

Section 1. What action is the Welsh Government considering and why?

Background

The provision of free school meals (FSMs) is a long-standing intervention which pre-dates devolved government in Wales, and the impacts and benefits of free school meals to families who rely on them is well documented¹.

The [Programme for Government](#)² commits us to meet the rise in demand for free school meals resulting from the pandemic and to review the eligibility criteria, extending entitlement as far as resources allow and at least to all primary school children. Ensuring primary school children are provided with an offer of a nutritious free school meal is a shared commitment between the Welsh Government and Plaid Cymru and is set out within the [Co-operation Agreement](#)³.

Our ambition to initially deliver free school meals to all primary school children in Wales⁴, is informed by our understanding that younger children are more likely to be living in relative income poverty⁵. Based on the number of pupils currently eligible for FSM and the total number of pupils in primary school, it is estimated this will mean an additional 186,0006 children will become eligible to take up the offer of a free school meal in Wales by 2024.

A phased approach to the universal primary free school meals (UPFSM) roll-out has meant that all local authorities were ready to deliver free school meals to Reception from the start of the autumn term (September 2022), with the majority extending the offer to years 1 and 2 from the start of the summer term (April 2023).

¹ [Fixing Lunch.pdf \(cpag.org.uk\)](#)

² [Programme for government | GOV.WALES](#)

³ [The Co-operation Agreement: 2021 | GOV.WALES](#)

⁴ All registered pupils in Reception to Year 6 at any school maintained by a local authority and all registered nursery age pupils attending a maintained school for at least two full sessions on any one day per week.

⁵ [Relative income poverty: April 2019 to March 2020 | GOV.WALES](#)

⁶ Calculated from Pupil Level Annual School Census (PLASC) 2021 data, includes eligible nursery pupils in maintained settings.

The Welsh Government and Plaid Cymru will continue to work with local authorities on plans to extend the scheme further into the 2023/24 academic year to meet the commitment for all primary school pupils to receive a free school meal by 2024.

Long term

UPFSMs represent an important further step to reaching our shared ambitions of tackling child poverty and ensuring that children have at least one nutritious meal every school day. It is a significant intervention to support families that are increasingly feeling the pressure of the cost of living, particularly families not currently eligible for FSMs but who are living in socio-economic disadvantage (low income but just above current eligibility thresholds). The universal offer will provide a level playing field for all children, helping to reduce the stigma sometimes associated with FSMs⁷ and increasing uptake by those that need it the most⁸.

Alongside this, UPFSMs will contribute to a whole school approach to food, educating children about where their food comes from, how it is produced, the impact on the environment, and providing opportunities for a wider range of foods to be tried, maximising opportunities for instilling healthy eating choices in the longer term.

In time, it will also impact on local food supply, increasing the amount of Welsh food on the public plate, reducing supply chains and benefitting local economies and helping to strengthen our Foundational Economy.

Prevention

UPFSMs is one of a number of programmes that make up the social wage in Wales, helping to keep money in people's pockets, supporting our efforts to eradicate child poverty and playing an important role in tackling child hunger by ensuring more children benefit from a healthy nutritious meal at least once a school day.

In addition, many of the expected outcomes such as improved wellbeing for children and families, raising the profile of healthy eating, improved social skills⁹ at mealtimes and improvements in behaviour and attainment¹⁰ are anticipated to have clear benefits now and, in the future - maximising health outcomes, reducing inequalities, and securing the wellbeing of future generations.

⁷ The cost of missing lunchtime: A Briefing on free school meals in North east of England [Full Text](#)

⁸ Expanding eligibility for free school meals in Wales – briefing for MSs and MpS IN Wales(CPAG, 2020) [Full Text](#) and according to data provided in February 2022 for the 2022 Pupil Level Annual School Census (PLASC): In primary schools, 42,084 out of 57,609 (73%) traditionally means tested eligible pupils took a free school meal.

⁹ [UIFSM-evaluation-7.compressed.pdf \(epi.org.uk\)](#)

¹⁰ [Nutrients | Free Full-Text | Universal School Meals and Associations with Student Participation, Attendance, Academic Performance, Diet Quality, Food Security, and Body Mass Index: A Systematic Review | HTML \(mdpi.com\)](#)

Integration

The provision of UPFSMs is a transformational intervention in terms of child hunger and child poverty and is part of a wider package of support to help low-income families and those struggling with the cost-of-living crisis.

UPFSMs has the potential to contribute to a number of public policy agendas and realise multiple benefits. The proposals are fully aligned with the Programme for Government and the [well-being goals](#)¹¹ for a fairer and healthier Wales and its wider benefits will contribute towards supporting a Wales that is economically, socially and environmentally sound.

Collaboration

Within Welsh Government successful delivery of the commitment will require cross portfolio working to deliver both the short and longer-term ambitions of this policy. A cross-government governance structure, including a Portfolio Board consisting of key policy areas with a contributory role has been established for this purpose.

Externally, the commitment requires close working with our key delivery partners, including local authorities and the Welsh Local Government Association (WLGA), Local Authority Catering Association Wales (LACA Wales), schools, food producers and suppliers, to co-construct an approach to implementation. This includes efforts to better understand and mitigate any potential barriers to delivery. A pan-Wales network of local authority partners underpins delivery and the Portfolio Board workstreams will engage directly with other interested parties.

Involvement

In the initial planning stages, additional funding totalling £1.482m shared across all local authorities, was provided to support preparations for the roll-out of UPFSMs in the following three areas:

- Early engagement with local stakeholders, including pupils, families, and delivery partners, to better understand behaviours that might impact on the delivery of an offer of a free school meal and the level of take-up.
- Audits of school infrastructure (including kitchen and dining facilities), workforce and contractual arrangements, to better understand existing capacity and where these need further development/investment.

¹¹ [Well-being of Future Generations \(Wales\) Act 2005](#)

- Consideration of the practical implications of changing free school meal eligibility, to explore where local programmes, policies, funding streams or entitlements that draw on the current FSM indicator at primary level will be affected and might be amended in the future.
- This engagement has informed policy development and implementation plans developed to date and will continue to do so through established partnership working and engagement mechanisms.

Impact

Delivery of UPFSMs represents a high-profile policy commitment with wide-ranging impacts on a variety of groups including learners, families, public and private sector workers. Given the cross-cutting nature of this programme, the objectives of the UPFSM programme are embedded in a number of policy areas, including social justice, the economy, environment, education and health.

It is recognised that there are families, not currently eligible for free school meals, who are living in socio-economic disadvantage and will benefit strongly from UPFSMs. This is particularly relevant in the context of supporting families who are feeling the impact of the cost-of-living crisis.

Beyond the impacts to learners and their families set out above, wider impacts are anticipated – helping to reduce health inequalities and in benefitting local communities, either through employment opportunities presented in the delivery of an upscaled school catering offer or through Foundational Economy approaches aimed and sourcing more Welsh food for the school plate.

Furthermore, the policy provides opportunities to reduce inequalities in a number of areas (health; economic; inequalities between families and communities; and the workforce). However, there are also risks that providing a universal provision could increase inequalities in these areas. Working with our key delivery partners to co-construct an approach to implementation and ongoing monitoring will help us to understand and mitigate emerging inequalities as they are identified.

Costs and savings

£60m capital funding, has been made available to support local authorities with the procurement of equipment and capital works needed to deliver this commitment. Work is underway to identify what further capital expenditure might be required.

A further £200m has been set aside to support local authorities in the practical delivery of the UPFSM commitment over the next 3 years¹². This includes a modest administration fee to cover additional costs incurred as a result of their administration of the offer.

The level of funding reflects our understanding of the cost of providing a meal and known pressures in the practical delivery of the offer, including the anticipated additional pupils they will have to feed (based on an 86% uptake) and by applying a consistent unit rate per meal across Wales. In addition, claims against the funding will be based on actual meals served - so where uptake remains lower than anticipated, payments to local authorities will reflect this as appropriate.

However, it will be important to monitor and review funding allocations, particularly in line with increasing costs in areas that may drive the cost of providing a meal and to ensure value for money is achieved in the longer term. A working group of relevant internal and external representatives has been established to take forward a review of the current unit rate, to ensure a fair and affordable rate that will support UPFSM delivery longer term.

Mechanism

Funding to date has been provided to local authorities by way of a grant. Consideration will be given to longer term delivery mechanisms following the initial roll-out.

¹² [The total funding for local authorities is based on additional take up from PLASC data and the roll out timeline](#)

Section 8. Conclusion

How have people most likely to be affected by the proposal been involved in developing it?

This programme will be delivered in partnership with key operational stakeholders, although there will not be extensive involvement of children and families in the initial implementation phase as this will be focused on later to increase uptake and review the Healthy Eating Regulations.

Additional funding was provided to all local authorities to support preparations for the roll-out of UPFSMs. The funding was used in a variety of ways and included:

- supporting early engagement with school headteachers to gain feed back on any foreseen challenges and opportunities in the practical delivery of UPFSMs
- reviews of staffing capacity and existing infrastructure
- consultation to gauge uptake numbers and any additional needs and dietary requirements
- engagement with parents and pupils to raise awareness of UPFSMs and
- promotion of UPFSMs through websites and social media

We will continue to work closely with our delivery partners throughout the implementation to review progress and take account of any challenges or opportunities identified, including any feedback received from children and parents.

Going forward, our plans for a three-year marketing and communications campaign to promote the roll out of UPFSMs will provide further opportunities to engage with those likely to be affected by the policy, including children and their parents and those that represent their interests. This work will be undertaken cross government to integrate activity into wider Welsh Government cost of living and other relevant campaigns.

What are the most significant impacts, positive and negative?

The actions within the Programme for Government and the Co-operation Agreement, support a stronger, fairer economy, improved and reformed public services and a united, connected, and sustainable Wales’.

The well-being goals and objectives further support this by focusing on the areas where action is needed to respond and recover from the impact of the coronavirus pandemic, whilst also laying out a stable foundation for the future. This is even more crucial in light of increasing cost of living.

Continuing to meet the rise in demand for free school meals and extending entitlement as far as resources allow, will make an important contribution to the long-term programme of education reform, and supporting the narrowing of educational inequalities. In addition, the delivery of UPFSMs seeks to maximise opportunities to support preventative approaches

which will, in the longer term, improve health outcomes and tackle economic inequalities between children, families and communities.

UPFSMs represents an important further step to reaching our shared ambitions of tackling child poverty. It will increase the number of children who receive a nutritious meal during the school day and, therefore, support improved nutrition more generally¹³. This will maximise opportunities for instilling healthy eating choices in the longer term and encourage wider opportunities to make healthy living choices to support improved health outcomes into adulthood.

The policy has the potential to create opportunities for more children to share and enjoy a meal together, which we hope will reap the benefits of our investment in pupils' learning; in their social skills and in their longer-term health. This includes wider wellbeing, as shared mealtimes offer a sense of containment and familiarity and offer children and young people the opportunity to pause and listen to and interact with others. This should not however, impact on opportunities for active play or participation in other activities. These opportunities contribute strongly to children's health and well-being; physical and mental health; reducing childhood obesity; and reducing the likelihood they will suffer from anxiety, depression and other disorders.

UPFSMs also has the potential to reduce inequalities and support better community cohesion between those families eligible for FSMs and those families that are living in low-income households, who are living in socio-economic disadvantage, but not eligible for FSMs. This is particularly important as more families experience the impacts of the cost-of-living crisis. In addition, universal provision is likely to reduce the stigma attached to means tested free school meals, increasing uptake from those that need it most, will have positive longer-term impacts on education, mental health and well-being and standards of living for all children.

It will seek to support local food production and reduced supply chains - reducing reliance on imported produce which can have higher environmental and climate impacts. It will seek to maximise opportunities to support approaches that contribute to improved biodiversity and well-functioning ecosystems which will have positive health benefits across all communities in Wales. In addition, it will contribute to a whole school approach to food, educating young people about where their food comes from, how it is produced and the impact on the environment.

Many of the short and longer-term outcomes may be beneficial in supporting businesses and boosting the wider economy - keeping more money in families' pockets. Furthermore, the scale of the UPFSM offer may increase job opportunities within the current school catering workforce and locally sourced food supply chain – supporting more people into employment and opportunities for building skills and progressing in work which help tackle in-work poverty.

¹³ [The current 'The Healthy Eating in Schools \(Nutritional Standards and Requirements\) \(Wales\) Regulations 2013' and supporting guidance, ensure that the provision available meets very specific nutritional requirements.](#)

However, we also recognise there are challenges in delivering a universal provision and there are risks that the policy could increase inequalities between children, families, communities and the workforce. Therefore, successful delivery of the commitment and its short and longer-term ambitions will require a collaborative approach across Welsh Government and at a local level, with our key delivery partners and those affected. This will be essential to the effectiveness of the policy in addressing and not increasing inequalities by:

- ensuring there is sufficient school infrastructure (catering and dining facilities) and workforce capacity to support the expansion
- managing the practical implications of delivering UPFSMs to cause as little disruption as possible, for example, staggering lunchbreaks to ensure sufficient time for play and participation in other activities
- maintaining high quality provision and increasing the supply of Welsh food onto the school plate
- meeting specific requirements of those with the greatest needs and learners with dietary needs
- providing equity of provision across all primary schools in Wales and
- realising the full benefits of UPFSMs by maximising take up of the offer

How will the impact of the proposal be monitored and evaluated?

Options for a formal evaluation of the UPFSM policy are currently under consideration. It is essential that a robust evaluation of the implementation of the UPFSM policy is performed. The evaluation should consider not only the implementation of the programme, but also its impacts across a variety of domains. It is intended that this will be a live evaluation feeding into the delivery of the UPFSM commitment as it is rolled out.

A number of existing mechanisms for monitoring uptake and understanding implementation of the policy are already in place - we will continue to monitor uptake through regular reporting and meetings with local authorities, and continue to work closely with our key delivery partners and those affected by the policy to assess the impact of UPFSMs and its alignment with national and local priorities, ensuring that any barriers to its implementation are identified and mitigated.

In addition, it is important that eFSM take up does not decline as a result of the UPFSM offer and that eligible families still apply for eFSM to access other forms of support. We will therefore, review PLASC data to monitor the take up of eFSM and assess if any further action is needed through our ongoing marketing and communications campaigns.

We will use the feedback and learning from the roll-out of UPFSMs to inform other key area of work that will support the wider food in schools offer, including reviewing FSM eligibility more generally, updating the 'The Healthy Eating in Schools (Nutritional

Standards and Requirements) (Wales) Regulations 2013'¹⁴, ensuring a co-ordinated approach to food supply and procurement, and maximising the wider benefits of UPFSMs through the development of a whole school approach to food.

Within Welsh Government, a cross-government governance structure, including a Portfolio Board consisting of key policy areas with a contributory role has been established for this purpose. In addition, a number of working groups are being established with relevant internal and external experts to support and take forward aspects of this work.

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¹⁴ [The Healthy Eating in Schools \(Nutritional Standards and Requirements\) \(Wales\) Regulations 2013 \(legislation.gov.uk\)](https://legislation.gov.uk)