

Social research number: 25/2026

Publication date: 23/02/2026

Evaluation of the Welsh Government's Universal Free School Meals Policy: interim report

Executive summary

1. Introduction

The Welsh Government's commitment to Universal Primary Free School Meals (UPFSM) was announced in December 2021. This decision was made in response to growing concerns around food insecurity and rising cost of living pressures, which had been further exacerbated by the coronavirus (COVID-19) pandemic.

UPFSM ensures that all primary-aged children attending a local authority (LA) maintained school in Wales have access to a free school meal. During the rollout, the immediate aim was to ensure that all primary-aged learners who were not previously eligible could access a free school meal. The policy also, more broadly, aims to secure wider benefits, including improved nutrition, better health outcomes, reduced health inequalities, lower levels of child poverty and hunger, and enhanced educational attainment.

UPFSM was rolled out in phases from September 2022 to September 2024. The rollout started with the youngest years (Reception, Year 1, Year 2) as they were more likely to be living in relative income poverty ([Relative income poverty: April 2019 to](#)

[March 2020](#)). The first eligible cohort were children born on or after 1st September 2018. The offer was gradually extended to older year groups, with all LAs meeting the Welsh Government's final deadline of September 2024, despite varying rollout speeds.

2. Methodology

ICF Consulting Services Ltd. (ICF), in partnership with Arad Research, have been commissioned to evaluate the implementation and impact of the UPFSM policy. This report presents interim findings from the evaluation, which has taken a mixed-methods, theory-based approach. The report is informed by research activities conducted between January to September 2025, which comprised the following:

- semi-structured interviews with LA strategic leads from all 22 LAs, 8 school food providers and 9 wider stakeholders from health, education, research and poverty alleviation sectors
- in-depth case studies in 13 primary schools across Wales
- a survey of primary school senior leaders, with responses from 47 schools

3. Main findings

Implementation of UPFSM

Stakeholders broadly supported UPFSM, with most agreeing that all primary-aged learners should have access to free school meals. The policy was welcomed for its potential to reduce stigma for learners previously eligible for free school meals (eFSM) by removing visible differences between those who qualify for support and their peers. However, some Headteachers expressed early scepticism, questioning whether universal provision was the best use of resources. A minority of interviewed stakeholders suggested that support targeted at families just above the eFSM threshold might better address cost-of-living pressures.

In advance of the rollout, the Welsh Government asked LAs to assess their kitchens, infrastructure and readiness, using this information to help shape rollout milestones. Capital and revenue funding was also committed to support the infrastructure changes needed for the rollout of UPFSM, with allocations tailored to the size and needs of each LA.

While many schools benefited from kitchen upgrades, new equipment, more staff and updated digital systems, some schools reported facing major logistical challenges. This included reliance on off-site meal preparation, challenges with procuring equipment, increased administrative burdens and challenges recruiting staff. Several schools also reported adjusting staff hours, redeploying teaching assistants or administrative staff and hiring additional lunchtime supervisors to assist

with increased workloads relating to food preparation, serving and lunchtime supervision. However, respondents reported that recruiting and retaining part-time catering staff proved difficult, often requiring agency staff or incentives, which increased costs and created operational inconsistency. In some cases, LAs reported having absorbed unexpected costs or provided additional operational support to mitigate these pressures.

Many LA strategic leads reported that implementing UPFSM was challenging due to tight implementation deadlines for the first cohort and ongoing pressures on schools following the COVID-19 pandemic. These pressures were widely recognised across Welsh Government and LAs, reflecting a political commitment announced at pace and in a context of evolving information. Despite these challenges, the phased rollout was generally viewed positively, as it gave schools flexibility and time to prepare, particularly those requiring substantial infrastructure upgrades.

Procurement practices

The UPFSM policy includes an aim to support the Welsh food supply chain and local economy by increasing demand for locally produced ingredients and encouraging schools and catering providers to source food from Welsh suppliers. While this aim was generally viewed positively by interviewed stakeholders, in practice, several barriers were perceived to limit the extent of local sourcing. Rising food inflation, higher operating costs, limited storage and processing infrastructure and supply constraints were all cited as substantial challenges. Some school food providers highlighted that supermarkets often outbid schools for seasonal produce, while the limited size of the horticultural sector in Wales reduced the variety available. A lack of processing facilities and freezer space, as well as the additional labour required to use fresh produce, further complicated efforts to increase local procurement.

Several stakeholders also reported difficulties in defining what “local procurement” should mean in practice. Some gave priority to Welsh-grown produce, others focused on nearby suppliers regardless of national boundaries, and some used tiered models (e.g., county first, then Wales, then the United Kingdom).

Despite these obstacles, examples of good practice were reported. One large distributor has integrated smaller Welsh suppliers into its network, enabling more Welsh produce to reach school kitchens at scale. Additionally, initiatives such as the Welsh Veg in Schools project have been piloted to understand how best to strengthen supply chains and increase the use of locally grown produce in schools.

Uptake of UPFSM

The universal nature of UPFSM has removed financial barriers for many families, especially those just above the eFSM eligibility threshold. This has enabled more learners to access regular school meals and eased financial pressures on parents/carers. By July 2024, average uptake across Welsh LAs reached 69%, with

rates ranging from 57% to 82%. Uptake has gradually increased since the introduction of UPFSM, rising from 67% in September 2022, with the highest participation among younger learners who were eligible from the outset.

Stakeholders reported a range of factors contributing to increased uptake. Schools offering greater menu variety generally reported higher uptake. In many schools, staff also played an important role in encouraging learners through praise, rewards, taster plates and menu adaptations, though this was more challenging in larger schools. Additionally, some schools noted that UPFSM has helped create a more inclusive dining experience, normalising participation and promoting positive peer influence. Initiatives such as assigned seating and peer-led programmes have encouraged learners try new foods and adopt healthier eating habits, further supporting regular school meal uptake and promoting positive choices within the school environment.

The increase in learners taking up a school meal has placed further strain on lunchtime logistics, particularly in larger schools with limited space. Some schools reported this has resulted in longer queues, hurried eating and noisier dining environments, making supervision more difficult and limiting the time learners have to eat. In response, some schools have reorganised lunchtimes, such as serving in smaller groups or using additional service hatches, to create a calmer and more enjoyable dining experience. Smaller schools have generally experienced fewer disruptions, requiring only minor adjustments.

Increased meal uptake has, in some schools, placed extra demands on staff. These pressures reflect a combination of factors, including existing staffing and operational challenges, busier lunchtimes, and additional responsibilities. A few staff reported working beyond contracted hours or feeling under greater pressure, though experiences varied across schools. Some staff also reported additional pressures arising from managing a higher number of special diets due to associated health risks. Recruitment and retention challenges for staff persist, particularly for part-time roles and in rural areas.

Greater uptake has also driven demand for special menus and digital systems to register dietary needs. Schools reported using a variety of approaches to manage allergies and medical requirements, including bespoke menus, direct chef involvement, visual identification techniques and coloured trays for special meals. While several schools reported effectively meeting these needs, issues around cultural suitability (such as unclear halal options or untranslated menus) sometimes result in parents/carers providing packed lunches instead.

Impact on school administration

Several schools reported that UPFSM has reduced administrative burdens linked to managing dinner money debt, freeing staff to focus on core responsibilities and improving relationships with families. Morning routines have become more

streamlined, as staff no longer need to chase unpaid balances or manage payment systems, contributing to smoother day-to-day operations.

However, the policy has created new challenges for school planning and support for vulnerable learners. Some staff reported a perceived decline in eFSM registrations, which they attributed to parents/carers mistakenly assuming that registration is no longer necessary. Several factors may be contributing to the decline in eFSM rates, such as rising inflation alongside an unchanged eFSM threshold. This has, in a few cases, been reported to have affected school planning and resources, particularly in larger or more socio-economic disadvantaged schools, requiring additional communication efforts to ensure families continue to apply for eFSM so that vulnerable learners continue to receive the support they are entitled to. While UPFSM has simplified meal provision overall, the impact varies by school size and context, with larger and more socio-economic disadvantaged schools appearing to experience these pressures more acutely.

Impact on health and wellbeing

The introduction of UPFSM is generally perceived to have had a positive impact on learners' health and wellbeing, particularly for those from disadvantaged backgrounds and those just above the eFSM eligibility threshold. In several schools, staff and parents/carers observed that children who previously arrived at school hungry now receive at least one hot meal a day. Survey responses from senior school leaders, however, show mixed results: some schools, particularly in urban areas, have seen improvements in hunger and food insecurity, while others reported little change.

All school meals must follow the Healthy Eating Regulations, which set standards for the type of food and drink provided and their nutritional content ([The Healthy Eating in Schools Regulations](#)). The policy has exposed more children to balanced meals and a wider range of foods, helping to reduce perceived "picky" eating and encouraging healthier choices, including influencing the contents of packed lunches. Despite these benefits, some staff raised concerns that operational pressures may be affecting food quality, and that not all learners have equal access, particularly those with special dietary or cultural needs. These challenges may help explain why some learners and parents/carers continue to prefer packed lunches.

Some school staff reported modest but positive effects on learner behaviour and concentration resulting from UPFSM, noting that learners appear more settled, less hungry and better able to engage in afternoon lessons. Some parents/carers also observed improvements in their children's focus and participation at school due to having a meal. However, the impact on attendance remains unclear. Although some anecdotal evidence suggests that some parents/carers may give priority to attendance to ensure their children receive a meal, national data shows that

although the gap between eFSM learners and their peers has narrowed, it remains substantial.

Impact on family finances

Many stakeholders felt that the UPFSM policy has eased financial pressures on families, particularly those with multiple children, by removing the need to budget for school meals and packed lunches.

The policy is also reported to have eased financial pressures, particularly for families just above the eFSM threshold, while reducing stigma and promoting a more inclusive school environment. It was commonly reported among parents/carers in the case studies that it has also brought practical benefits, including saving time, simplifying routines, improving peace of mind and supporting healthier meal planning. Collectively, this contributes to a fairer and more supportive school experience for learners and their families.

4. Lessons learned and recommendations

Research to date suggests that UPFSM is broadly achieving its core aims of increasing access to school meals, having a positive impact on learners' health and wellbeing and supporting families. However, some schools and LAs continue to manage operational and logistical challenges associated with scaling up universal provision and achieving high uptake. The rollout of UPFSM has highlighted several lessons for implementation of UPFSM elsewhere, as well as for supporting continued uptake of school meals in Wales.

Clear and ongoing communication following rollout is essential for schools, LAs and families, including guidance that is accessible, multilingual and regularly updated, particularly as further changes to the Healthy Eating Regulations are introduced. Schools would also benefit from networks to share best practices for boosting uptake, including strategies related to menu variety, meeting dietary and cultural needs and engaging older learners.

Ensuring guidance continues to be provided to LAs on how to collect high-quality, standardised data and how they can use this to monitor uptake and understand uptake patterns across learners is essential. Improved data would help pinpoint groups of learners who may not be fully benefiting from the UPFSM offer and enable more targeted support where uptake is lowest. There is also a need to ensure that learners with eFSM status continue to access associated benefits through simplified registration processes, improved communication or rebranding of eFSM to highlight its wider support offer.

While there is strong support for sourcing Welsh and local produce, barriers remain, including supply chain limits, lack of processing infrastructure, and rising food costs. Developing and promoting a clear definition of what constitutes 'local' produce in

relation to school food procurement, piloting initiatives to increase local supply, and developing a long-term, sustainable procurement strategy could help overcome these challenges.

A busier lunchtime experience was also noted as a potential barrier to uptake. Practical measures, such as improving dining room layouts to ease flow or staggering lunchtimes, may help create a more relaxed and enjoyable lunchtime experience and encourage greater participation.

Finally, concerns were raised about the long-term impact of the policy without continued universal provision at secondary school level, particularly during the transition from primary to secondary. Exploring options to extend eFSM provision and/or assessing the feasibility of a universal offer at secondary level may be important to consider for ensuring the policy's sustained benefits.

Report Authors: Haysey, Nicola; Smiles, Beth; Falla, Dr Abby; Cooper, Priya; Cleaver, Rhydian Rolant; Cross, Roisin

Full Research Report: [Haysey, N et al. (2026). Evaluation of Welsh Government's Universal Free School Meals Policy: Interim Report. Cardiff: Welsh Government, GSR report number 25/2026]

Available at: <https://www.gov.wales/evaluation-universal-primary-free-schools-meals-interim-report>

Views expressed in this report are those of the researchers and not necessarily those of the Welsh Government.

For further information please contact:

Schools Research Branch

Social Research and Information Division

Knowledge and Analytical Services

Welsh Government

Cathays Park

Cardiff

CF10 3NQ

Email: SchoolsResearch@gov.wales

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