPAG, The universalism multiplier, 12 December 2023

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
government FSM scheme?	<p>automatically receive UFSM. This is expected to remove barriers to access for those who may find it harder to fill in the required forms (including those with lower levels of literacy and/or fluency in English), and those who are unaware of their rights.</p> <p>This would disproportionately include those from ethnic minority and/or migrant groups,⁸⁹ as well as single-parent⁹⁰ and disabled households.⁹¹ This has direct benefits for reducing health inequalities across different sectors of society, and enabling access to healthy food.</p>	<p>publication of the IIA in autumn 2023.</p> <p>In addition to the original findings of the IIA assessment, recent research from ISER highlighted an increased uptake amongst pupils who were previously not taking government FSM, despite being eligible for the scheme.⁹²</p>	<p>relation to pupil premium.</p> <p>Support improved awareness, among boroughs and schools, of the strengthened government guidance on reasonable adjustments for pupils with SEND. This follows the Schools Minister's commitment, in January 2023, to update FSM guidance.</p> <p>Continue to support boroughs in establishing clear communications to schools on the ongoing need for registration with the government scheme.</p> <p>Continue to monitor uptake according to pupil profile, which includes eligibility for the government FSM scheme.</p> <p>Monitor the impact of the additional grants given to boroughs. These are to support efforts around auto-enrolment in year two; and making adoption of universal registration approaches</p>

⁸⁹ Trust for London, [London's Poverty Profile](#), 2023

⁹⁰ ONS, Household composition, 2021

⁹¹ DfE: Explore education statistics, [Special educational needs in England](#), 2023

⁹² ISER, [The impacts of Universal Free School Meal schemes in England](#), February 2024

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
			mandatory in year three.
What will the impacts of UFSM be on pupil premium income for schools?	<p>The impact on pupil premium rates was originally unknown. There is potential for UFSM to increase uptake of the national offer via communication with parents.</p> <p>However, there is a risk that UFSM could reduce the number of sign-ups among those eligible for means-tested FSM – which could potentially impact on pupil premium. This could have potential repercussions for the school’s financial resources.</p>	<p>The potential for positive and adverse impacts, as related to pupil premium, remain the same for the scheme extension, which is similar in scope to years one and two.</p> <p>In analysis of pupil premium applications in May 2024, no change was found at the London level since the introduction of the Mayor’s scheme. However, boroughs experienced varying changes to pupil premium applications.⁹³</p> <p>The removal of transitional protections in 2025 may lead to a significant decrease in pupil applications.</p>	<p>The GLA will keep convening boroughs to support adoption of auto-enrolment, enabling all pupils to register for UFSM. Auto-enrolment would ensure that all those eligible for pupil premium receive government financial support.</p> <p>Boroughs will be required, through a grant condition in Year 3, to have implemented an approach to universal registration ahead of October 2025 census day. This is to further protect pupil premium grant income for schools.</p> <p>The GLA will continue to work with partners to monitor uptake of pupil premium over the course of the pilot year. This should include uptake of national FSM since the policy was implemented.</p> <p>Continue to monitor the national government FSM and pupil premium data, published annually,</p>

⁹³ DfE, [Pupil premium: allocations and conditions of grant 2024 to 2025](#), 22 February 2024 – updated 17 March 2025

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
			following removal of transitional arrangements.
What are the projected impacts of UFSM on families who do not meet the threshold for the government FSM scheme?	<p>Those living in relative poverty, but not currently qualifying for FSM, should be able to benefit from the financial relief provided by UFSM.</p> <p>This is particularly important in London where the cost of living is higher, in terms of on-the-shelf food prices and other costs, such as rents.⁹⁴</p>	<p>The UFSM policy and its wider framework (i.e., the ongoing cost-of-living crisis) have not materially shifted in the context of the scheme.</p> <p>The government is not currently expected change its FSM eligibility criteria for the 2025-26 academic year. Therefore, the benefits of universal provision are expected to continue throughout the scheme.</p> <p>To date, ongoing GLA monitoring suggests that families who are taking up UFSM, but are not eligible for government FSM, experience positive cost savings and wellbeing impacts.</p>	The GLA will continue to monitor impacts on families according to social economic grade and household income, where possible.
What are the impacts of UFSM on pupil wellbeing and behaviour?	<p>There are many studies referencing the positive impacts of UFSM on pupil wellbeing, as identified in the Theory of Change Systematic Literature review for years one and two.</p>	<p>The UFSM policy has not materially shifted in the context of the scheme extension, and so the benefits on pupil health and wellbeing are expected to continue.</p> <p>Recent research from CPAG and NEU highlights improved nutrition and home-school relationships; changed eating habits, relationships; and</p>	

⁹⁴ Trust for London, London's Poverty Profile, 2023

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
		<p>higher uptake amongst government-eligible pupils.⁹⁵</p> <p>The year one evaluation showed that the UFSM policy had a positive effect on the health and wellbeing of children and their families.⁹⁶</p> <p>The independent evaluation of year one showed positive shifts in children's behaviour, concentration, and energy levels during the school day.⁹⁷</p>	
What are the projected impacts of UFSM on wider household benefits?	<p>UFSM should bring benefits for family members, including other children, living in households with children who would qualify for FSM.</p> <p>They may benefit from more money being available to spend on food and necessities for other children in the household, including pre-schoolers and older siblings.</p>	<p>The UFSM policy has not materially shifted in the context of the scheme extension, and so the benefits on the wider household are expected to continue.</p> <p>To date, ongoing monitoring indicates cost savings of £15 per week (or £60 per calendar month), which helps families to buy food at home; and/or make healthier and lighter food choices in the evening, which is cheaper.</p> <p>Insights gathered in year one of the UFSM policy, published in the year one independent</p>	This should continue to be monitored and evaluated.

⁹⁵ CPAG, [The universalism multiplier](#), 12 December 2023

⁹⁶ IoUH, [More than a meal: An independent evaluation of universal primary free school meals for children in London](#), November 2024

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

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
		<p>evaluation showed the following:</p> <p>1) Parents, whatever their household income, welcomed the policy and wanted it to continue. They felt it countered the effects of the rising cost of living; and, in many cases, had a positive impact on family life.</p> <p>2) Policy is easing pressures on family finances, for households across the income spectrum.</p> <p>3) It is having the biggest impact on families who have been the most constrained by rising food, energy and housing costs.</p> <p>4) The policy has significantly helped to address the problems caused by dinner money debt, and in some cases has transformed the relationship between parents and schools.⁹⁸</p>	
Will the UFSM policy meet the dietary requirements of all faith groups?	UFSM grant principles stipulate that boroughs must ensure that food is culturally appropriate, in line with national school food standards.	The UFSM policy has not materially shifted in the context of the scheme extension, and so the projected impacts on dietary needs are expected to continue.	Jewish state schools to continue to receive an additional 85p uplift on the £3.00 price per meal in year two (£3.85 in total), in response to ongoing

⁹⁸ IoUH, More than a meal: An independent evaluation of universal primary free school meals for children in London, November 2024

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
	<p>Ongoing stakeholder engagement and the EqlA showed that, while boroughs and schools currently support a range of needs, certain faith-related dietary requirements (e.g., kosher food) would incur additional costs.⁹⁹</p>	<p>Early insights of UFSM uptake by ethnic and religious group suggests that school food provision is broadly meeting dietary needs for children with different beliefs. However, the programme will continue to capture insights on this, including where schools may be facing challenges in providing a halal offer.</p>	<p>higher costs of kosher meals.</p> <p>Consideration could be given of how to support schools and caterers to promote vegetarian and fish options, to suit a greater range of cultural/faith needs. However, this decision will be taken via local commissioning contracts and school policy.</p> <p>There will be further research into different cultural and faith-based dietary requirements. The first piece of research, investigating needs for those with halal diets, will be commissioned in spring 2025.</p> <p>There will be continued work to ensure that guidance is available to boroughs on communicating to undocumented families; and that information is available in different languages.</p> <p>Continue to monitor uptake of UFSM, by ethnic and religious group.</p>

⁹⁹ GLA, UFSM Integrated Impact Assessment (IIA) and Equalities Impact Assessment (EqlA)

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
Is UFSM expected to improve health for those experiencing food insecurity?	<p>UFSM should improve the health of those currently experiencing food insecurity by ensuring at least one nutritious meal a day. This would bring benefits for children's growth and development, and mental health and wellbeing.¹⁰⁰</p> <p>It is also anticipated that the scheme would bring about positive mental health benefits for recipients and their families from reducing concerns about food insecurity.¹⁰¹</p>	<p>The UFSM policy has not materially shifted in the context of the scheme extension, and so the projected impacts on health are expected to continue.</p> <p>To date, early insight suggests children receiving a full, nutritious meal at lunchtime diminishes the mental load on parents/carers. This not only positively impacts mental wellbeing, but also reduces worries about meeting children's nutritional needs.</p> <p>In a recent ISER study, evidence suggests a positive improvement on obesity levels amongst children.¹⁰²</p> <p>In the IoUH year one evaluation, three in five parents surveyed (60 per cent) said they were able to spend more money on food for their family, as a result of the policy.</p> <p>In the study, pupils, parents and school staff all reported that more children were trying and enjoying new foods at school.</p>	<p>The GLA will consider convening boroughs on food standards, and share insights with DfE about areas for improvement in the national school food standards.</p> <p>Given the longer timeframe for the scheme, consideration could be given to the scheme's impact on wider health issues – such as child healthy weight and whether this could be incorporated into the monitoring and evaluation strategy for years two and three.</p>

¹⁰⁰ Relationship between diet and mental health in children and adolescents: a systematic review. *American Journal of Public Health*, 104(10).

¹⁰¹ Cain, Kathryn S et al. "Association of Food Insecurity with Mental Health Outcomes in Parents and Children." *Academic pediatrics* vol. 22,7 (2022).

¹⁰² ISER, The impacts of Universal Free School Meal schemes in England, February 2024

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
		<p>More than half of all parents surveyed (55 per cent) thought their child was trying new foods because of the policy, increasing to 63 per cent of parents in receipt of Universal Credit. Better food at home, and a more varied diet at school, can contribute to improved health. Parents also reported having more money available to spend on activities that support children's health beyond food – for example sports clubs, which help children to be physically active.</p>	
<p>Is the UFSM policy expected to meet food standards?</p>	<p>The grant principles and conditions for year one state that provision of school meals should meet national food standards and should improve awareness of healthy eating and positive eating habits. These standards are set by national government.</p>	<p>As part of the grant principles for year three, the scheme extension will continue to stipulate that UFSM provision should meet national food standards.</p>	<p>The GLA will consider opportunities to promote better education and engagement around nutrition and different food types. This would encourage all students to embrace healthy eating habits; and reduce unfamiliarity with produce, and therefore waste. This is in alignment with the Healthy Schools London awards programme.</p> <p>Although responsibility for meeting food standards sits with schools, the GLA will continue to monitor any trends or issues</p>

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
			related to food quality, should these arise.

London's economy (incorporating the EclA)

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
What are the projected impacts of UFSM on financial savings for London families?	UFSM should bring significant financial relief for households that currently do not meet the government's FSM thresholds; and either pay for a school meal, or provide their child or children with a packed lunch. ¹⁰³	<p>Given food inflation projections,¹⁰⁴ the policy will continue to have positive effects for families who are experiencing food insecurity, or cannot provide a healthy meal option for their children, as a result of the cost-of-living crisis.</p> <p>Recent estimates suggest that households could save up to £1,000 per child over two years.</p> <p>The year one evaluation showed that parents, whatever their household income, welcomed the policy and wanted it to continue. They felt it countered the effects of the rising cost of living; and, in many cases, had a positive impact on family life.</p>	To continue as a core focus for the monitoring and evaluation strategy.
What are the projected impacts of UFSM on London's wider economy?	The original grant principles stipulate that boroughs and schools should consider the London Living Wage. This suggested positive impacts	<p>Grant conditions for the scheme will continue to take consideration of the London Living Wage into account.</p> <p>Moreover, new evidence corroborates the findings of the original IIA.</p> <p>According to modelling by IoUH and PwC, expanding</p>	Continue to monitor adherence to grant conditions and uptake of grant principles.

¹⁰³ CPAG, [By region: number of children in poverty not eligible for free school meals](#), 1 September 2022.

¹⁰⁴ OBR, [Economic and fiscal outlook – October 2024](#), 30 October 2024

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
	<p>on those working in the catering system within schools.</p> <p>In some areas, the enhanced offer should create new employment opportunities for local people.</p>	<p>FSM provision in London would stimulate strong economic benefits over time, including supporting over 5,000 FTE jobs in the city by 2030.¹⁰⁵</p> <p>Investing in UFSM is also likely to boost London's GVA (i.e., output) in the medium to long term.</p> <p>For example, the IoUH/PwC analysis reveals that expanding UFSM across London could generate an additional £2.1bn in output between 2024 and 2030.¹⁰⁶</p> <p>Most of the new jobs supported by UFSM expansion will be generated in the food and beverage industry (2,650 additional jobs, or 51 per cent of the total). Of the rest, 15 per cent are expected to be in the wholesale trade industry (750 additional jobs).¹⁰⁷</p>	
What are the projected impacts of UFSM on savings to NHS?	<p>UFSM provision should generate improved health and nutritional outcomes. This, in turn, would generate savings to the NHS and (more broadly) the Exchequer, over time.¹⁰⁸</p>	<p>In 2022, IoUH estimated that improved health outcomes from UFSM expansion would save the NHS £12m from reduced obesity. The cost savings are likely to be higher for 2024-25 and 2025-26.</p> <p>Recent research highlights positive impacts on obesity levels in children.¹⁰⁹</p>	<p>Consider evaluating how the scheme is contributing to a whole-system approach to supporting child healthy weight in London, and subsequent improved health outcomes.</p>
What are the projected	<p>Expanding UFSM is likely</p>	<p>In 2022, IoUH estimated that UFSM expansion would</p>	<p>Continue to support independent</p>

¹⁰⁵ IoUH, [Expanding free school meals: Exploring the wider economic benefits](#)

¹⁰⁶ IoUH, [Expanding free school meals: Exploring the wider economic benefits](#)

¹⁰⁷ IoUH, [Expanding free school meals: Exploring the wider economic benefits](#)

¹⁰⁸ Food for Life, [Summary of evidence in support of Universal Free School Meals](#)

¹⁰⁹ ISER, [The impacts of Universal Free School Meal schemes in England](#), 15 February 2024

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
impacts on improved lifetime earnings?	<p>to lead to improved educational outcomes for children, which would (all other things being equal) enhance their potential lifetime earnings.</p> <p>In turn, this would boost future consumer spending and London's overall GVA/output.</p>	<p>increase the lifetime earnings of children by £18.5bn due to improved educational attainment.</p> <p>Recent research from ISER evidence an improvement in reading scores.¹¹⁰</p>	<p>evaluations measuring learning outcomes.</p>
What are the projected impacts as a result of inflation?	<p>Original concerns included whether schools may have to either change menus (e.g., reduce options, or provide more cold meals); reduce portion size; or use their own money to top up the meal price. However, the price per meal offered by the GLA in its first year was higher than the national government rate. In December 2024, the national</p>	<p>These projections (from the October 2024 Budget) reveal that food price inflation is projected to be 2.5 per cent – lower than projections made for the 2023-24 school year. This is in line with broader lower inflation expectations by various agencies, including the OBR and the Bank of England.</p> <p>For the 2025-26 academic year, the grant allocation per meal rose from £2.65 to £3.00. It will remain at the higher price per meal of £3.00, with a top-up given to Jewish state-funded schools, due to the evidence showing a higher cost.</p> <p>The meal price increase goes beyond the food inflation projections developed most recently by the OBR for 2024-</p>	<p>To continue to monitor for future years.</p> <p>Although responsibility for meeting food standards sits with schools, the GLA will continue to monitor any trends or issue related to food quality should these arise.</p>

¹¹⁰ ISER, [The impacts of Universal Free School Meal schemes in England](#), February 2024

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
	<p>government announced an increase of 5p for UIFSM to £2.58.</p> <p>As part of the UIFSM policy development, an assessment across LBs indicated that a set price per meal was in line with, or above, boroughs' set contract price points.</p>	25 (which would take the price per meal to £2.71).	
What are the projected impacts on school capacity and infrastructure to roll out UIFSM?	<p>In year one of the policy, the lack of capital funding was a concern for some schools.</p> <p>In year two some schools reported that longstanding issues with old kitchen equipment were worsened by the added pressure on the kitchens from UIFSM.</p> <p>In years one and two, a contingency fund was set up to provide extra support to any school experiencing implementation issues.</p>	<p>The UIFSM funding is for delivery of the school food.</p> <p>Ongoing engagement with schools and boroughs has highlighted where there are any particular challenges, and the GLA and boroughs provided support as needed.</p> <p>Moreover, boroughs were funded based on 2022 census calculations, which provided extra funding for the 2023-24 academic year. The GLA also developed a programme to award kitchen equipment to schools via application in year two.</p> <p>Flexibility has been built into the grant principles for cold meal provision – this should facilitate the provision of UIFSM for any school with kitchens that cannot cope with increased demand of hot meals.</p>	<p>The GLA to consider, alongside boroughs, whether there could be a benefit in collaborative working to drive cost savings through contracting.</p> <p>The GLA to continue to monitor capacity and infrastructure-related challenges throughout year three.</p>

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
	<p>According to the year one evaluation, 94 per cent of schools surveyed had a kitchen with capacity to produce meals for all children. However, it also found that some schools had outdated kitchen equipment that needed replacing or upgrading, to enable effective delivery of the policy. Efforts were made by some boroughs, and the GLA, to provide resources to address this need. Only 12 per cent of schools in the survey reported receiving additional funding to support implementation; and 69 per cent of these received said funding from their borough.</p>		

London's environment (incorporating the SEA)

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
What are the projected impacts of UFSM on air quality?	<p>It is unknown whether increased deliveries to schools will have a negative impact on air quality. This is because, according to boroughs involved in the IIA workshops, highlighted deliveries are likely to be larger, rather than more frequent.</p> <p>Given the diversity of local catering provision, it is also unknown whether there will be changes to emissions through production, manufacture and preparation of food. It is likely that any implications would also occur outside London.</p>	<p>The UFSM policy has not materially shifted in the context of the scheme extension – however, measures could be taken to develop a better understanding of impacts in this area.</p>	<p>The GLA will continue to use its convening powers to understand best practice, and share this with boroughs and schools.</p>
What will the impact of the UFSM policy be on waste, including food waste and single-use plastic?	<p>Approximately 72g of food waste is produced per primary school pupil, per year, across England.¹¹¹</p> <p>Accordingly, the IIA found there is potential for more waste generation</p>	<p>The baseline data on which the IIA was developed – and the UFSM policy itself – have not materially shifted in the context of the scheme continuing.</p> <p>Recent research, assessing the impact</p>	<p>Work to explore sustainable procurement and managing waste could be undertaken with boroughs.</p>

¹¹¹ WRAP, Food waste in schools, 2011.

Policy topic	Original policy assessment	Implications for ongoing policy	Updated recommendations for policy
	<p>from uneaten food, as a result of UFSM.</p> <p>The London Borough Food Group could convene and share good practice, including efficient ways to manage waste and order food.</p>	<p>of a school lunch programme, highlighted that low uptake created food waste.¹¹²</p> <p>The recent government ban on single-use plastics, and the Extended Producer Responsibility scheme, have implications for manufacturing and school caterers.¹¹³</p>	
What are the projected impacts of UFSM on climate change and greenhouse gas emissions?	<p>The impacts of UFSM provision on changes to emissions through production, manufacture and preparation of food are largely unknown.</p> <p>The London Borough Food Group continues to convene and share good practice – including efficient ways to reduce environmental impacts and manage waste.</p>	<p>Contracts with caterers and/or suppliers will continue to be held by the boroughs as part of the UFSM policy, and cannot be directly assessed.</p>	

Monitoring insight and impact

The overarching aim of the policy is to support families with the cost of living. Thus, the economic impact of the policy on families will remain a key consideration of the policy

¹¹² [Health, wellbeing and nutritional impacts after 2 years of free school meals in New Zealand](https://doi.org/10.1093/heapro/daad093), Health Promotion International, Volume 38, Issue 4, August 2023, daad093, <https://doi.org/10.1093/heapro/daad093>

¹¹³ Defra, [Consistency in household and business recycling in England - consultation outcome: Government response](#), 21 November 2023

evaluation. Understanding take-up of FSM for pupils across all income quintiles will remain integral to the policy's monitoring and evaluation strategy.

The monitoring and evaluation strategy for years two and three should be driven by the Theory of Change; the latest emerging evidence from the literature; and the findings from the independent evaluation of year one.

Recommendations for monitoring

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

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

	<p>Impact on food waste and packaging, linked to production, manufacturing and supply</p> <p>Impact on energy use</p>
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Longer-term policy and implementation recommendations:

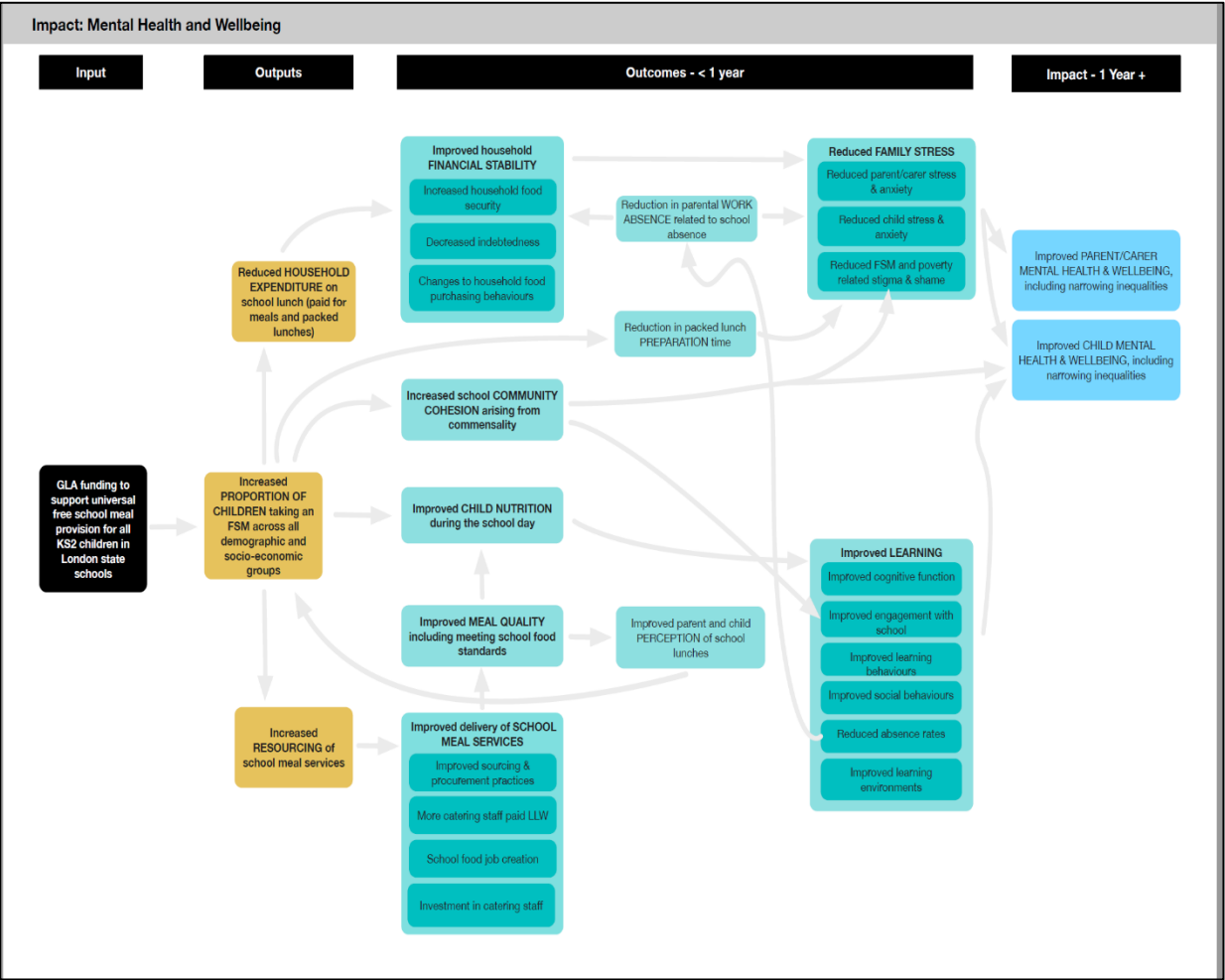
In considering any future iterations of the policy, the following recommendations could be taken into account:

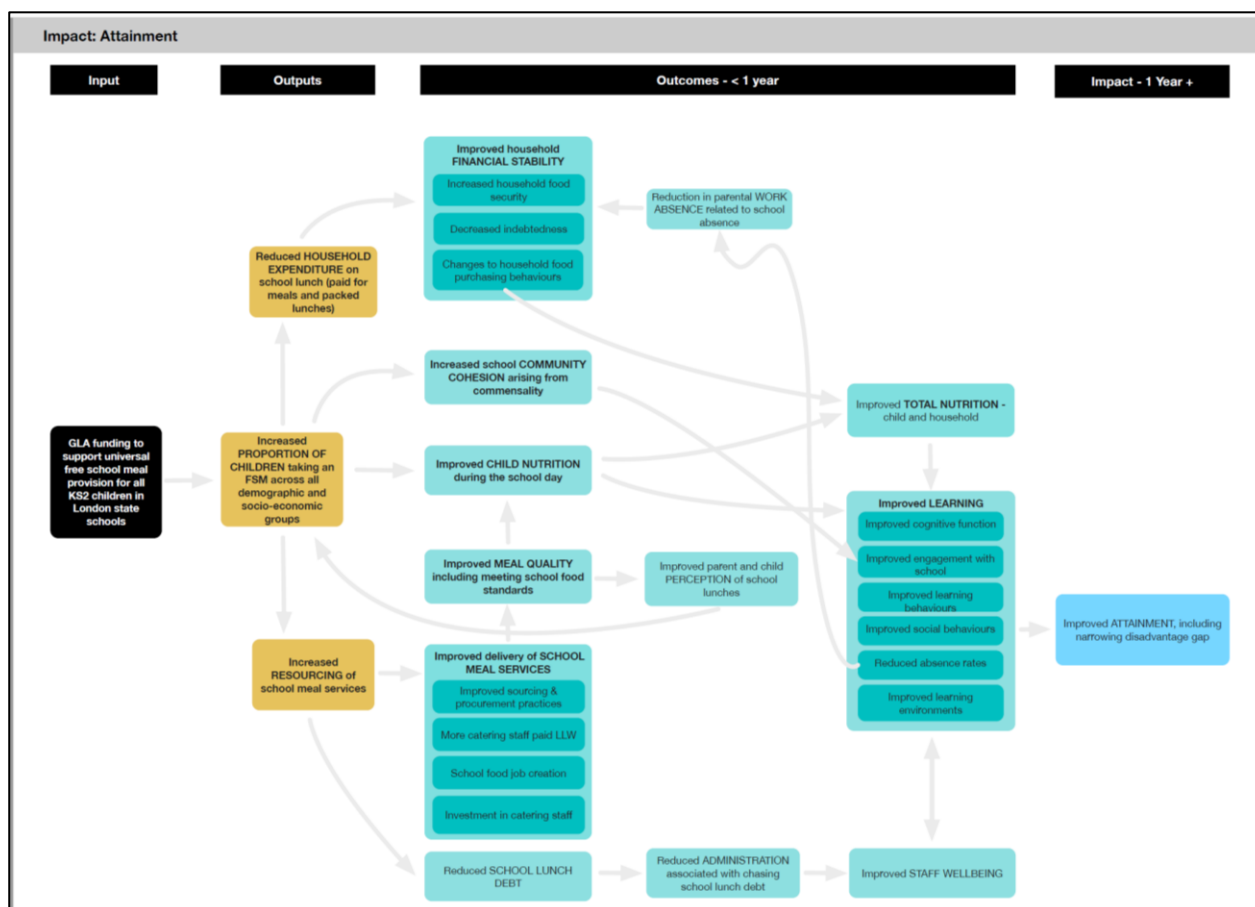
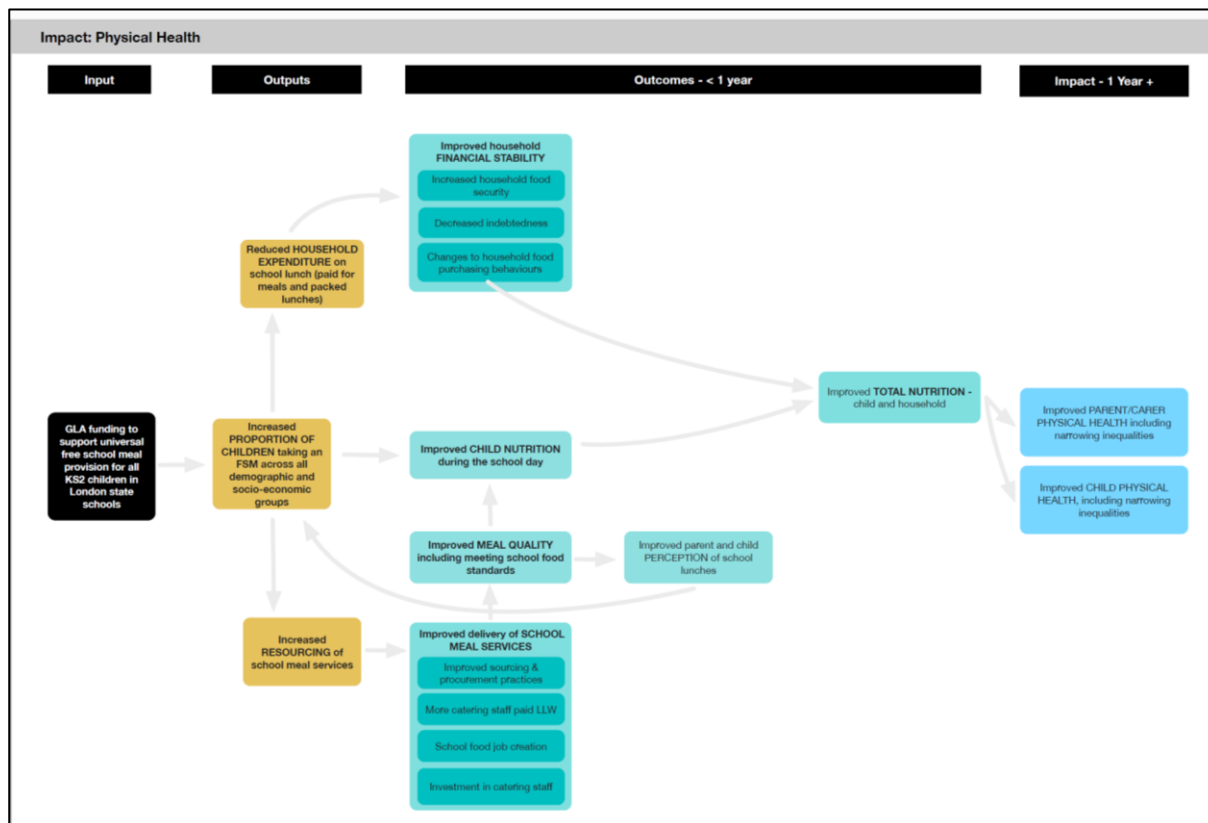
- Learning from monitoring and insights from years one and two – including where boroughs/schools have a slow uptake rate; the impact of the scheme on pupils and families; and the impact of the scheme on schools, including staffing and resource. Continuing to draw on GLA insight gathered and independent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

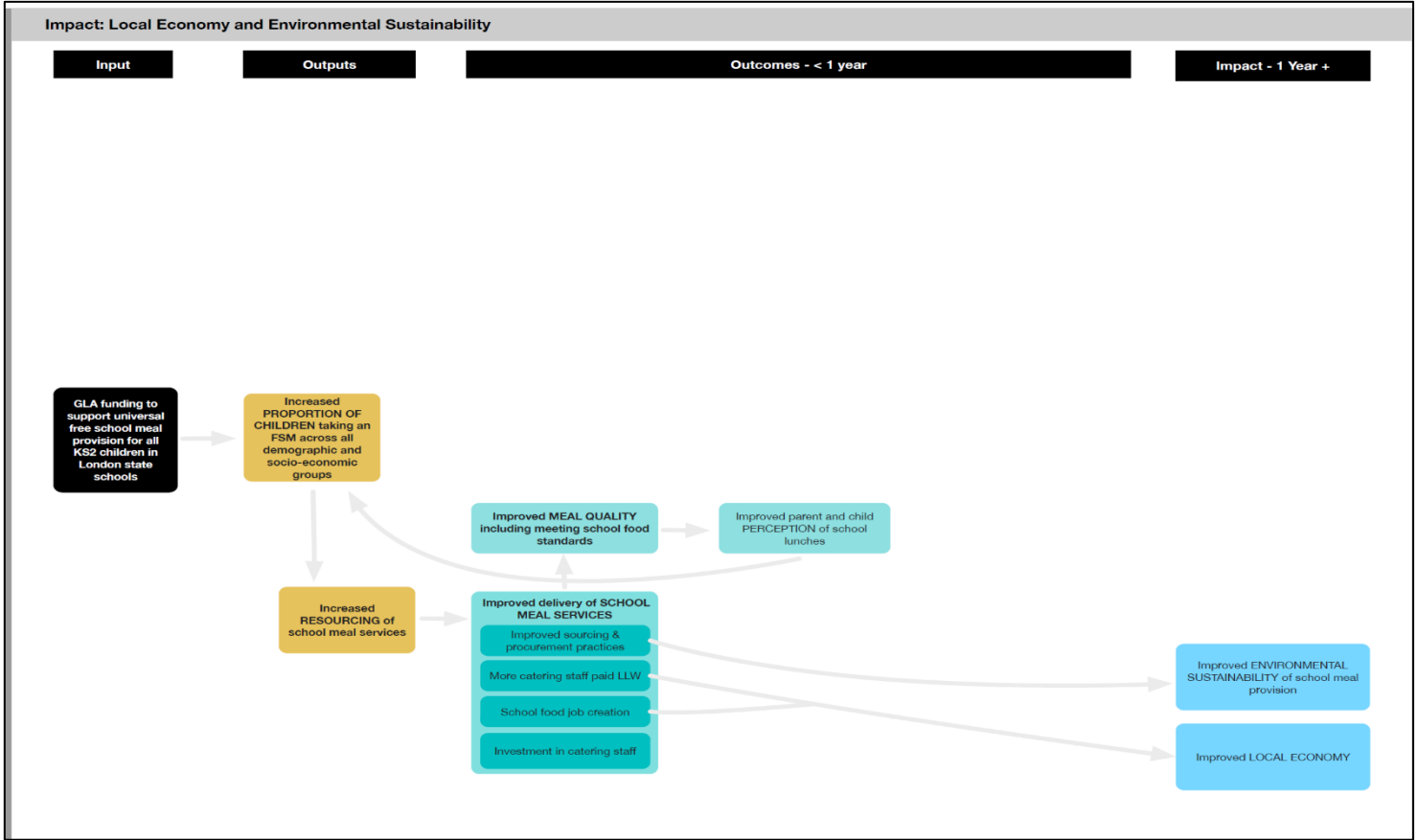
Annexes – UFSM IIA

- **Annex A** – Theory of Change
- **Annex B** – UFSM Equality Impact Assessment (FINAL)
- **Annex C** - GLA Independent Schools Analysis 20230630 (FINAL)
- **Annex D** – Policy review list
- **Annex E** – Stakeholders engagement
- **Annex F** – Glossary of abbreviations and terms
- **Annex G** – Updated Literature Review

Annex A – Theory of Change







Universal Primary Free School Meals – a Rapid Evidence Review

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

Introduction

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

Impact on Urban Health (IoUH) commissioned Bremner and Co. to develop a Theory of Change (ToC) that could build consensus to:

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

Updated Systematic Review

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

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

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

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

An Evidence-based Theory of Change

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

Household Financial Circumstances and Food Security

The systematic review finds good evidence to suggest that UFSM provision is associated with increased food security. There is evidence from England that UFSM policies have led to cost savings for families. Studies use different measures and methodologies to estimate cost savings. One study looking at the UFSM programme estimated household savings to be £10 per week per child (Sellen et al., 2018). Another study evaluating data from universal Key Stage 1 and 2 FSM provision in some LAs in England, estimated monthly household food expenditure reductions of between £34.50 in a household with one parent and one eligible UFSM child and £69.00 in a household with two parents and two UFSM-eligible children (Holford and Rabe, 2022). In low-income households where weekly family food budgets may be as low as £25 such savings make a significant contribution to household finances and food security (O'Connell and Brannen). Qualitative studies from the UK highlight the importance of FSM in contributing to child and household food security for those families in receipt of the means tested-benefit (Shinwell and Defeyter, 2021; O'Connell and Brannen, 2021).

Mental Health and Wellbeing

We suggest that the introduction of UFSM could have positive mental health and wellbeing impacts for children and their families. There is evidence of an association between good diet quality and positive mental health and wellbeing in children (O'Neil et al., 2014; Khalid et al., 2016). Improving children's diet quality through UFSM provision (assuming increased participation and improved quality arising from increased resourcing) could therefore contribute to improved mental health.

For food-insecure families the effects could be particularly pronounced. There is a well-documented association between adult and child food insecurity and poor mental health and wellbeing outcomes, including depression, anxiety and stress, and in children suicidal ideation (Cain et al., 2022). We suggest that reducing food insecurity should therefore support improvements in mental health and wellbeing. Qualitative studies identify that food insecure children in England experience feelings of stigma and shame (Connolly, 2022; O'Connell and Brannen, 2022). There is also evidence that despite school efforts to minimise identification of children eligible for FSM, experiences of means tested FSM provision can also lead to embarrassment and shame (Sahota et al., 2014; NECPC, 2021; O'Connell and Brannen, 2022). The systematic review finds evidence that universal meal provision can lead to reduced stigma.

Physical Health

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

Within the UK there is consistent evidence that packed lunches have a lower nutritional content than school lunches (Stevens et al., 2013; Evans et al., 2016; Evans et al., 2020), particularly for children within low-income households (Stevens and Nelson, 2011).

Families on low incomes, but not eligible for FSM report they are unable to afford paid-for school meals (O’Connell and Brannen. 2022). We infer that increased uptake of school meals could improve the diet quality of children making the change from packed lunches to school meals and would have significant impact for children in poorer households.

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

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

Learning and attainment

The systematic review finds moderate evidence from the UK and internationally that UFSM provision is associated with improvements in academic performance. We suggest there are a number of ways in which UFSM provision could have a positive impact on children’s learning and attainment, namely improved: attendance; cognitive function; and social and learning behaviours.

The systematic review finds moderate evidence that there is a positive relationship between UFSM provision and attendance, although limited research from the UK. Researchers propose that improved health arising from improved nutrition leads to reduced health-related absence, and that accessing the free lunch offer could be a motivating factor. Additionally, school stakeholders we spoke to suggested that the positive experience of commensality (eating together) and reduced feelings of stigma and shame would improve children and their families’ relationships with school and so improve attendance. It was also suggested that this would improve social and learning behaviours in the classroom leading to improved learning outcomes.

There is a relationship between diet quality and brain development, protection and cognition (Naveed et al. 2020). There is consistent evidence that long-term healthy dietary consumption is positively associated with executive function, which is important for “goal-directed behaviours, including inhibitory control, working memory, attention and planning”. (Cohen et al., 2016 p989). Working on the assumption that increased school meal uptake would lead to improved diet quality (for which the systematic review finds good evidence of an association), we consider that it could also contribute to improved cognitive function and so in the long-term academic attainment.

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

Local Economy

The World Food Programme estimates that globally 1,377 jobs are created for every 100,000 children fed via a school feeding programme (WFP, 2022). A cost:benefit analysis of UFSM provision in England estimates a £52bn contribution to the economy over a 20

year time period linked to returns to labour and supply chain procurement from UFSM provision (IoUH, 2022). Although limited by the one-year nature of this policy, we might hope to see some short-term increases in local labour demand and supply chain requirements arising from the expansion to UFSM provision. The principles of grant accompanying the GLA funding for UFSM encourage schools to pay their catering staff the London Living Wage which should contribute financial security amongst those workers and possibly increased spending within the local economy.

Environmental Sustainability of School Meals

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

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ANNEX B – EqIA

MD3146 Appendix A (i) EqIA (2).pdf

ANNEX C – Independent Schools Analysis

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

Annex D – Policy review list

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

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

Document	Key policy/strategy	Key considerations
		<ul style="list-style-type: none"> Support children achieve and maintain a healthy weight. Support all children and young people to grow into healthy, resilient adults.
The London Health Inequalities Strategy 2018	Healthy Places	<ul style="list-style-type: none"> Improve air quality and have fewer harmful pollutions – especially priority areas such as schools. Reduce poverty and income inequality, which impact health. Increase the number of working Londoners with health-promoting, well-paid and secure jobs. Support the London Living Wage to reflect the actual cost of living in London.
The London Health Inequalities Strategy 2018	Healthy communities	<ul style="list-style-type: none"> Improve own and their communities' health and wellbeing. Support communities to ensure they are safe, and are united against all forms of hatred. Develop social prescribing strategy and promote community use, particularly the most deprived communities. Support communities to tackle HIV, TB and other infectious diseases and address the stigma around them.
The London Health Inequalities Strategy 2018	Healthy Living	<ul style="list-style-type: none"> Promote physical activity needed to sustain good health, particularly supporting the most inactive. Deploy the London Food Strategy to ensure access to healthy food for most vulnerable and deprived communities. Reduce use or harms inflicted by tobacco, illicit drugs, alcohol and gambling.
The Mayor's Equality, Diversity and Inclusion Strategy 2018	Equal communities	<ul style="list-style-type: none"> Ensure a more equal, integrated and inclusive city. Reduce child poverty rates. Ensure inclusive and continued education and training. Safe and healthy communities. Ensure the GLA is an inclusive employer.
The London Plan 2021	Social Infrastructure	<ul style="list-style-type: none"> Ensure sufficient supply of good-quality education and childcare facilities to meet demands and provide educational choices. Ensure sufficient supply of good-quality sports and recreation facilities.

Document	Key policy/strategy	Key considerations
		<ul style="list-style-type: none"> Where possible, spaces for food growing should be incorporated in playgrounds and school sites, supporting health and educational benefits. Ensure Social infrastructure meets the need of diverse communities.
The London Plan 2021	Transport	<ul style="list-style-type: none"> 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. Reduce freight trips on the road network.
London Environmental Strategy 2018	Environment (New approaches)	<ul style="list-style-type: none"> Promote a low-carbon circular economy. Promote green infrastructure and natural capital accounting. Promote the Healthy Streets Approach.
London Environmental Strategy 2018	Environment (Air Quality)	<ul style="list-style-type: none"> Reduce exposure to harmful pollution across London, especially at priority locations such as schools; and tackle health inequality. Achieve legal compliance with UK and EU limits as soon as possible. Achieve air-quality targets for a cleaner London, meeting WHO health-based guideline by 2030 by transitioning to a zero-emission London. Reduce impacts on most disadvantaged communities.
London Environmental Strategy 2018	Environment (Waste)	<ul style="list-style-type: none"> Reduce waste, with a specific focus on single-use plastic and food waste.
London Environmental Strategy 2018	Environment (Noise)	<ul style="list-style-type: none"> Reduce the adverse impacts of noise from transport and non-transport sources. Promote a reduction in car travel (encourage walking, cycling and public transport). Promote quieter, low-emission vehicles and road surfaces. Reduce noise from freight activity through the consolidation of services.
London Environmental Strategy 2018	Environment (Climate adaptation)	<ul style="list-style-type: none"> Adapt and manage risks and impacts of severe weather and future climate change in London on critical infrastructure, public services, buildings and people. Ensure London's water supply is safe, efficient, secure, resilient and affordable.

Document	Key policy/ strategy	Key considerations
		<ul style="list-style-type: none"> Ensure infrastructure providers and occupants of homes, schools, hospitals, and care homes are aware of the impact of increased temperatures and the Urban Heat Island, to protect health and reduce health inequalities.
London Environmental Strategy 2018	Environment (Climate change mitigation and energy / Transition to a low carbon economy)	<ul style="list-style-type: none"> Decarbonise homes and workplaces, while protecting the most disadvantages by tackling fuel poverty. Deliver a zero-emission transport network by 2050. Enable transition to low-carbon circular economy. Create jobs, contribute to economy.

Annex E – Stakeholder engagement

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

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

Annex F – Glossary of abbreviations & terms

Abbreviations	Definition
ADHD	Attention deficit hyperactivity disorder
AFRID	Avoidant restrictive food intake disorder
CAPEX	Capital expenditure
CPAG	Child Poverty Action Group
DfE	Department for Education
DLUHC	Department for Levelling Up Housing and Communities
EA	Environmental Assessment
EcIA	Economic Impact Assessment
EEF	Education Endowment Foundation
EHCP	Education, health and care plan
EqIA	Equality Impact Assessment
FSM	Free School Meals
GCSE	General Certificate of Secondary Education
GLA	Greater London Authority
HIA	Health Impact Assessment
HM Treasury	His Majesty's Treasury
HUDU	Healthy Urban Development Unit
IEMA	Institute of Environmental Management
IIA	Integrated Impact Assessment
KS1	Key Stage 1
KS2	Key Stage 2
LA	Local authority
LACA	Local Authorities Catering Association
LB	London borough
LLW	London Living Wage
MHCLG	Ministry of Housing, Communities & Local Government
NHS	National Health Service
NRPF	No recourse to public funds
Ofsted	The Office for Standards in Education, Children's Services and Skills
ONS	Office for National Statistics
PAG	Partnership Advisory Group
PHE	Public Health England
RTPI	The Royal Town and Planning Institute
PwC	PricewaterhouseCoopers
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SEND	Special educational needs and disabilities
UFSM	Universal Free School Meals
UIFSM	Universal Infant Free School Meals
WHO	World Health Organization

Terms	Definition
Alternative provision	<p>Education arranged by LAs for pupils who, because of exclusion, illness or other reasons, would not otherwise receive suitable education.</p> <p>Education arranged by schools for pupils on a fixed-period exclusion; and pupils being directed by schools to off-site provision to improve their behaviour.</p>
Baseline	Existing conditions against which future changes can be measured.
Economic Impact Assessment (EclA)	The assessment of a project, plan or policy's economic impacts (both beneficial and detrimental), identifying: economic benefits; and measures to avoid, manage, minimise and mitigate economic impacts.
Eligibility	Whether a pupil meets the income threshold to qualify for FSM under the current policy.
Equality Impact Assessment (EqIA)	A predictive assessment of the possible equality effects arising from the design and implementation of a plan, policy, project or strategy for people sharing one or more protected characteristics.
The Equality Act	Act of Parliament that consolidates previous legislation – including the Sex Discrimination Act 1975, the Race Discrimination Act 1976, and the Disability Discrimination Act 1995 – designed to prohibit discrimination on the grounds of those protected characteristics described in the Act.
Free school meals (FSM)	This refers to the national government funded scheme for the provision of FSM for KS1 pupils on a universal basis and for KS2 pupils according to prescriptive eligibility criteria within state-funded primary schools.
Health Impact Assessment (HIA)	A practical approach used to assess the potential health effects of a policy, programme or project on a population, particularly on vulnerable or disadvantaged groups.
Ineligible pupils	Pupils who do not meet the current criteria to be eligible for FSM.
Integrated Impact Assessment (IIA)	The IIA is a means by which different technical assessments are brought together in a holistic and integrated manner. For the IIA for UFSM, this includes Environmental, Equality, Health, and Economic Impact Assessments.

Terms	Definition
Key Stage 1 (KS1)	A phase of primary education for pupils aged 5 to 7 in England.
Key Stage 2 (KS2)	A phase of primary education for pupils aged 7 to 11 in England.
Packed lunch	A lunch provided and paid for by the pupil's family, parent or guardian.
Paid-for school lunch	A school meal paid for by the family, parent or guardian when a pupil is not eligible for FSM.
Protected characteristics	<p>Nine groups identified in the Equality Act 2010 as sharing a particular characteristic against which it is illegal to discriminate:</p> <ul style="list-style-type: none"> • age • disability • gender reassignment • marriage and civil partnership • pregnancy and maternity • race • religion and belief • sex • sexual orientation.
Public Sector Equality Duty	<p>The public sector equality duty (section 149 of the Equality Act 2010) requires public authorities in carrying out their functions, to have due regard to the need to:</p> <ul style="list-style-type: none"> • eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010 • advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it • foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
Pupil Premium	The pupil premium is a grant given by the government to schools in England to decrease the attainment gap for the most disadvantaged children, whether by income or by family upheaval. For each pupil who is eligible for FSM, or has claimed FSM in the last six years, their school receives financial income.

Terms	Definition
UFSM	The Mayor of London's scheme to ensure that all children in state-funded primary schools in the capital receive FSM for the 2023-24 and 2024-25 academic years.
Special educational needs and disabilities (SEND)	SEND is a term used to describe learning difficulties or disabilities that make it harder for a child or young person to learn compared to children of the same age.
Strategic Environmental Assessment (SEA)	A systematic process for evaluating the environmental implications of a policy, plan or programme.
Study area	Defined area where the policy will be applied (across all LBs). It is used as a geographical basis for reporting local community impacts and effects.
Sustainability Appraisal (SA)	A systematic process that must be carried out during the preparation of local plan, policy and/or strategies that promotes sustainable development by assessing the extent to which the emerging plan/policy/strategy will help achieve environmental, economic and social objectives.
Take-up	A figure estimated on School Census Day, to determine how many pupils who are eligible for FSM have 'taken' and consumed a school lunch.
Universal Infant Free School Meals (UFSM)	This refers to the current universal provision of FSM to all children in KS1, in state-funded schools.

Annex G – Updated Literature Review

A rapid literature review of new evidence

A systematic review of the literature was undertaken in March 2023, as part of the development of an evidence-based Theory of Change. This was developed by Bremner & Co and funded by Impact on Urban Health. This can be found annexed in the IIA. See: GLA, Integrated Impact Assessment Universal Free School Meals.

A preliminary rapid review of the evidence was undertaken in February 2024, to identify any new considerations for the UFSM IIA. A second Theory of Change was developed in March 2024, by Bremner & Co (funded by Impact on Urban Health). Findings below are high-level and themed according to impacts. The information below only captures new learning and is intended to be read alongside the 2023 review.

Household financial circumstances and food security

Latest research continues to show the success of UFSM schemes as alleviating household financial hardship and reduces food insecurity. An ISER study reported household savings of £41 every four weeks.¹¹⁴ Another report highlighted reduced financial hardship and stress for families.¹¹⁵ A 2023 article from BMC Public Health presents the findings of the evaluation of a pilot of a UFSM scheme in two secondary schools in London. The study found that the pilot increased access to a healthy meal, reduced food insecurity, improved nutrition, and generated some social benefits.¹¹⁶ Additional evidence from the Institute for Fiscal Studies highlights a meal price of £2.87 would be in line with inflation.¹¹⁷

Learning and attainment

Latest evidence continues to highlight food security and reduced hunger can be associated with positively impacting learning attainment.¹¹⁸ Additionally, a slight improvement in reading scores was evidenced in an ISER study. However, no improvement in maths or writing was observed.¹¹⁹

A study from the Food Foundation found that children who had not eaten in the morning were hungry; this impacted their ability to concentrate in lessons. The impact on attainment may therefore be limited for children who only eat lunch.¹²⁰

Environment

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

¹¹⁴ ISER, The impacts of Universal Free School Meal schemes in England, February 2024

¹¹⁵ Health, wellbeing and nutritional impacts after 2 years of free school meals in New Zealand, Health Promotion International, Volume 38, Issue 4, August 2023, daad093, <https://doi.org/10.1093/heapro/daad093>

¹¹⁶ A qualitative process evaluation of universal free school meal provision in two London secondary schools, Jessiman, P.E., Carlisle, V.R., Breheny, K. et al. BMC Public Health 23, 300 (2023). <https://doi.org/10.1186/s12889-023-15082-3>

¹¹⁷ IFS, The policy menu for school lunches: options and trade-offs in expanding free school meals in England, 29 March 2023

¹¹⁸ UK Parliament, Child food insecurity and Free School Meals, 31 July 2023

¹¹⁹ ISER, The impacts of Universal Free School Meal schemes in England, February 2024

¹²⁰ The Food Foundation, A better deal for free school meals, November 2023

potential.¹²¹ A report assessing the impact of a school lunch programme in New Zealand highlighted that low school-meal uptake increased food waste.¹²²

Other recent evidence in 2023 investigates the role of LAs as creating healthy sustainable forms of food production. The report outlines a range of initiatives taken by LAs across the UK covering issues such as restricting advertising of food containing high fat, sugar and salt across council estates; using procurement systems to improve the quality of school food; and making it easier for local food suppliers to access regional public supply chains.¹²³

New legislation on packaging came into force earlier in 2024 and encourage 'small producers to collect data' on packaging. This includes the government ban on single-use plastics¹²⁴ and the extended producer responsibility scheme.¹²⁵

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

The Committee also highlighted the importance of 'Capital Growth' – a scheme to promote local food production, noting that LAs own land that could be used to grow local food, and minimise transportation of food, suggesting policy makers to lever funding opportunities to LAs to encourage this.¹²⁶

Physical health

In a recent ISER study, evidence suggests a positive improvement on obesity levels amongst children. This included reduced obesity levels in Reception children (dropping from 7 per cent to 11 per cent) and Year 6 (from 5 per cent to 8 per cent). These figures are from a study in London boroughs where children had received FSM for their entire time in primary school. However, UFSM did not appear to have an impact on obesity levels in schools that already had the highest levels of obesity.¹²⁷ The study suggests additional interventions to reduce obesity in these particular schools.

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

Wider economic benefits

A PWC report commissioned by Impact on Urban Health, published in October 2023, investigated the expansion of FSM across primary and secondary schools in London and

¹²¹ Plant-based school meals as levers of sustainable food transitions: A narrative review and conceptual framework, Journal of Agriculture and Food Research, Volume 10, December 2022, 100429

¹²² Health, wellbeing and nutritional impacts after 2 years of free school meals in New Zealand, Health Promotion International, Volume 38, Issue 4, August 2023, daad093, <https://doi.org/10.1093/heapro/daad093>

¹²³ Ref No: AA0056; Petrovic, Leticija. Serving up a food strategy, IN MJ, 7 Sep 2023, pp14-15.

¹²⁴ Defra, Single-use plastics bans and restrictions, 22 January 2024 – updated 7 October 2024

¹²⁵ Defra, Extended producer responsibility for packaging: who is affected and what to do, 7 June 2022 – updated 3 April 2025

¹²⁶ GLA, Environment Committee, 7 February 2024

¹²⁷ ISER, The impacts of Universal Free School Meal schemes in England, February 2024

England. The report focuses on the wider contribution stimulated by the supply chain activities from expanding FSM; and focuses on 2024-30.

The estimated 2024-30 GVA impact for UFSM provision, for this period, is £13.9bn in England and London £2.1bn in London. For both London and England, the majority of the wider GVA generated through expanding UFSM provision comes from the supply chain activities, mostly contributed by the food and beverage sector.

It is estimated that, for this period, expansion of UFSM will support 40k additional FTE jobs in England, and 5.2k additional jobs in London. For both London and England, the majority of these jobs are in the food and beverage, and wholesale trade sectors.¹²⁸

In a report on the economic rationale for investment in UFSM, evidence points to a high return on investment in human health and economic benefits. As well as financial relief to families, the report also highlights economic development and job creation leading to 207,700 new jobs over 10 years. Additionally, it points to an increase in students' lifetime earnings, of between 3 per cent and 6 per cent, due to improved learning outcomes.¹²⁹

Stigma and inequality

The ISER study also found that making FSM universal accounted for an 8 per cent increase in take-up among those who had already been entitled to them. This is possibly because it changed school culture, and the stigma around having them. It appeared to lead to one in three children taking up FSM for the first time.

Research from CPAG and NEU highlights nutrition improved for pupils, change eating habits, improved home school relationships and encouraged uptake in government eligible pupils.¹³⁰

However, a report from the Food Foundation notes that an estimated 33 per cent of children with disabilities miss out on the government's FSM provision, despite meeting the income-related eligibility requirements. This is due to the food on offer not meeting their dietary requirements or sensory processing difficulties; or the students not being in school to access the food (due to long-term illness). This also has a knock-on financial affect, with 85 per cent of families who miss out on FSM reporting increased pressure on their weekly budgets as a result. The report also refers to the administrative challenges that hinder children's access to FSM, as many people do not qualify for benefits – despite having a disability.¹³¹

A report published by the House of Commons highlights additional challenges with children receiving FSM – one of which is that disadvantaged children, who are most likely to be eligible, also have the highest rate of non-attendance in schools. The report notes that this poses an issue as, despite the service being available, the relevant children are not receiving the benefit. The report does note that data is inconclusive when relating to provision of FSM and an increase in attendance; it shows little to no correlation between the two, and that disadvantages are growing among already disadvantaged pupils.¹³²

¹²⁸ IoUH, [Expanding free school meals: Exploring the wider economic benefits](#)

¹²⁹ Ruetz Consulting, [The Economic Rationale for Investing in School Meal Programs for Canada: multi-sectoral impacts from comparable high-income countries](#), 26 October 2023

¹³⁰ CPAG, [The universalism multiplier](#), 12 December 2023

¹³¹ [Food insecurity and inequalities experienced by disabled people](#), December 2023

¹³² UK Parliament, [Tackle school absence crisis with better mental health and SEND support and urgent legislation](#), says Education Committee, 27 September 2023