

19 December 2025

Dear

### **Information requested**

Thank you for your request which I received on 16 December 2025 You asked for:

**1. Impact on School Funding**

Since the introduction of Universal Primary Free School Meals, whether schools have seen any reduction in funding, such as to the Pupil Development Grant, because of changes to free school meal eligibility which is used as a proxy for socio-economic disadvantage and informs allocations.

**2. Evidence on Registration Trends**

Any analysis, assessments, or internal Welsh Government discussions that look at whether the number of families registering for free school meals has dropped since the universal offer began.

**3. Actions Taken to Protect Funding**

What measures the Welsh Government has put in place to prevent schools from losing deprivation-linked funding if fewer families register for free school meals. This could include campaigns, guidance, or other steps to encourage continued registration.

**4. Guidance Issued to Schools and Councils**

Whether the Welsh Government has provided official advice or guidance to local authorities or schools on how to safeguard deprivation-based funding following the rollout of UPFSM. You would also prefer this information broken down by financial year, where possible.

### **Our response**

#### **Q1 – Impact on School Funding**

The budget for the Pupil Development Grant (PDG) has remained the same, at £128m, since the introduction of Universal Primary Free School Meals (UPFSM). Funding within the PDG budget is allocated to schools based on the number of their learners that are eligible for Free School Meals (eFSM), which fluctuates each year.

Overall, the number of learners eligible for free school meals in Wales has been falling since 2023. To combat this, in 2025-26 we maintained the same PDG budget and distributed £13m of funding leftover in this budget to Local Authorities (LAs) to pass on to schools as “smoothing” funding. Smoothing funding is allocated to LAs based on the number of schools in their area that have seen losses in their PDG allocations, for LAs to distribute to these schools. This has actively helped mitigate

the risk of schools facing a reduction in pdg funding as a result of decreases in learners eligible for free school meals.

## **Q2 - Evidence on Registration Trends**

This part of your request cannot be fulfilled because locating and reviewing all relevant analysis, assessments, and internal correspondence would exceed the cost limit set under the Freedom of Information Act. Please refer to the paragraph below for an explanation of how this decision was reached. However, data on the number of learners eligible for a free school meal annually is publicly available via the [StatsWales](#) website.

## **Q3 – Actions Taken to Protect Funding**

In addition to applying smoothing funding, the Welsh Government has undertaken a range of actions to safeguard the validity of the eFSM data set and registrations for free school meals. This includes Task and Finish-based activity with local authorities during UPFSM rollout to explore options for operationalising the offer while simultaneously mitigating risks to the eFSM Data set. Strengthening of UPFSM grant terms and conditions to identify the roles and responsibilities associated with supporting families to check for eligibility and register for a free school meal.

Additionally, through our '[Get Help with School Costs](#)' communication and marketing campaigns the Welsh Government continues to promote Universal Primary Free School Meals (UPFSM) whilst encouraging parents to check their eligibility for free school meals under the benefit-criteria and the school essentials grant.

If helpful I have also included a link to the [Beyond eligibility for free school meals \(eFSM\): data review \(summary\) \[HTML\] | GOV.WALES](#) which is a review of the need for and uses of data on learner socio-economic disadvantage.

## **Q4 – Guidance Issued to Schools and Councils**

As set out above, the Welsh Government has provided clear guidance to local authorities through the UPFSM grant terms and conditions, requiring them to continue or adapt processes for supporting families to check their eligibility and register for free school meals. These also require local authorities to capture data on those pupils eligible under the existing free school meal eligibility criteria. A copy of these can be found at the following link: [atisn24539.pdf](#)

Further, in 2023 we discovered that some pupils who were only receiving free school meals due to Transitional Protections or through the UPFSM offer had been incorrectly recorded as being eligible for free school meals via the means-tested criteria. We carried out an additional validation exercise to revise 2023 data. This is explained here: [Chief Statistician's update: updated data on pupils eligible for free school meals published following additional validation exercise | Digital and Data Blog](#). Data for 2020 to 2022 was also likely to have been affected by this issue, but it was not possible to go back and revise the data for 2020 to 2022.

Since 2023 we have developed additional validation rules which have helped to identify any issues with the FSM eligibility data at an earlier stage. We have included more guidance in the files sent to LAs in the validation period to say that pupils who

only receive free school meals due to TP or through the UPFSM policy must not be recorded as being eligible for free school meals via the means-tested criteria.

Lastly, regarding your second question asking for any analysis, assessments, or internal Welsh Government discussions that look at whether the number of families registering for free school meals has dropped since the universal offer began.

From my preliminary assessment I estimate that it will cost more than the appropriate limit set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 to answer your request. The appropriate limit specified for central government is £600. This represents the estimated cost of it taking over 24 hours of time to determine whether we hold the information and to thereafter locate, retrieve and extract it.

In order to provide you with the information that you have requested, we would need to conduct extensive searches across our iShare filing system and email archives to identify all analysis, assessments, and internal correspondence relating to free school meal registration rates since the rollout of Universal Primary Free School Meals.

Our initial search returned over 2,500 items. To estimate the time required, we conducted a sampling exercise: reviewing 25 items took approximately one hour. On this basis, reviewing the full set of more than 2,500 items would require well in excess of 100 hours, which significantly exceeds the statutory 24-hour limit. This estimate covers only the time needed to identify and locate information that would be caught by the request.

Consequently, I have decided not to provide you with the information you have requested at Question 2. However, I hope that the information I have provided has been helpful

Should you opt to submit a more refined request, for example, by focusing on a particular set of figures or analysis, this will be taken forward as a new request and considered against the criteria identified above (Freedom of Information and Data Protection (Appropriate Limit and Fees))

### **Next steps**

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit,  
Welsh Government,  
Cathays Park,  
Cardiff,  
CF10 3NQ

or Email: [Freedom.ofinformation@gov.wales](mailto:Freedom.ofinformation@gov.wales)

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office,  
Wycliffe House,  
Water Lane,  
Wilmslow,  
Cheshire,  
SK9 5AF.

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely