

Children's Rights Impact Assessment

Universal Primary Free Schools Meals (UPFSMs)

Policy Objective

The Programme for Government 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 families who are feeling the impact of the cost-of-living crisis are provided with an offer of a nutritious free school meal is a shared commitment within the Co-operation Agreement between the Welsh Government and Plaid Cymru.

Gathering evidence and engaging with children and young people

We have been working closely with our key delivery partners and those representing the interests of children and young people, 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.

Funding was provided to local authorities as the key agents of change to support preparations for the roll-out, including, early engagement with local stakeholders, including pupils, families, and delivery partners. This included efforts to better understand and mitigate any potential barriers to delivery and behaviours that might impact on the delivery of an offer of a free school meal and the level of take-up.

Feedback from this engagement has allowed local authorities and schools to develop local implementation plans, taking into account local needs and circumstances.

Analysing the evidence and assessing the impact

During the early stages of the roll-out feedback was received from those affected by the policy and building on this, we can propose that the main positive impacts will be:

- **Health Benefits:** It provides all learners in Primary School with a healthy, nutritious meal every day.
- **Behaviour and Attainment benefits:** It helps to realise longer term benefits by instilling early in life healthy eating habits and attitudes that children will carry into adulthood, raise the profile of healthy eating across the whole school, increase the range of food pupils eat and improve social skills and wellbeing at mealtimes.
- **Food poverty:** will support our efforts to eradicate child poverty and play an important role in tackling child hunger.
- **Benefit the local Economy:** invest in our economy by supporting businesses providing local, sustainable food. In time it will also impact on local food supply and provide lasting support for the Welsh economy.
- **Aligns to our Future Generation aspirations:** creating an opportunity for all primary children to share and enjoy a meal together, we hope to reap the benefits of our investment in pupils' learning; in their social skills and in their longer-term health.

We also recognise there are challenges in delivering a universal provision that will need to be monitored and reviewed throughout its early implementation and beyond:

- 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 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 need and those learners with specific dietary requirements
- providing equity of provision across all primary schools in Wales and
- realising the full benefits of UPFSMs by maximising take up of the offer

Ministerial advice and decision

Delivery of UPFSMs is a Co-operation Agreement commitment. No child should ever be at school hungry. Plaid Cymru and the Welsh Government are agreed that the provision of

UPFSMs should be a transformational intervention in terms of child hunger and child poverty, but also in supporting educational attainment and child nutrition whilst also enhancing local food production and distribution chains, benefiting local economies.

As UPFSMs is implemented, monitoring data, collected as part of the funding terms and conditions and continued regular engagement with local authorities, will inform the level of uptake achieved and identify any opportunities and challenges to delivery of the offer. This will inform advice to the Minister for Education and Welsh Language in respect of the immediate pace of extending the offer to all primary school children.

In addition, this will support Welsh Government to 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 September 2024.

Communicating with Children and Young People

Continued engagement will be an important part of the roll-out and longer-term implementation. This will provide opportunities for local authorities and schools to gain valuable feedback to inform future delivery, particularly the voices and experiences of children and their parents.

Lessons from the engagement to date will be used to inform menu designs and taster sessions and develop a whole school approach to food education – integrating opportunities for helping children to understand where their food comes from and the importance of a healthy diet to their wellbeing.

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

Monitoring and Review

Levels of uptake; spend; and qualitative feedback, via regular progress meetings with local authorities, will be monitored via grant terms and conditions. This will help us to

understand any emerging opportunities and challenges and assess whether there is more we can do to better support delivery.

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.

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 2013'¹, 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.

The programme will particularly enhance the UNCRC article 6 and 24 with a focus on strengthening a child's right to nutritious food that improves their health.

¹ [The Healthy Eating in Schools \(Nutritional Standards and Requirements\) \(Wales\) Regulations 2013 \(legislation.gov.uk\)](https://legislation.gov.uk)

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
<p>Article 1 All children have rights</p> <p>Article 3 All organisations concerned with children should work towards what is best for each child.</p>	X		<p>Ensuring all 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 Agreement².</p> <p>Evidence suggests that younger children are more likely to be living in relative income poverty. Therefore, initial focus is on the delivery of universal free school meals to primary pupils, rolling out to the youngest first. This means other families (of pupils not eligible or not yet eligible for UPFSMs) will not benefit. However, the PfG commits us to review eligibility of FSM in this Senedd Term³.</p> <p>Co-production, across Welsh Government portfolios and with our key delivery partners has been central to the local implementation of UPFSMs. Working together in this way will mean an additional 186,000⁴ children will become eligible to take up the offer of a free school meal in Wales by 2024.</p>
<p>Article 6 All children have the right of life. Governments should ensure that children</p>	X	X	<p>The provision UPFSMs is a transformational intervention in terms of child hunger and child poverty and is part of a wider package of support to</p>

² [The Co-operation Agreement: 2021 | GOV.WALES](#)

³ Some children and young people will also be covered by 'transitional protection'. This protection means that pupils eligible for free school meals when the criteria changed, or any new claimants who gain free school meals during the rollout of Universal Credit, would be protected against losing free school meals whilst Universal Credit is rolled out across Wales, even if their eligibility changes.

⁴ Calculated from Pupil Level Annual School Census (PLASC) 2021 data – includes eligible nursery pupils in maintained settings.

<p>survive and develop healthily.</p> <p>Article 15 Children have the right to meet together and to join groups and organisations, as long as this does not stop other people from enjoying their rights.</p> <p>Article 19 Governments should ensure that children are properly cared for and protect them from violence, abuse and neglect by their parents or anyone else who looks after them.</p> <p>Article 24 Children have the right to good quality health care and to clean water, nutritious food and a clean environment so that they will stay healthy.</p> <p>Article 26 The Government should provide extra money for the children of families in need.</p> <p>Article 27 Children have a right to a standard of living that is good enough to meet their physical and mental needs. The Government should help families who cannot afford to provide this.</p> <p>Article 31 (leisure, play and culture) Every child has the right to relax, play and take part in a wide</p>			<p>help low-income families and those struggling with the cost-of-living crisis.</p> <p>UPFSMs ensures that children have at least one nutritious meal every school day.</p> <p>UPFSMs will have a particular benefit for some children, including those with no recourse to public funds and looked after children.</p> <p>In addition, it supports opportunities to address inequalities in health and well-being by reducing the stigma and increasing uptake from those that need it most; raising the profile of healthy eating across the whole school and increasing the range of food pupils eat; and supporting improvements in behaviour and attainment.</p> <p>UPFSMs 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.</p> <p>However, there is a risk that the expansion means more time is needed to serve more meals to more learners and that this could impact on their time to play; socialise; or participation in other activities. These activities contribute strongly to children's health and well-being. It is shown as contributing to both children's physical and mental health, reducing childhood obesity and reducing the likelihood they will suffer from anxiety, depression and other disorders.</p>
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<p>range of cultural and artistic activities.</p>		<p>There may be a risk that children (particularly younger children) or other groups, may not take up the offer because of the choice and type of meals offered and their willingness to try new/different foods. Lessons from the engagement to date will be used to inform menu designs and taster sessions and develop a whole school approach to food education – integrating opportunities for helping children to understand where their food comes from and the importance of a healthy diet to their wellbeing. Additional funding has been provided to all local authorities to support preparations for the roll-out of UPFSMs. The funding will help to make improvements to the schools' infrastructure, to ensure there is sufficient kitchen and dining facilities to support the expansion.</p> <p>In addition, local implementation plans will consider the practical implications of delivering UPFSMs and how this can be managed to cause as little disruption as possible, for example, staggering lunchbreaks to ensure sufficient time for play.</p> <p>Furthermore, the phased approach to the roll-out will provide opportunities to reflect and respond to emerging issues. Welsh Government will continue to work closely with our key delivery partners to monitor implementation and support pro-active action to address any issues that may arise.</p> <p>In the longer term UPFSMs will help to maximise opportunities 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</p>
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			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 of food on their bodies and the environment.
Article 29 Education should develop each child's personality and talents to the full. It should encourage children to respect their parents, their own and other cultures and the environment.	X		An important part of the UPFSMs policy is to support the link to and promotion of more locally sourced food as much as possible, using local suppliers and fresh seasonal products. This may provide opportunities to learn about different food cultures in school and the links between food supply and impacts on the economy and environment.