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Evaluation of Welsh Government's Universal Free School Meals Policy: Interim Report

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Evaluation of Welsh Government's Universal Free School Meals Policy

Interim Report

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

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Glossary

ALN

Additional learning needs

CIE

Counterfactual Impact Evaluation

EAL

English as an Additional Language

eFSM

Income-related eligibility for free school meals

FSM

Free School Meals

GP

General Practitioner

LA

Local Authority

LSOAs

Lower-layer Super Output Areas

MSOAs

Middle-layer Super Output Area

PDG

Pupil Development Grant

PLASC

Pupil Level Annual School Census

UPFSM

Universal Primary Free School Meals

TP

Transitional Protection

VfM

Value for Money

WG

Welsh Government

WLGA

Welsh Local Government Association

1. Introduction

In September 2024, the Welsh Government commissioned ICF Consulting Services Ltd. (ICF) in partnership with Arad Research to design and deliver an evaluation of the Universal Primary Free School Meals (UPFSM) policy in Wales. The overarching strategic goal of the evaluation is to provide comprehensive insights to maximise the impact of the UPFSM policy. This Interim Report presents the early findings from the first year of the evaluation, focusing on the process taken to implement the policy and any emerging outcomes and impacts. These findings will be further developed through research activities in the second year (2026) of the evaluation. Additional research will be reported on once the data collection activities have been concluded.

The evaluation has the following objectives:

- evaluate the effectiveness of the implementation of the UPFSM policy, including assessing the processes involved in the implementation, identifying barriers and facilitators experienced during implementation and identifying any unintended impacts/outcomes that have been experienced
- identify and explore emerging impacts of the policy, including potential equalities impacts, by examining how the policy is affecting learners, families, schools and wider stakeholders, and how different groups may be differentially impacted
- develop recommendations for maximising policy impacts and increasing uptake, including among those experiencing socio-economic disadvantage, by identifying the key factors influencing uptake and providing actionable recommendations to improve participation
- scope and present options for conducting a robust counterfactual impact evaluation (CIE) and value for money (VfM) assessment of the policy for consideration by the Welsh Government (to be reported separately)

The report is structured as follows:

- Chapter 2 outlines the policy context in which UPFSM was implemented
- Chapter 3 describes the methodology used for data collection and highlights any limitations
- Chapter 4 presents the findings from the process evaluation, focusing on the preparation and rollout of the policy
- Chapter 5 explores the emerging outcomes and impacts
- Chapter 6 concludes the report and sets out lessons learned and recommendations

2. Policy context

The commitment to UPFSM was announced by the Welsh Government in December 2021 and was set out in the Cooperation Agreement between Labour and Plaid Cymru ([Co-operation Agreement](#)). The policy emerged in response to growing concerns about food insecurity and the rising cost of living, both of which were exacerbated by the coronavirus (COVID-19) pandemic. During periods of school closures and holidays, many learners faced food insecurity, highlighting the need for more reliable and accessible food provision.

At the point UPFSM was introduced, the income threshold for means-tested free school meals (eFSM) had not been updated since 2019. This frozen threshold was believed to have contributed to a decline in the number of children qualifying for eFSM in Wales ([Free school meals in Wales](#)). For many families, eligibility was only maintained through Transitional Protection (TP) – a safeguard introduced when eligibility criteria changed, allowing children who previously qualified for eFSM to retain their entitlement, even if their household circumstances later moved above the threshold. TP ended on 1 January 2024, though learners eligible before this date were able to receive free school meals until the end of their current phase of education.

The political landscape influenced the policy's development, with local authorities (LAs) eager to implement changes quickly to benefit families. The initiative was also framed within the broader context of recommendations from the Annual Report of the Children's Commissioner for Wales (2020 to 2021), which urged a review of food entitlements in schools, including eFSM.

There is alignment between the Welsh Government's commitment to this policy and its broader governmental objectives in child poverty, healthier lifestyles and the wellbeing of future generations ([The Well-being of Future Generations](#)). UPFSM is part of Welsh Government's approach to tackling food insecurity in childhood and its associated challenges. The policy also aims to deliver wider economic benefits by using investment in the Welsh school food system to strengthen local supply chains, build resilience and increase scale ([Foundational Economy programme](#)).

The immediate goal of UPFSM during rollout was to ensure that all primary-aged learners who were not previously eligible could access a free school meal. This aimed to ease pressures on families struggling with the cost of living and to remove financial barriers to participation. By reducing the stigma associated with free meals, the policy also sought to increase uptake among learners with eFSM or TP status. Ultimately, by driving uptake across both groups, the policy aims to secure wider benefits: improved nutrition, better health outcomes, reduced health inequalities and enhanced educational attainment through the provision of a nutritious, balanced meal for all primary learners ([maximising the benefits of universal primary free school meals](#)).

2.1. Policy implementation

The UPFSM policy was rolled out in phases, beginning in September 2022, with the youngest primary school learners (Reception, Year 1 and Year 2) before being extended to

older year groups. This phased rollout was developed in collaboration with LAs to ensure that expansion could be delivered safely and consistently across Wales. To support this, the Welsh Government set national milestones and minimum standards, establishing a shared baseline of provision. This meant all LAs were required to reach at least the same minimum level of delivery at the same time. While some LAs were able to progress more quickly, this approach limited large disparities in access and ensured no area was left behind. Younger children were prioritised because they were statistically more likely to be living in relative income poverty. As a result, the first cohort eligible for UPFSM in Wales were children born on or after 1st September 2018 ([Relative income poverty: April 2019 to March 2020](#)).

The Welsh Local Government Association (WLGA) had a coordinating role in the rollout of the UPFSM policy by representing and communicating LA perspectives. They provided insight into how the policy was implemented across Wales, highlighting operational experiences and identifying any variations or challenges that emerged between different regions. This helped ensure that LAs' needs and circumstances were reflected in national discussions and supported greater consistency in delivery.

Pace of the rollout differed across LAs and regions. All LAs met the final rollout deadline set by Welsh Government of September 2024. However, progress differed: 13 LAs completed universal provision by September 2023, a full year ahead of schedule, and one LA achieved full rollout as early as April 2023. The remaining nine LAs delivered universal primary provision between January and September 2024. Annex 1 provides a breakdown of completion dates by LA.

LAs differ in the organisation and delivery of school catering provision. At the time of data collection (January 2025 to July 2025), 18 of the 22 LAs in Wales operated a LA catering service. In this model, the catering provider sits within the LA as an arm's length body where the team is responsible for delivering school meals and other public catering services. Two LAs had a trading company, and two contracted private catering providers to deliver school meals.

2.2. Policy funding

To enable and support the rollout of the policy, £182.2 million revenue funding was allocated across the 22 LAs over three years to support delivery: £23.2 million for financial year 2022 to 2023, £66.3 million for financial year 2023 to 2024 and £92.7 million in financial year 2024 to 2025 ([Welsh budget to provide free meals to all pupils in primary schools](#)). Funding is administered annually by a grant, which is paid directly to LAs. The grant offer allocated to LAs is demand-led and reflected their rollout pace and plans. It was intended to support delivery during each financial year. The revenue totals for each year by LA are presented in Annex 1.

A defined meal unit rate of £2.90 was applied consistently between 2021 to 2024, covering the early years of the rollout.

In August 2023, the Wales Centre for Public Policy published research commissioned by the Welsh Government to better understand the cost pressures LAs faced in delivering

UPFSM ([Understanding the cost of universal primary free school meals](#)). The research indicatively highlighted inflationary pressures affecting school meal provision, particularly rising food, energy and labour costs, and noted that prices remained elevated compared to pre-pandemic levels. However, it also emphasised that cost data were incomplete and variable, that LAs had managed costs in different ways, and that exact costs were difficult to quantify.

Following this review, the meal unit rate increased to £3.20 for allocations in the 2024 to 2025 school year. At the time of writing, the Welsh Government has announced a further uplift to £3.40 for the 2025 to 2026 and 2026 to 2027 school years ([Welsh primary school meals served with a £8 million boost](#)).

An initial £60 million in capital funding was allocated through the Sustainable Communities for Learning Programme to help LAs upgrade school catering facilities. This included £25 million in 2021 to 2022 and £35 million in 2022 to 2023, supporting investments such as new equipment, kitchen refurbishments and digital system upgrades. Additional capital funding was later provided on a business-case basis for larger infrastructure projects, including kitchen pods and new-build catering facilities. Since 2023 to 2024, this further investment has totalled just under £12 million, with an additional £6.5 million allocated through to 2026 to 2027. Paid-to-date figures for each LA are available in Annex 1.

Welsh Government also provided separate funding to LAs to undertake audits of their school kitchen estate, which were carried out either internally or through external contractors. These audits informed decisions on infrastructure improvements and highlighted areas requiring urgent attention. The audits revealed a lot of variation in kitchen infrastructure across Wales, which supported the decision to stagger rollout to ensure equity.

2.3. Other relevant policies

All primary schools in Wales are subject to the 2013 [Healthy Eating Regulations](#). The regulations set out nutritional standards and food and drink requirements throughout the school day as well as for an average lunch. Between May and July 2025, the Welsh Government held a consultation on healthy eating in schools, with the view to update what food and drinks can be provided in schools and the guidance and responsibilities for promoting healthy eating and drinking ([Healthy eating in schools](#)). At the time of writing, the revised Healthy Eating Regulations for maintained nursery and primary schools have been laid before the Senedd and are due come into effect in 2026.

3. Methodology

The evaluation follows a theory-based, mixed-methods design. A theory of change was developed at the inception stage, informed by an evidence review and scoping interviews with relevant stakeholders. A theory of change sets out the expected outcomes, mechanisms and contextual factors associated with the policy. It informed the evaluative framework for the study, clarifying what could be measured and why, and guiding data collection and analysis.

This report draws on the data collection activities completed to date. These are summarised below, with further detail provided in Annex 3. During production of the report, further context was provided by Welsh Government reviewers and has been incorporated into the report.

3.1. Semi-structured qualitative interviews

A series of semi-structured qualitative interviews were conducted to gather insights into the implementation and early impacts of the UPFSM policy. The sampling strategy targeted three core stakeholder groups:

- LA strategic leads for UPFSM across all 22 Welsh LAs
- school food providers involved in scaling up provision
- wider stakeholders from health, education, research and poverty alleviation sectors

Interviews were conducted online via Microsoft Teams and guided by a semi-structured topic guide aligned with the theory of change and evaluation questions. All interviews, with consent, were recorded, transcribed and thematically coded.

In total, 39 interviews were completed:

- 22 LA strategic leads (full coverage of Welsh LAs)
- 8 school food providers
- 9 wider stakeholders

Of these, 3 interviews were conducted in Welsh.

Interviews with LA strategic leads were conducted between January and March and lasted between 60 and 90 minutes. Interviews with school food providers and wider stakeholders were carried out between August and September 2025, lasting between 30 to 60 minutes.

3.2. School case studies

A two-stage sampling framework was developed to select 13 school case studies (see Annex 3.3 for technical details).

Stage 1: LA level selection

In the first stage, seven LAs were selected to reflect variation in the UPFSM delivery context, including school catering arrangements, school composition and wider community characteristics. Selection was based on criteria such as:

- proportion of urban areas
- proportion of eFSM learners
- deprivation affecting children (% of the LA's Lower-layer Super Output Areas (LSOAs) that fall within the most deprived 10% in Wales)
- proportion of learners of ethnic background other than White British
- number of schools, average learners per school
- proportion of Welsh-medium schools
- average UPFSM uptake
- timeline completion of final rollout and catering model

The seven LAs selected were: Blaenau Gwent, Cardiff, Carmarthenshire, Denbighshire, Isle of Anglesey, Vale of Glamorgan and Swansea.

Stage 2: Area-based school-level selection

Within these LAs, a range of schools were selected to ensure diversity in geography, socio-economic status, school type, size, language medium, and learner demographics (e.g., % eFSM, English as an Additional Language (EAL) learners). Practical considerations, such as school catchment areas and local population clusters, were incorporated alongside administrative boundaries (e.g., LSOAs) to improve representativeness.

3.2.1. Case study recruitment

Schools were contacted via email and phone between April and May 2025. A rolling recruitment process was adopted, allowing the next school on the shortlist to be approached if initial contact was unsuccessful. Pre-visit calls were arranged with headteachers to confirm schedules and answer questions. In total, 13 schools were visited during June and July 2025: eight visits spanned two days, while five visits were completed in a single day due to smaller school size.

3.2.2. Case study data collection methods

Each in-depth case study involved one or two days of qualitative research, including:

- interviews with school leadership
- interviews with lead chefs, kitchen teams and midday supervisors
- interviews with teachers and support staff
- focus groups or small-group discussions with learners (Years 3/4 and 5/6)
- opportunistic guided conversations with learners and staff
- observational research during lunchtime
- optional discussions with parents/carers, where feasible e.g., during school pick-up

Each case study was written up against a standardised template that synthesised data from all interviews, discussions and observations over the course of the visit. Findings were organised by stakeholder group (e.g., learners, parents/carers, teachers and catering teams). Relevant monitoring and survey data provided by the school were also reviewed to contextualise the qualitative findings. The case studies were structured according to the themes and questions set out in the topic guides.

3.3. School survey

Evidence shows that strong and visible senior leadership – such as actively engaging in lunchtime routines and shaping the food offer – is a critical determinant and enabler for high uptake of school meals ([More than a meal](#)). The school survey therefore aimed to gather the views of senior leaders (e.g., Headteacher / Deputy Headteachers or School Business Managers) as staff with knowledge and oversight of school meals.

The survey was piloted with two Headteachers. It was administered online (in Welsh and English) via Forsta, using a postal push-to-web method with QR codes and Tiny URLs to maximise engagement ([Forsta](#)). Follow-up emails and reminders to schools and LA strategic leads were used to boost response rates and ensure geographic and demographic coverage.

The survey was launched on 4 July 2025 and closed on 28 July 2025 and received responses from 47 schools, representing approximately 4% of all primary schools in Wales. Efforts were made to monitor the geographic and demographic distribution of responses to ensure a broad and inclusive sample. Following the closure of the survey, quantitative data were manually cleaned and analysed using descriptive statistics. Qualitative responses, collected through open text boxes, were thematically coded to extract main insights.

3.4. Study limitations and emerging research gaps

3.4.1. Study limitations

Several limitations should be considered when interpreting the findings.

Attribution challenges: given the short timeframe and the broad enabling nature of the policy, observed changes may reflect factors beyond UPFSM (e.g., post-COVID-19 recovery, wider educational initiatives). Despite attribution challenges, the combination of qualitative case studies, stakeholder interviews and survey data provides rich, triangulated evidence that helps to contextualise observed changes.

Timing of research: the evaluation took place after policy implementation, meaning details relied on stakeholder recall. Conducting interviews with LA strategic leads before carrying out case study visits in schools was critical to triangulate findings and obtain detailed, reliable data.

Survey response rate: while the survey provided useful insights, its low response rate limits representativeness. This may be partly explained by fact that it was introduced at the end of the school year. The depth of qualitative data from case studies partially mitigates this.

Coverage of school types: special schools were not included in the first-year qualitative design, which limits the applicability of findings to these settings. This will be a focus in the next phase of the evaluation (2025/26).

Access to stakeholders: engagement with some wider stakeholders, particularly from government and oversight bodies, was constrained by the timing of fieldwork. Engagement with these groups will be pursued in the next phase of the evaluation (2025/26).

3.4.2. Emerging research gaps

The first year of evaluation has identified several areas where further research is required to strengthen understanding of the policy's impact.

Parent/carer perspectives: More detailed evidence is needed on behavioural changes, impacts on family routines, and the financial implications of UPFSM, including time and cost savings experienced by households. This gap has been addressed through a survey that was distributed to parents and carers between October and November 2025.

Learners with additional learning needs (ALN): There is a need for more granular data on the experience and uptake of UPFSM among learners with ALN to ensure inclusivity and equity in policy implementation. Targeted research activities, such as visiting an ALN setting, will be considered in the next phase of this study.

Food waste: While food waste was identified as an issue prior to UPFSM, several stakeholders noted that the policy may have exacerbated this issue in some settings. Since meals are now free, more learners are choosing to take them; however, many stakeholders noted frequent instances of learners not liking the food on offer. This has, in some cases, led to greater levels of uneaten or discarded food. Understanding what, if any, actions LAs and schools have taken since the policy was introduced to mitigate food waste will be a focus in the next phase.

Whole-school food approaches: Whilst whole-school approaches to food were explored in the first phase of the evaluation, evidence remains limited on how consistently these approaches are being implemented, how they influence uptake of UPFSM, and their impact

on the wider school food environment. This will be further considered in the next phase of work.

Local procurement: While early consultation explored changes to food sourcing and procurement, further research is required to understand how these practices are evolving over time. The introduction of the new Healthy Eating Regulations, due to come into effect in 2026, provides a potential opportunity to examine how procurement decisions interact with nutritional standards and wider efforts to increase local food production in support of UPFSM delivery.

Monitoring and performance data: There is limited robust quantitative evidence on the policy's cost-effectiveness and overall efficiency. While the current evaluation provides qualitative insights into implementation, process, and emerging impacts, it does not yet quantify the financial costs, benefits, or relative value of the policy. As part of the evaluation, the feasibility of conducting a CIE and VfM assessment is being explored to identify appropriate methodologies that can address this gap.

4. Process evaluation findings

This Chapter presents the findings from the process evaluation, answering two questions from the evaluation framework:

- how effectively has the UPFSM policy been implemented
- how have LAs/the catering provider implemented changes to food sourcing and procurement practices following the rollout of UPFSM

The Chapter draws on a range of perspectives from LA strategic leads, Headteachers, school staff (including catering staff and lunchtime supervisors), parents and wider stakeholders. By exploring both the successes and challenges encountered during the rollout, the discussion offers insights into the practical realities of delivering universal free school meals at scale. It considers the initial reactions to the policy announcement, the nature and effectiveness of support and communication, the role of capital and infrastructure upgrades, staff recruitment pressures, approaches to promoting meal uptake and efforts to meet diverse dietary requirements. Additionally, the Chapter examines how LAs and catering providers have adapted their food sourcing and procurement practices in response to the increased demand and policy aims. Together, these findings present a comprehensive overview of the process and operational factors shaping the early implementation of UPFSM, highlighting both areas of progress and issues requiring further attention as the policy continues to evolve.

4.1. How effectively has the UPFSM policy been implemented?

4.1.1. Views on the policy announcement

There was widespread support for the policy across all stakeholder groups. The dominant view was that all primary learners should have the option to receive a free school meal. Reasons behind support for the policy varied: some LA strategic leads embraced the policy coming to Wales, while wider stakeholders felt that that universal provision helps to remove stigma and shame, which may be associated with learners who were previously a recipient of a free meal through eFSM. Results from the school survey reinforced this finding, with 91% of respondents (42 out of 46 respondents) indicating that the response to the policy has either been very or somewhat positive.

There was initial hesitancy and scepticism around the policy from Headteachers. For example, strategic leads from five LAs described debates among Headteachers around whether universal provision should be introduced. It was suggested that targeting support at those just above the eFSM eligibility threshold might have been more appropriate, as some families in Wales can afford a meal. Such an approach would primarily benefit learners affected by the cost-of-living crisis, but not already entitled to eFSM. This view was reinforced by a minority of staff and parents/carers engaged during school case studies, who questioned the universality of the policy, arguing that resources could be better directed towards the most disadvantaged families. One Headteacher expressed concern

that, because the policy also benefits more affluent families, it risked exacerbating inequalities if the most deprived learners continued to miss out on support.

4.1.2. Views on overall timelines and phased rollout

LA strategic leads described the timing of the policy announcement as particularly stressful, noting that they were given “tight timelines” for implementation. The policy was announced in December 2021, which strategic leads noted coincided with the Christmas break, limiting opportunities for immediate follow-up communication and planning. One strategic lead recalled:

“We knew at Christmas, but it took until about March to find out exactly how much funding we had. You can only plan so much without knowing the budget. That made the first few months quite messy.” LA strategic lead

Welsh Government officials similarly described responding, alongside LAs, to a political commitment that had been announced at pace. From this perspective, both Welsh Government and LAs were required to begin planning rapidly in a context of evolving information, including uncertainty around funding and delivery requirements.

LA strategic leads felt that the short lead-in time and tight rollout timelines added further pressure. Implementation was widely recognised as a daunting task, with some strategic leads contrasting the pace in Wales with Scotland, where free school meals for primary learners are being phased in over several years ([School Healthy Living Survey statistics 2022](#)). While the rollout in Wales was similarly phased, the full implementation had a much shorter timeline. A few wider stakeholders and chefs involved in the case studies also recalled initial concerns about the ambitious timelines.

Despite these pressures, the phased rollout was viewed as positive and necessary approach for successful implementation. Strategic leads noted that phasing gave schools additional time to prepare, helping most schools manage the process relatively smoothly. It also allowed flexibility for local contexts, including schools that required infrastructure upgrades (see Chapter 4.1.3).

Some challenges were reported in relation to the phased rollout. Differences in timing between LAs created temporary inequalities, with some children receiving free school meals before siblings in neighbouring LAs. Parents and carers of older learners in Years 5 and 6 were sometimes unaware when their children became eligible later in the rollout. A food bank representative described one example of a learner hiding food to take home for a sibling who was not yet eligible, highlighting the emotional and ethical issues this created:

“They would be seen stuffing food into their pockets to take home for their older siblings because they knew that they wouldn't have anything to anything to eat, which is just utterly, utterly heartbreaking”. Food bank representative, wider stakeholder interview

4.1.3. Communication and support

Building on the pressures described in Chapter 4.1.2, LAs' experiences of communication and support during the rollout of UPFSM were closely tied to the tight timelines and rapid

planning required. Several LA strategic leads reported that guidance from the Welsh Government on funding, rollout expectations or practical implementation were sometimes delayed, unclear or insufficient, requiring them to interpret and act on guidance independently. Formal support structures, including one-to-one sessions and national meetings, were in place but were not consistently referenced by participants, suggesting that LAs relied on informal networks and their own systems to manage delivery.

LA strategic leads highlighted a strong sense of mutual reliance with Welsh Government officials. LAs were expected to provide timely and accurate data to inform funding and planning decisions, while the Welsh Government shared updates as they became available from ministers. This interdependency, combined with the scale and complexity of the programme, meant that communication slippages were common early in the rollout, though openness and transparency were encouraged throughout.

Schools generally reported feeling well supported by their LAs. Case study participants described receiving practical assistance such as menu planning and advice on catering for allergies, and highlighted clear and regular communication with kitchen staff. At the same time, experiences with Welsh Government communication materials were mixed. Some schools found them clear and useful, while others reported that materials were too formal, text-heavy, or not parent/carer friendly. In many cases, school staff adapted, simplified, or translated materials to ensure accessibility for all families, particularly in more diverse communities. These adaptations added to administrative workloads but were seen as necessary to make the policy accessible and understandable.

Other actors, such as wider stakeholders involved in case studies, reported similar challenges. While Welsh Government officials emphasised their openness and efforts to provide guidance in a rapidly evolving context, stakeholders noted that communication delays and inconsistencies created additional pressures for LAs and schools. Requests for more detailed, practical guidance – particularly on issues such as managing special diets, allergens and increased administrative tasks – were noted as areas where support could have been strengthened.

4.1.4. Capital/infrastructure upgrades

The Welsh Government recognised that infrastructure changes were required in some schools to rollout UPFSM and made funding available for this. Most LA strategic leads cited capital and revenue funding from the Welsh Government as a primary enabler for the policy's success, allowing for upgrades to kitchens, along with equipment, staffing and updating digital systems. £71,856,845 in capital funding was allocated between 2021 to 2026. Most of this funding, £60 million, was allocated as part of the Sustainable Communities for Learning Programme budget (£25 million in 2021 to 2022 and £35 million in 2022 to 2023) ([Sustainable Communities for Learning rolling programme](#)). The allocations per LA by year are available in Annex 1.

In advance of the rollout, the Welsh Government requested that LAs undertake planning, audit and engagement activity locally to inform how rollout of the commitment might be planned and delivered on a national scale. They provided £1.5m to support this activity,

which included surveys of kitchens and wider infrastructure. LAs were asked to assess their capital requirements, identify what was needed within their operating context and determine when they could roll out the policy and the timeline for doing so. Findings from these surveys were reported back to the Welsh Government and were a primary driver of the staging and pace of national rollout.

LA strategic leads viewed these surveys as essential for a successful rollout. One LA strategic lead noted that the funding from the Welsh Government was used to commission a contractor to survey kitchens to assess existing equipment, which informed capital investment, highlighting the need for more building maintenance funding. Similarly, another strategic lead mentioned that audits and surveys laid the groundwork for a smooth rollout. One LA strategic lead felt that the surveys were essential because of an underestimation of the state of school kitchens from the Welsh Government.

The need for infrastructure upgrades varied greatly across schools. Some had sufficient kitchen space and equipment to accommodate the increase in meal production, whereas others required substantial developments to manage the scale-up. This variation is reflected in the capital funding allocated to LAs, which ranged from £1,145,098 (1.6% of total funding) to £10,145,803 (14.1%). These differences largely relate to the size of each LA and the number of schools requiring additional capacity.

In schools where upgrades were needed, case study examples included installing new ovens, expanding serving areas and adding extra serving hatches. Often, these works were scheduled during school holidays to minimise disruption. For example, one case study school reported having new equipment and ovens installed over the summer period. Similarly, the Headteacher from another case study school noted that the kitchen was refurbished over the summer holidays in preparation for the increased uptake and reported that there was minimum disruption to the school.

At least one case study school experienced major disruptions due to the upgrades. The school underwent a full kitchen refurbishment to accommodate the increased number of learners having school dinners. The Headteacher noted that the project was initially planned without fully considering the kitchen's capacity, resulting in a four-month period of disruption. New ovens required more electricity than was available, causing power supply problems that had to be resolved through negotiations with a local landowner. Additional delays and costs arose when asbestos was discovered. The Headteacher described the situation as a "nightmare no one could have anticipated", highlighting the scale and complexity of such upgrades.

During this period, kitchen staff prepared lunches off-site. While the head chef did not find this operationally difficult, it placed a strain on administrative arrangements. For example, adjustments to the traffic management plan were needed to transport hot meals safely and all learners had to eat in a single room, extending lunchtime. In the aftermath, with large overspends incurred, the Headteacher questioned whether the refurbishment was the best use of funds. If the funding had been directed to education and the school more broadly, other priorities (such as teaching support, staff pay or urgent building repairs, including a leaking roof and failing boiler) might have been better addressed.

Available capital funding was also used to procure additional kitchen equipment. Some LAs reported difficulties securing this equipment, with supply chain disruptions during the COVID-19 pandemic and the Ukraine war creating delays. LA strategic leads noted that schools that implemented the policy later were particularly affected, as earlier adopters had already claimed available stock, leaving fewer options and longer lead times. A school food provider spoke about their LA having a dedicated project officer to address equipment needs in each school. This was done through a survey of what was needed in each school. It was further noted that, in this one, specific case, the LA absorbed some of the unexpected costs for the kitchen equipment. In some LAs, the surveys enabled bulk purchasing of equipment. The anticipated benefits included securing more competitive pricing and supporting more proactive planning, though it was not confirmed through interviews with LA strategic leads whether these benefits were realised in practice.

4.1.5. Recruitment

The rollout of UPFSM was informed by regular updates from LAs on their readiness to deliver across year groups, which also considered workforce capacity and recruitment alongside other operational requirements.

While national rollout milestones were based on this information, some schools and catering providers still reported pressures from the increased demand for staff resulting from UPFSM. While recruitment requirements were considered as part of the capital requirements needed for the rollout (see Section 204.1.3), the rise in the number of lunch meals was reported in several cases to have increased workload for food preparation and serving, as well as the need for additional lunchtime supervision. To manage these pressures, some schools made changes to existing staff hours and roles. For example, in some case study schools, teaching assistants or administrative staff were reassigned to the canteen; these temporary changes reverted once recruitment for additional kitchen staff was complete. In other schools, additional lunchtime supervisors were hired, or existing staff hours were extended, to meet the ongoing demand from the increase in number of learners receiving a school meal.

In LAs that directly employed catering staff, the types of roles being recruited to were mostly part-time, flexible, term-time roles, which were often difficult to fill. Many LA strategic leads noted that demand for staff frequently outpaced the ability to recruit, while some relied on agency staff, reorganised teams, adjusted hours or offered incentives to attract and retain staff. A reliance on agency staff was reported to have increased costs and introduced inconsistencies in lunchtime operations. It is unclear if similar pressures also existed in cases where schools had contracted private or in-house catering models. Ongoing challenges related to recruitment and the retention of staff are discussed in Chapter 5.2.2.

4.1.6. Promoting uptake

Uptake is an important indicator of successful implementation of UPFSM, as the policy's impact depends on learners participating in school meals. This sub-section focuses on how schools and LAs supported uptake, including strategies to engage learners, communicate

with parents and carers, adapt menus and manage dietary needs. Findings on the levels and patterns of uptake are presented in Chapter 5.1.

Practical lunchtime strategies: menu variety and picky eating staff-led support played a central role in encouraging uptake, especially for perceived “picky” eaters. “Picky” eating behaviours were understood to not be related to any specific dietary requirements or ALN, but the preferences of learners. Some schools introduced strategies such as verbal praise, reward systems, taster plates and gradual exposure to new foods to build confidence and broaden preferences. Catering staff adapted menus and presentation to make meals more appealing while complying with the Healthy Eating Regulations. The level of support varied, with larger schools facing greater challenges in providing personalised encouragement. In some schools, staff gave priority to ensuring learners ate some food over changing eating habits, particularly in higher eFSM areas.

Where the responsibility lay for “picky” eating behaviours was debated. Some parents and carers felt schools should encourage children to try a wider range of foods throughout the week. School staff, however, often felt that promoting dietary variety was primarily the responsibility of parents and carers, as this is not a priority during lunchtime. Parents and carers involved in case studies expressed mixed views on menu choice. Some valued a wide range of options because it reassured them that their child would always find something to eat. Others argued that offering too many choices reinforced “picky” habits, allowing children to select the same meal repeatedly, particularly when familiar options such as pasta or sandwiches were available daily. Wider stakeholders were similarly sceptical about offering a large number of options each day and encouraged fewer choices with a variety over the days to encourage learners to try different foods.

4.1.6.1. Meeting dietary needs/requirements

The expansion of UPFSM has led to a marked increase in the number of learners taking school meals. As uptake increased, some schools and catering providers reported a corresponding rise in the volume and variety of dietary needs. While dietary needs such as allergies, intolerances, medically prescribed requirements and, in some cases, sensory-based needs linked to neurodivergence are not new, the increased number of learners accessing school meals has made these needs more operationally demanding¹.

Stakeholders reported that this increase in scale has introduced greater complexity in delivery, particularly for catering teams. Some schools noted that accommodating a higher number of learners with specific dietary requirements has increased workload (see Chapter 5.2.2), especially in relation to information management, communication with parents and carers, and regulatory compliance. Where schools managed dietary requirements effectively, learners with allergies or other specific needs were more likely to participate in UPFSM, supporting higher overall uptake.

¹ Managing the increased volume of dietary needs also required schools and catering providers to balance compliance with the Healthy Eating Regulations with their duty to make reasonable adjustments under the Equality Act 2010. Substantive exemptions from the Regulations are typically linked to medically prescribed dietary requirements supported by evidence, while minor adaptations are more commonly made within the existing regulatory framework.

In response to the increased number and diversity of dietary needs, many LAs and catering providers reported strengthening or formalising their processes during the rollout of UPFSM. Although systems were often already in place prior to implementation, there was a greater emphasis on the use of medical evidence to support requests for alternative or adjusted meals. This was widely viewed by case study participants as necessary to differentiate medical requirements from dietary preferences. In some areas, digital systems were introduced to allow parents and carers to upload medical evidence directly. For conditions that may take longer to diagnose, including some linked to neurodivergence, LA strategic leads and wider stakeholders reported that interim evidence, such as a doctor's note confirming that a learner is on a diagnostic pathway, may be accepted.

Approaches to managing dietary requirements varied depending on catering arrangements. One large catering provider was praised by a case study school for its structured process, in which parents and carers complete a standard form detailing a learner's dietary needs. This information is then used to develop a bespoke menu for the individual learner, complying with the Healthy Eating Regulations where applicable. In another school, dietary requirements were reported directly to the school chef, who recorded the information and adapted meals accordingly (within the framework of the Healthy Eating Regulations).

At the point of service, staff described a range of practical measures introduced to manage the increased number of learners with specific dietary needs safely and efficiently. These included the use of colour-coded trays to distinguish meals and visual prompts, such as photos of learners with special meal requirements, to temporary reallocation of staff hours or roles to support food preparation and service. Findings from the school survey suggest that, overall, schools are responding effectively to meeting dietary needs/requirements: 87% of respondents (40 out of 46) agreed or strongly agreed that special diets and medical needs are catered for at their school.

Across Wales, stakeholders welcomed the ability to register allergens through LA systems, which was seen as supporting consistency at scale. However, some schools expressed concerns that holding dietary information primarily at LA or catering provider level, rather than within schools, could limit wider staff awareness of individual learners' needs, particularly where communication occurred directly between LAs and catering teams².

As the number and diversity of learners taking school meals increased under UPFSM, staff in some case study schools and parents and carers highlighted cultural suitability and communication as additional factors that needed to be better managed. Specifically, some parents and carers reported that unclear information about halal options, limited translation of menus or uncertainty about ingredients influenced their decision to provide packed lunches instead. Although menus are often available in advance, allowing families to make informed choices, several case study schools noted that a lack of cultural variety in lunchtime provision could affect whether learners from different backgrounds found the food appealing or familiar. For example, white bread sandwiches were cited by case study

² Substantive exemptions from the Regulations are typically linked to medically prescribed dietary requirements supported by evidence, while minor adaptations are more commonly made within the existing regulatory framework.

schools as an option that may be culturally unfamiliar or unappealing to some ethnic communities, with implications for participation despite increased availability.

4.1.6.2. Parent/carer engagement

The introduction of UPFSM prompted some schools and LAs to strengthen parent/carer engagement and communication about school meals, recognising that uptake can be influenced by perceptions and awareness. Case study school staff reported that many parents/carers held outdated or negative views of school meals based on their own experiences, leaving some unaware of the quality and variety now offered. Limited clarity about specific options (for example, halal meals not being clearly advertised) was reported to lead some families to opt for packed lunches rather than school meals, demonstrating how effective communication can directly influence UPFSM participation. Some case study schools therefore implemented initiatives such as tasting sessions, online menu systems, pre-order apps and sharing photos of meals to improve transparency and build parent/carer confidence in the school meal offer. These efforts have helped reassure parents, give them greater visibility and control, and encourage more positive attitudes towards school meals.

Challenges around transparency reportedly remain. A few parents/carers in some case study schools reported limited awareness of what their child had eaten for lunch, especially in instances where learners could change their choice on the day despite pre-selecting an option online. There was also little visibility of how much of the meal was consumed or wasted. This was supported by a case study school with a manual ordering system where families do not need to order a school lunch in advance. Here, staff involved in the case studies reported instances where learners brought a packed lunch but then also took a school meal, or had the same meal repeatedly. This was difficult to track and contributed to the perception of limited visibility among parents/carers of how much of the meal was wasted. One qualitative response from the school survey highlighted an example which further supports this:

“Parents will book their child a lunch but may give them sandwiches (or they could be fasting). They don't mind that a meal is being prepared and ultimately wasted as they are no longer paying for it”. School business manager, school survey

4.2. How have LAs/the catering provider implemented changes to food sourcing and procurement practices following the roll-out of UPFSM?

Changes to sourcing practices are central to understanding how UPFSM has been implemented, including how LAs and catering providers adapted supply chains, contracts and menu planning to deliver higher meal volumes while meeting policy objectives for quality and sustainability. However, LA strategic leads reported differing interpretations of what counted as ‘local procurement’. Specifically, views varied on whether the priority should be given to Welsh products or more broadly to ‘local’ products, an issue particularly relevant for LAs bordering England. Most LA strategic leads defined ‘local’ by distance but gave priority to sourcing from within Wales where feasible and appropriate. Some used a tiered definition, with the first preference being the county or region, then Wales, then the

United Kingdom (UK). As part of this justification, supporting local farmers, producers and businesses were seen as vital.

Encouraging local procurement as a policy aim was widely viewed as positive, especially among school food providers and case study participants. Respondents from case study schools were positive towards increasing the use of Welsh produce, especially with regards to the cultural and educational value. For example, in one case study school there were Welsh-themed days where the Welsh produce was promoted, linking the food that was being eaten to the Welsh culture. Moreover, school food providers positively highlighted the desire to support the Welsh economy and promote local identity. However, it is not always possible or realistic to procure Welsh produce.

4.2.1. Barriers to local procurement

Evidence on how food sourcing and procurement practices were implemented as part of the UPFSM rollout was limited. Most interviewees had little direct insight into procurement decisions; where there was awareness, it typically related to wider LA-level procurement, rather than primary-school-specific arrangements.

Rising food inflation and higher operating costs were reported to limit the extent to which schools could source food locally. While the unit rate was increased by 10% from £2.90 to £3.20 in December 2023, at the time of collecting data for this report, there had been no further increases despite ongoing inflation ([Final Budget 2024 to 2025](#)). The unit rate has since been increased to £3.40 for allocations for the 2025 to 2026 and 2026 to 2027 school years ([Welsh primary school meals served with a £8 million boost](#)). School food providers highlighted that, without further school meal funding increases aligned with increasing food costs, the sustainability of local procurement is threatened. Ingredients such as meat, particularly chicken, were perceived to be cheaper when purchased from abroad, and supermarkets were reported to outbid schools for seasonal items, making local sourcing more challenging.

Some school food providers noted that, while there is interest in using more Welsh produce, this would require additional financial support or subsidies to avoid straining school budgets. Providers expressed concerns that, under current cost pressures, schools might revert to cheaper, non-local options, potentially undermining both meal quality and local economic benefits. They also reported that some local suppliers have become increasingly reliant on UPFSM-related demand. Any delays in funding or cost adjustments could therefore risk reducing orders or pushing procurement back toward non-local suppliers.

Wider stakeholder interviewees noted that the limited range of produce farmed in Wales can be a barrier to local procurement. While dairy and meat production is high, horticulture farming is limited, reducing the variety of produce farmed in Wales. Regarding bakery products, staff in some case study schools questioned the practicality of sourcing exclusively from Wales, noting the proximity of many bakeries in neighbouring Shropshire and Staffordshire.

Storage constraints within schools were also reported to limit the use of fresh local produce. A sustainability expert noted that the peak of agriculture season is in the summer, and limited freezer space causes issues in storing the produce until after the summer break. Fresh ingredients can also have an impact on the workload of the school chefs. While cooking from scratch has benefits such as improved nutritional quality, it can also increase

waste, time and effort, as observed by one school food provider. Shifting towards fresh ingredients more generally was noted to cause a substantial change from the types of meals many chefs are accustomed to preparing. Raw meat, in particular, was highlighted as presenting challenges due to spoilage risk, trimmings and higher levels of unavoidable waste.

A lack of processing infrastructure was also mentioned by school food providers and wider stakeholders as a barrier to local food procurement. Even when produce is available from Welsh farms, facilities to clean, prepare and process it for use in school kitchens are limited. Wider stakeholders reported that investment in processing and storage facilities is essential to expand the use of Welsh produce. Moreover, one LA strategic lead noted that additional staff time and expertise are needed to manage local procurement and prepare fresh, local ingredients. Staff in two case study schools (in the same LA) also spoke about how the closure of a local abattoir had previously forced a shift away from local sourcing, and this issue remains unresolved following the introduction of UPFSM.

While some stakeholders commented on general barriers and enablers to local procurement (discussed above), few described how these factors specifically shaped or influenced implementation processes. 43% of school survey respondents (20 out of 46 respondents) indicated that there were no changes in the proportion of Welsh food on the menu since UPFSM (18 out of these 20 respondents had a LA catering provider), with 22% (10 out of 46 respondents) indicating that they did not know (9 of these 10 respondents had a LA catering provider).

4.2.2. Facilitators for local procurement

There is some evidence that large distributors can help facilitate local food procurement by addressing one of the main barriers for small producers: logistics (see above for a barrier relating to logistics). An example was provided by a wider stakeholder of a large company integrating smaller Welsh suppliers into their existing distribution systems. This has effectively “filled gaps in the farm-to-fork chain”, enabling more Welsh produce to reach school kitchens at scale. This collaborative model allows local sourcing to be both practical and reliable within the constraints of public sector catering.

Several pilot initiatives supported by Welsh Government have sought to explore approaches to increasing local food procurement and supporting small producers. These pilots aimed to strengthen supply chains, improve access to Welsh-grown produce, and test practical models for scaling up local sourcing in schools. For example, Welsh Veg in Schools is a project coordinated by Food Sense Wales (and funded by Welsh Government's Backing Local Firms Fund), which aims to increase the amount of organically produced Welsh-grown vegetables served in primary school meals across Wales ([Welsh Veg in Schools](#)). Starting in 2022, it works by reshaping supply chains to give priority to local growers, reduce reliance on imports and strengthen Welsh food resilience. In 2022, only 6% of vegetables bought for the public sector were sourced locally in Wales whereas in 2024, Welsh Veg in Schools served 200,000 portions of fresh, organic vegetables in more than 200 schools. A wider stakeholder commented on the importance of this initiative to strengthen links between schools and local farmers and to take a whole-system view, connecting the classroom learning with farming and food production.

As mentioned previously, stakeholders generally reported that Welsh dairy and meat supplies are abundant, with a robust supply chain capable of scaling up to meet higher

demand. At the time of research, two school food providers noted that they were experiencing no challenges in meeting current demand. Wider stakeholders and school food providers also suggested that the local nature of procurement may make the supply chain less vulnerable to external shocks. In the event of extreme weather, for example, both producers and schools would be affected by the same disruption, meaning that if produce could not be distributed, schools would be unlikely to open anyway. However, this is likely only applicable where the produce is prepared on-site. As noted earlier, the lack of local processing infrastructure remains an important barrier to expanding the use of Welsh produce.

5. Emerging outcomes and impacts

This Chapter explores the emerging outcomes and impacts found in the first year of this evaluation. These findings are preliminary and will be explored in greater depth as the evaluation progresses.

5.1. How has UPFSM impacted take up of school meals?

This sub-section presents data on the proportion of learners taking school meals since the introduction of UPFSM (see Chapter 18). It highlights trends over time, differences between year groups and LAs, and patterns in uptake linked to learners' exposure to the universal offer.

There are important limitations to consider when interpreting the data. Uptake is calculated as the number of meals served, expressed as a proportion of the total meals that could have been served if every learner on roll had attended school. This method assumes 100% attendance and does not account for actual attendance, which averaged 8.5% in 2022/23 and 7.9% in 2023/24 ([Absenteeism from primary schools](#)). As a result, uptake is underestimated. All figures in this report are based on the assumption of full attendance for consistency, but must be treated with caution.

Another limitation is the absence of comparable data on uptake prior to the implementation of UPFSM. This lack of baseline information makes it difficult to assess long-term changes or to compare current uptake with previous patterns.

5.1.1. Levels of uptake of UPFSM³

Data from July 2024 show that there continues to be differences in school meal uptake across LAs. Average uptake for July 2024 was 69%, ranging between 57% and 82%. This marks an increase since the offer first became available to learners in Reception in September 2022, when uptake was 67%. It is worth noting that these two points fall at the beginning and end of the school year, and seasonal factors such as attendance patterns or school activities may have a small effect on uptake.

The upward trend is likely explained by the staggered rollout, which began with the younger years. Staff interviewed in case studies observed that uptake was lower when the policy extended to older year groups, as these learners were less accustomed to having school lunches. In contrast, learners who have had the offer throughout their school life show higher uptake. LA strategic leads reported similar patterns: the highest uptake tended to be among the younger years, with a noticeable drop off for Years 5 and 6 during rollout. They expect that continued implementation of the policy will sustain early exposure benefits, with the number of learners receiving UPFSM likely to rise as younger cohorts move up through the system.

³ This Chapter focuses exclusively on meals offered under the UPFSM provision and does not include figures on eFSM or TP.

5.1.2. Influence of a universal offer on uptake

The universal provision of free school meals under UPFSM has reportedly been a primary enabler of uptake of school meals. By removing cost as a barrier, access to school meals has broadened, particularly for families who struggle financially but are not eligible for eFSM. Case study participants and LA strategic leads reported that this policy specifically benefits families just above the eFSM threshold. For example, staff in one case study school explained that learners who they knew previously experienced food insecurity can now consistently access meals. Similarly, one LA strategic lead described how, prior to the policy, some families just above the eFSM threshold with two or three primary-aged children had to rotate who received a school meal, as they could not afford meals for all.

While uptake among eFSM learners remains low in some areas due to absence rather than cost, for most families the decision to participate is primarily financial. This was felt across case study schools, with one Headteacher emphasising that “the nature of it being universally free is quite self-promoting”. Additionally, the financial benefit of parents/carers not having to buy a packed lunch or pay for school dinners was highlighted (see Chapter 5.5). This is supported by four respondents to the school survey who qualitatively indicated that, as the offering is free, parents/carers make good use of it.

In some schools, the universal offer was also perceived to have created a shared dining experience, with more learners eating together and participation becoming the norm rather than the exception. This shift in social norms has reportedly amplified peer influence, with learners often choosing the same foods as their friends or copying what others are doing.

Parents/carers and staff across several case study schools highlighted that this social dynamic encourages children to try new foods. For example, one learner explained that they were initially hesitant about vegetarian nuggets but, after a friend praised them, they have now become their favourite school meal. Some parents/carers reported that these interactions have also had knock-on effects on their children’s eating habits at home, making them more willing to experiment with different foods.

“Children are willing to try dinners when watching their friends eat the food. They want to copy their friends or are just influenced by each other”. Parent/carer, case study

“Having a lot of friends around them eating the same thing as them was a big turning point I think it helps influence their opinions over food as well”. Teacher, case study

Some schools have reinforced these positive behaviours through changes to lunchtime organisation and peer-led initiatives since UPFSM was introduced. In one school, for example, assigned seating in “family groups” has replaced free seating, which teachers reported helps learners feel secure while encouraging interaction beyond their usual friendship circles. One parent/carer praised the approach, saying it helped their child “feel safe having their designated space”.

One other example was the introduction of a ‘Lunch Crew’ initiative in one school, which further supported healthy eating habits. Year 6 learners wear branded aprons and serve items such as salad, bread and couscous at the salad bar, modelling good behaviour and

promoting healthy choices. These strategies, combined with the universal offer, were said by staff within the school to help normalise school meals and amplify opportunities for peer modelling, highlighting the social environment as an important factor when looking at uptake.

5.2. What are the emerging impacts of the policy on school life?

As an enabler policy, evidence suggests that the success of UPFSM depends on certain conditions and effective implementation. It requires a supportive environment to work as intended and prevent unintended negative consequences. For example, research shows that inclusive lunchtime organisation and well-designed dining spaces allow all learners to take up a school lunch in enough time for healthy play and development ([Williamson et al., 2013](#); [Nijhof et al., 2018](#)). UPFSM is also more effective when implemented alongside a whole-school food policy ([Bryant et al., 2023](#)). It can also act as a catalyst for improving these policies by opening up conversations with governing bodies, school catering providers, school leadership, learners, parents/carers and teaching staff about what is served, why and when.

This sub-section explores the emerging impacts of UPFSM on school life. For the purposes of this sub-section, 'school life' refers to the day-to-day experiences of learners in school related to meals and the lunchtime environment. This includes not only the act of eating and the food itself, but also the social, educational, operational and emotional aspects of mealtimes, as well as how school policies, staff practices and peer interactions shape these experiences.

5.2.1. Impact on the lunchtime experience

The introduction of UPFSM has increased the number of learners taking up school meals (see Chapter 5.1), which has placed pressure on lunchtime logistics in many schools. Few staff and learners across case study schools reported longer queues, rushed eating and a more chaotic dining environment resulting from higher volumes of learners accessing a school meal. This has reportedly been the case particularly in larger schools with limited space and shared facilities, despite the capital funding received from Welsh Government to improve kitchen and dining capacity and support effective rollout (see Chapter 4.1.3). Staff across several case study schools report challenges in maintaining supervision, supporting healthy eating behaviours and ensuring learners have enough time to eat, with some learners feeling hurried or leaving food uneaten.

“Because we’ve got to get 300 children through, it’s very much like: we get them in, they sit, when they finish, they go out to play, just not as if we wait for a table to finish or whatever. Once they finish, they scrape their plates – the older ones do – stack their plates and then they’ll go straight out to play”. Headteacher, case study

Kitchen staff across several case study schools observed that busier lunchtimes have a bigger impact on younger learners, who they report need more support with hot meals than packed lunches, such as in choosing their meal, using cutlery and getting help with carrying their tray back to their tables. Learners also echoed this, with some in one case study

school stating that oftentimes the 30 minutes allocated to queue for and then eat lunch is insufficient, particularly for the younger year groups.

There were also some reports from parents/carers and learners in a few case study schools that older learners sometimes felt rushed at lunchtime because they were served later in the sitting, leaving less time to eat before going out to play or getting back to class. While schools typically set lunch length and often use rotas to vary which year groups eat first, some learners and parents/carers reported that longer queues resulting from higher numbers of learners taking up a school meal primarily affected older learners as they still tend to be served last. For example, one parent described how her children (Years 5 and 6) are “starving” when they come out of school because they have been rushed. Learners reported that long queues and limited time between classes often leave them waiting even after joining the lunch line. In another school, learners reported opting for packed lunches due to long queues for school dinners. Interviewed public health and nutrition experts reinforced this point, noting that long queues and noisy lunch halls can deter sensitive learners from eating a school meal, prompting them to bring packed lunches to avoid feeling overwhelmed.

“The actual serving of meals takes a bit longer than people think”. Lunchtime supervisor, case study

In response to the increase in the number of learners taking up school meals, some schools have reorganised their lunchtime arrangements to make the lunchtime environment less chaotic. Staff in one case study school reported serving two year groups at a time, using an additional service hatch, with each group allocated more time to collect their food and eat. Previously, the school aimed to move learners through the dining hall as quickly as possible, but this often left learners feeling rushed. The Headteacher explained that the new approach has made the dining experience far more positive, noting:

“They didn't get to sit down in one place and it (was like) a conveyor belt an important thing for us as a school is that our children get an opportunity to sit and eat their lunch, take time, enjoy it, and chat with their friends because we know a lot of our children don't have that opportunity at home to sit down and really enjoy it”. Headteacher, case study

Case study evidence revealed that smaller schools experienced fewer disruptions to lunchtime services following the introduction of UPFSM. This was largely because the changes needed were minor and did not have the knock-on impact on the lunchtime environment, staffing or learner's experience. One smaller case study school, with fewer than 100 learners, reported that younger learners now come for lunch a little earlier, so they have enough time to finish their lunch before the older learners arrive. However, they noted that this change has not affected the rest of the school's routine.

Findings from the school survey support this picture of how UPFSM has influenced learners' lunchtime experiences. Since UPFSM was introduced, 17% (8 out of 47 respondents) say learners enjoy lunchtime more, 64% (30 out of 47 respondents) say enjoyment has stayed the same and 17% (8 out of 47 respondents) report less enjoyment. Yet when broken down by school size, 4 out of 9 Headteachers in slightly larger schools (those with 301–500

learners) reported lower levels of enjoyment, suggesting that these schools face greater pressures as a result of the policy. However, the small sample size limits the strength of this finding.

5.2.2. Impact on staff workload and wellbeing

The increase in the number of meals prepared and served as a result of UPFSM has placed additional demands on school staff and catering teams. In some schools, kitchen staff reported that the workload was manageable and expressed satisfaction with their job conditions. This was particularly true in smaller schools where only minimal staffing changes were needed, though similar feedback was noted in one larger case study school as well. However, there were a few reports of increased pressure on staff resulting from busier lunchtimes and having to serve learners more quickly, with some staff working beyond contracted hours, feeling rushed or devalued. While these accounts may not reflect the experience of all staff, they offer a snapshot of the challenges observed across Wales. Processes which were taken to recruit staff for the rollout are discussed in Chapter 4.1.4.

“We have the same amount of time to serve twice the amount of children”. Chef, case study

In some schools, workload has risen sharply without corresponding increases in staffing, hours or pay. For example, one chef reported that meal numbers rose by 24–30% (from around 170 to 215 per day) with no additional staff, space or time, leaving kitchen teams feeling devalued and under strain. Staff are often paid minimum wage and, in some cases, stay beyond contracted hours to complete tasks such as clearing, ordering supplies, and reporting.

Similar patterns were observed elsewhere: one LA strategic lead reported operating on a skeleton crew both before and after the rollout, with staff describing high stress during cooking and serving. Another highlighted dining space limitations and insufficient lunchtime supervision as factors impacting staff wellbeing, which are issues that pre-date UPFSM and were linked to earlier school budget cuts. These examples indicate that the pressures observed during implementation stem from existing workforce and operational challenges, which have been intensified by the scale and pace of UPFSM delivery. Though workload considerations were part of the planning process and funding was provided to assess staffing requirements, some LA strategic leads highlighted that the short lead in time between the policy announcement and implementation meant that translating these assessments into practical staffing adjustments was difficult in some areas (see Chapter 4.1.5).

“It’s been mentally exhausting, because you know that you can’t leave them short staffed, especially when we’re in some of the big schools. It causes anxiety and stress”. LA strategic lead

In addition, staff felt the weight of responsibility, particularly around managing special diets (e.g., allergies, halal), which caused anxiety due to the potential health risks if mistakes were made. Even experienced managers admitted that handling special diets was more stressful than serving hundreds of standard meals. Staff in case study schools reported that the pressure they feel has intensified with the increased numbers of special diets as a result

of UPFSM. LA strategic leads and public health stakeholders interviewed also recognised the impact of the notable increase in learners requiring special diets on school catering services, with one LA strategic lead commenting that the volume of special meal plans grew so large it “became too big for (the) team to deal with”.

Another impact of the policy on staff has been the challenge of reduced capacity for supervision in some schools, particularly those catering for a larger number of learners. A few LA strategic leads reported that schools have struggled to recruit or fund additional supervisory staff, with some relying on teaching assistants to cover duties. Though chefs are not formally expected to act as lunchtime supervisors, in practice, when teachers or dedicated supervisors are unavailable, kitchen staff often find themselves covering basic safety and behaviour alongside serving. For example, in one case study school, four kitchen staff and one dinner lady were responsible for both managing meals and maintaining order, such as managing queues and helping younger learners with trays and cutlery.

While the same number of children had to be supervised before and after UPFSM, the increase in meals and the greater proportion of children receiving school dinners meant that staff had less time to attend to learners individually. Combined with the need to serve more learners within the same time window, staff reported that this leaves little opportunity for meaningful interaction with learners. Staff in one case study also noted that packed lunches now tended to include less nutritious options compared to before UPFSM, which they believed was linked to also having less time to monitor packed lunches and promote healthy eating messages to learners and families (see Chapter 5.5.3 for further discussion).

Some teachers in case study schools also observed that UPFSM has shifted responsibility for learner’s eating habits and table etiquette, with one teacher reflecting that school dinners were increasingly seen as “the school’s problem”. The debate about the responsibility for eating behaviour is discussed further in Chapter 4.1.5.1.

“Some families don’t cater for their individual child’s needs, because they have to pay for it. Whereas they choose to send them in and have the free school meal, and kind of ignore the fact they’re not eating much because they don’t have to be onerous of it”. Teacher, case study

Staff retention has been a persistent challenge for schools since UPFSM was introduced. This is largely due to increased workloads, low pay, short hours and stressful working conditions – challenges that were already present before UPFSM. Many LAs reported continued challenges in recruiting sufficient catering staff when vacancies arise, particularly for part-time roles and in rural areas.

5.2.3. Impact on food waste

The introduction of UPFSM has led to a perceived increase in food waste, according to some staff in most case study schools. This was largely attributed to more learners taking school meals but not always eating them. Staff also reported that waste is often linked to learner preferences regarding taste or presentation, and only occasionally due to poor quality. Headteachers surveyed also highlighted food waste issues when learners dislike the food or when parents/carers pre-order meals that their children do not want.

Some staff interviewed in case studies noted that some food waste comes from learners trying new foods, particularly unfamiliar fruits and vegetables. This finding suggests that through the policy, learners are trying unfamiliar fruits and vegetables and are therefore being introduced to healthier options they might not otherwise encounter.

Case study evidence shows that kitchen staff play a vital role in reducing food waste. Strategies include offering leftovers to learners or staff, providing larger portions for older learners, using their experience to order accurately, and freezing surplus food for future menu rotations. Notably, a few staff across case study schools reported no proportionate increase in food waste since the introduction of UPFSM, suggesting that in some settings, learners are consuming most of the food provided.

“There’s always been a degree of food waste and I think there always will be. Children don’t always eat everything, don’t always like what they’ve chosen”. Headteacher, case study

Some school staff in case studies reported that they are looking into ways they can work with families and the catering team to reduce waste as much as possible. One Headteacher had suggestions for how to mitigate the increase in food waste:

“All that food is going to waste and when you know the people, and you can see some families that don’t have two pennies to rub together, it feels frustrating. We’ve thought about whether, if there’s food left, it could be boxed up and families told, ‘We’ve got so many meals—come and pick one up if you want’, but there are these regulations (around food safety and storage)”. Headteacher, case study

5.2.4. Impact on administrative workloads

Almost all administrative staff in case study schools and LA strategic leads reported that one of the biggest impacts of the UPFSM policy was a reduction in administrative work associated with managing dinner money debt. Before the policy was introduced, administrative staff spent considerable time contacting parents/carers, managing payment systems and following up on unpaid balances, which often strained relationships with families. With UPFSM removing the cost element of a school meal, many staff said they now have more time to focus on their core responsibilities, improving the overall efficiency of school administration. In one case study school, staff reported that eliminating dinner money debt has also helped to “smooth” the morning routine: teachers now simply record each child’s meal choice, whereas previously they had to check whether the child has enough funds in their account or confirm eFSM eligibility.

“It’s been a relief not having to chase families for dinner money anymore. There used to be dinner debt, and every Friday afternoon I had to follow up on it. It took time. I honestly don’t know where I’d find the time to do that now”. Deputy Headteacher, case study

“The machine often didn’t work, or parents needed change to put in the machine, so this took up a chunk of my time every morning – so I have none of that now”. School secretary, case study

Beyond reducing workload, several staff in most case study schools noted UPFSM has helped to alleviate the social and emotional burden associated with discussing unpaid dinner money balances with parent/carers. Previously, these conversations were often uncomfortable and could create tension with families, putting staff in a difficult position. Removing the need for such interactions was perceived to have improved staff-parent/carer relationships and contributed to a more positive school environment.

“It does cause friction sometimes, and we don’t want friction with our families”. Teacher, case study

Some school staff in the case study schools also noted that, prior to UPFSM, the school often had to cover unpaid meal costs from their own budgets when parents/carers could not pay. In a small number of cases, this amounted to thousands of pounds annually, diverting funds from educational priorities. The issue was particularly acute in schools serving more disadvantaged communities, where families struggled to afford school dinners but did not qualify for eFSM. This situation exacerbated inequalities.

“A big job chasing it. And a difficult job, because it’s not a nice thing chasing debt, especially when it builds up significantly and the same people year on year didn’t pay it. And then that rolled over and came out of our school budget, so you know you’re losing thousands a year”. Headteacher, case study

While UPFSM has reduced the administrative burden associated with meal payments, many school staff and LA strategic leads reported a perceived unintended consequence: fewer parents/carers registering for eFSM. It is important to note that there are likely multiple factors influencing registration rates. For example, eFSM is tied to an income threshold of £7,400. Recent increases in the national living wage may have pushed some families above this threshold, meaning that changes in registration could reflect broader economic shifts rather than the introduction of UPFSM alone. This highlights that wider economic factors may have contributed to changes in the number of families who are eligible and therefore able to register, though the extent to which this might be the case is unknown.

Nevertheless, with school meals now universally available, several staff across case study schools also believed that some parents/carers may mistakenly assume they no longer need to apply for eFSM because they associate it with school meal entitlement. This misunderstanding, in their view, has contributed to a noticeable decline in applications, despite eFSM status continuing to unlock important additional benefits such as uniform grants and funding for school trips. In response, this has required LAs and schools to invest considerable time and effort into communication campaigns. LA strategic leads and staff in case study schools described persistent attempts to inform families through letters, social media posts, prompts on admission forms and cost-of-living roadshows, but these efforts have had limited success.

“It would take a full-time staff member a term to properly support families with understanding and applying for eFSM—capacity the school does not have”. Headteacher, case study

Lower eFSM registration rates may have affected planning for some schools, as eFSM numbers largely determine the allocation of the Pupil Development Grant (PDG), which

supports resources for disadvantaged learners. Some schools reported having to spend extra time encouraging parents/carers to register their eFSM status, which staff described as uncomfortable and time-consuming. While in reality the PDG budget did not decrease⁴, some schools reported a link between lower eFSM numbers and having less funding available for activities such as subsidised school trips or other support for disadvantaged learners.

“We don’t have that incentive for parents to fill the forms in anymore. Even though we say to parents look, it’s really important to us because as a school we’ll get a certain amount of money”. Headteacher, case study

These funding pressures, along with the administrative effort required for repeated communication with families, illustrate that while UPFSM has simplified meal provision, it has also introduced new complexities for schools and LAs. A few LA strategic leads and academics interviewed suggested that this issue requires policy-level solutions such as automatic enrolment to protect resources for vulnerable learners. Some staff in case study schools also recommended renaming eFSM to make it more intuitive for parents/carers that this grant covers other types of benefits in addition to free school meals (see [Beyond eligibility for free school meals \(eFSM\): data review \(summary\)](#) for a review of eFSM calculations).

Evidence from case study schools suggested that the perceived impact of falling eFSM numbers varied by school size and context. Staff in larger schools, particularly those in more deprived urban areas, tended to express greater concern about falling eFSM numbers and the potential implications for funding and resources. In contrast, it was observed that smaller schools or those serving less deprived communities faced minimal changes or even stable registration rates. Staff in smaller schools often attributed this to the smaller number of families eligible for eFSM, which made it easier for staff to identify and communicate with them. These observations reflect staff perceptions and experiences; in the absence of quantitative data, it is not possible to determine the exact reasons for changes in eFSM registration or the relative contribution of different factors, such as application behaviours, eligibility thresholds, or administrative coding.

5.2.5. Impact on the rest of the school day

There was limited evidence that UPFSM has, to date, influenced schools’ wider whole-school-food approaches. In schools with strong foundations in food education, the policy has helped to reinforce the importance of existing initiatives that promote healthy eating, such as gardening projects, cooking classes and lessons focused on nutrition. For example, a staff member in one case study school noted that “since we’ve prioritised food to begin with, (the policy) was just subsumed into our curriculum and daily life”.

Staff in other schools described missed opportunities for UPFSM to influence wider changes in school food culture due to the speed of rollout. A small number of parents/carers in case

⁴ While the overall PDG budget has remained consistent, its real value has been affected by inflation. Local authorities may use smoothing allocations to ensure schools receive a fairly consistent level of funding even when eFSM numbers change. Some earlier eFSM figures included TP learners who were incorrectly coded, so reported eFSM rates fell when these errors were corrected.

study schools also highlighted tensions between classroom messages about healthy diets and the less balanced options served at lunchtime. Overall, while UPFSM has supported schools that already prioritise food education, its integration into the wider school day and curriculum remains inconsistent.

Several public health stakeholders and school food providers emphasised the longer-term potential of UPFSM to contribute to a broader cultural shift around food in schools. They stressed that the policy's benefits would be maximised if free school meals were embedded within a whole-school approach to food – aligning the curriculum, the dining experience and the school's ethos. Suggested opportunities by interviewed academics and public health nutritionists included situating UPFSM within a whole-school approach that includes cooking and nutrition education, helping learners understand where food comes from and creating a school environment that visibly celebrates healthy eating. Such an approach was seen as central to normalising healthy choices and supporting sustained behaviour change.

5.3. What impact has the policy had on children and families' health and wellbeing?

A growing body of literature highlights the potential of UPFSM to reduce child health inequalities by increasing access to healthier school lunches. For example, a systematic review found a positive link between universal school meals and improved dietary quality, particularly when strong nutritional standards are in place, such as those requiring fruit, vegetables and whole grains ([Cohen et al., 2021](#)).

Research also suggests that these benefits are maximised in an enabling environment where meals are designed to support children's dietary health ([Au et al., 2016](#)). This impact on health and wellbeing is reinforced by evidence showing that universal free school lunches are generally healthier than packed lunches. Compared to packed meals, a study carried out in the UK found that school lunches tend to include fewer ultra-processed foods, greater diversity and quantity of fruit and vegetables, and a better balance of fibre, salt, fat and sugar ([Parnham et al., 2022](#)).

This Chapter explores the emerging evidence on whether UPFSM has improved learners and families' health and wellbeing through increasing access to school meals.

5.3.1. Impact on hunger and food insecurity

Staff and parents/carers observed that learners who previously arrived at school hungry now have enough to eat, supporting their physical health and energy levels. The impact appears strongest among learners from more deprived backgrounds, particularly those just above the eFSM threshold. Several staff members noted that the school meal is often the only hot meal some learners receive during the day. Overall, qualitative evidence indicates that the policy is achieving its intended goal and making a meaningful difference for those it aims to support.

“I'm glad there's a balance of nutrients in the meals — that the kids are getting something, especially when we think about disadvantaged backgrounds. There are some families here who really benefit”. Teaching assistant, case study

“I think it is a really good policy, but mainly because of the deprivation of children. Children don't always get food. We get children who come into breakfast club, then they have this for dinner and they might not get food until the following day when they get back (to school). School is their proper meal. So it's really important for these children that they're able to have a free school meal”. Administrative officer, case study

Survey responses from Headteachers and senior leaders showed mixed results. Overall, 55% (26 out of 47 respondents) reported no change in hunger or food insecurity since UPFSM was introduced, while 30% (14 out of 47 respondents) saw positive improvements and 15% (7 out of 47 respondents) noted challenging effects/changes⁵. Rural areas showed varied responses, with 23% (3 out of 13 respondents) seeing improvements, 46% no change (6 out of 13 respondents), and 31% (4 out of 13 respondents) reporting challenges. Headteachers in schools in urban areas were more positive overall, with 32% (10 out of 31 respondents) reporting improvements and only 10% (3 out of 31 respondents) noting challenges. These findings indicate that the policy is helping some learners, especially in urban areas, but its effectiveness is potentially inconsistent and is most likely influenced by various factors, such as learner preferences and dining room environments (see Chapter 4.1.5).

5.3.2. Food quality and nutrition

UPFSM has increased the number of learners opting for school meals, giving schools a greater opportunity to influence diets compared with packed lunches, which vary widely in nutritional quality. While the policy does not in itself guarantee an increase in healthy eating, school meals must comply with the Healthy Eating Regulations (except where reasonable adjustments are made in line with the Equality Act 2010 or for medically prescribed diets), providing a more reliable baseline. Higher uptake of school meals also means more learners are regularly exposed to more nutritious, balanced meals and encouraged to try new foods, supported by initiatives such as menu education, chef engagement and positive peer influence (see Chapter 5.1.1).

“I think, you know, the policy is enabling children to access food. Is enabling children to access healthier food”. School business manager, case study

“I think, because they're eating together and everybody's eating there and have the same thing it's like that power of when everybody else is eating it. I'm going to try it, actually it's not bad”. Parent/carer, case study

Packed lunches were perceived by several staff to be less healthy than school meals both before and after UPFSM, often containing processed foods such as sausage rolls, crisps and chocolate. Although schools can adopt policies regarding the contents of packed lunches to help align with the Healthy Eating Regulations, staff in several case study schools reported that monitoring the catering offer to ensure it promotes healthy eating has

⁵ The survey did not capture baseline data prior to implementation. As a result, “no change” could reflect either consistently low levels of hunger and food insecurity or persistently high levels, and this distinction cannot be determined from the available data. Similarly, “challenging effects/changes” may be associated with improvements in hunger or food security or no changes in hunger or food security.

become challenging. Some also noted they do not always have the capacity to check the contents of packed lunches.

Governors and Headteachers in some case study schools agreed that universal provision helps address these concerns by reducing the number of learners bringing packed lunches, which are not regulated under the Healthy Eating Regulations. Since the grant terms and conditions issued by the WG for UPFSM requires LAs to provide a meal that complies with the Healthy Eating Regulations, higher uptake of school meals increases the proportion of meals that meet the Regulations. Compliance with these Regulations is overseen by LAs and governing bodies.

In some schools, increased uptake of school meals was reported to have positively influenced the contents of packed lunches themselves. One LA strategic lead described visible improvements in eating habits, particularly among learners who previously brought packed lunches with limited nutritional value – for example, learners who now include salad or fruit in their lunchboxes after regularly choosing these items from the school salad bar on the days they choose a school meal. This illustrates that even for learners who continue to bring a packed lunch, UPFSM may indirectly encourage healthier food choices by exposing them to nutritious options at school.

Teachers in case study schools also highlighted a reduction in “picky” eating behaviours among those taking school meals, as these learners have less opportunity to avoid certain foods compared to when they bring packed lunches from home. On a similar note, observations at lunchtime and focus groups with learners revealed that they feel empowered to try new foods because both the school and their parents/carers support this approach. Kitchen staff often played an important role in encouraging these changes, as highlighted in Chapter 5.2.2.

While the policy is seen as laying the foundation for long-term healthy habits, concerns remain about food quality. Some staff in case study schools reported that they believed standards have declined since UPFSM due to operational constraints and cost-saving measures, such as increased use of ultra-processed foods and cheaper ingredients. Other staff in case study schools suggested challenges reflect wider, longer-term trends predating the policy, with one experienced chef reporting a gradual decline since COVID-19. This helps to contextualise some parent/carer perceptions that packed lunches may be a healthier alternative to school meals.

“My children would eat more healthily if I was still preparing them packed lunches”.
Parent/carer, case study

“I think a lot of the food is, well, cheap every Wednesday now, it’s chicken thighs. It’s nice meat, but that’s all we ever have, that’s the only meat we have. The children just look at the food and turn up their noses. I’ve tried every way to make it look appealing and different, but it doesn’t look good in the tray. I have to work quite hard on that”. Chef, case study

LAs should consider factors such as dietary needs, allergies, and cultural or religious requirements when planning school meal provision, while there is a separate process for medically prescribed diets where parents/carers must submit a formal request with evidence

from a GP or dietitian. Despite this, several stakeholders raised concerns that not all learners have equal opportunity to take up school meals, particularly those with special diets or religious and cultural requirements. Case study evidence shows that parents/carers often resort to packed lunches when school meals do not meet allergy, halal or cultural needs. Stakeholders felt that this lack of inclusivity limits access to meals that meet the Healthy Eating Regulations, meaning some learners miss out on the nutritional benefits intended by UPFSM, which can negatively affect their health and wellbeing compared to peers who receive balanced school meals.

Statutory guidance from Welsh Government encourages LAs and governing bodies to involve learners in decisions about food choices and menus. While discretion for menu planning rests with LAs and schools rather than at the UPFSM policy level, creating menus that reflect local needs and preferences can enhance inclusivity and ensure the offer is culturally appropriate. One academic interviewed highlighted the importance of giving learners a sense of agency and excitement by involving them in menu planning and meal routines (see Chapter 4.1.5.2).

Overall, the evidence suggests that UPFSM has had a broadly positive impact on learner's health and wellbeing by increasing access to healthier meals, shaping dietary habits and encouraging their willingness to try new foods, while also influencing the nutritional quality of packed lunches. Although concerns remain about food quality and operational pressures, the policy is widely seen as laying the foundation for long-term improvements in nutrition and wellbeing.

At this interim stage, evidence on the potential wider impact of UPFSM on family health and wellbeing remains limited. However, there are indications of potential indirect benefits linked to reduced financial strain, which may support family wellbeing by lowering stress and freeing up resources for other essentials, as discussed in Chapter 5.5.

5.4. What are the emerging educational impacts of the policy?

The evidence gathered so far on the educational impacts of UPFSM is moderate and primarily qualitative, drawn from staff observations, parent/carer and learner reports and case study visits across multiple LAs. While direct quantitative measures are limited, consistent themes from qualitative evidence emerge around socialisation, life skills, lunchtime behaviour and wellbeing, providing a reliable basis to identify likely educational benefits. Some findings are context-dependent, with variation across schools and age groups.

Several studies have found that participation in school meal programmes is linked to improvements in behaviour, concentration and socialisation. For example, one notable study showed that primary school mealtimes offer valuable opportunities for children to build relationships and develop social skills, which can enhance enjoyment of school and support emotional wellbeing ([Baines and MacIntyre, 2019](#)). Similarly, a study conducted in Norway found that introducing free school meals led to a calmer, more inclusive learning environment, with teachers observing stronger social relationships and reduced inequalities among learners ([Heim et al., 2019](#)). An evidence review considered policy interventions

from several countries, particularly the English universal infant free school meal offer, Sweden's free school meals programme, and programmes within the United States, demonstrating that there are benefits to learner health outcomes and, in some cases, to attainment and later life benefits ([Evidence review – the effects of Universal Free School Meals](#)). These findings underscore the importance of social and behavioural outcomes as potential effects of UPFSM, in addition to its impact on learning and attainment.

5.4.1. Impact on learner's social skills and development

In many case study schools, UPFSM appears to have strengthened social and developmental benefits by turning lunchtime into a shared, structured experience where learners develop table manners, cutlery skills and social interaction. Evidence from staff, parents/carers and observations of the lunchtime service shows that universal provision has reduced feelings of exclusion and created a positive, community-like environment that supports both socialisation and life skills.

Staff in several case study schools reported emerging changes in learners' social interactions following the introduction of UPFSM (see Chapter 5.1.2). Observations of the lunchtime service in case studies and focus groups with learners indicated that many learners chose school lunches because their friends did, suggesting that the flexibility provided by UPFSM has enabled a more social and inclusive lunchtime experience. Some learners highlighted that having a school meal helped them avoid feeling "left out" compared to peers with packed lunches.

Staff in a few case study schools also noted that shared mealtimes have supported the development of practical life skills, such as table etiquette and the correct use of cutlery, through learners observing and imitating behaviours. These experiences were seen to enhance enjoyment around food, with a parent governor in one case study school emphasising that "there's a lot of life skills involved in a mealtime". Many school staff agreed that lunchtime has become a more positive part of the school day, with one Headteacher stating:

"A lot of our children were coming in not knowing how to use a knife and fork, not necessarily even eating their food with a spoon so we have been able to teach table manners, what to do when everybody has finished, promoting these sort of social skills".
Headteacher, case study

5.4.2. Impact on behaviour and concentration

Interviewed staff in case study schools felt that UPFSM has had a modest but positive impact on learner behaviour and concentration, primarily through reducing hunger and creating calmer lunchtimes. While most staff reported no major changes, several noted that learners now return to lessons more settled and less hungry, with some improvement in energy and attention during afternoon sessions. These impacts are not universal and may be influenced by other factors, but they were consistently highlighted as beneficial.

Headteachers and governors in some case study schools observed that behaviour during mealtimes has improved, with calmer dining environments encouraging more learners to eat

their food. One Headteacher from a case study school commented that “if they haven’t had a good meal, they’re not going to thrive in the same way, and children are undoubtedly eating better”. A few teachers involved in the case studies noted a noticeable difference in learners’ engagement after lunch compared with before the policy. Previously, some learners were still hungry in the afternoon, and teachers often had to pause lessons for an extra break so learners could eat. Now, “children are full, eaten well, and ready for their afternoon to go again”.

A few parents/carers in one case study school echoed these views, with one in particular noting that their child, who previously ate a packed lunch, often came home hungry which affected their concentration at school. Since UPFSM, the parent/carer reported their child “seems to be doing better as they have eaten a meal”, enabling them to be more focused and better able to participate in lessons. Overall, staff and parents/carers agreed that access to a nutritious meal during the school day supports learning and wellbeing, even if the scale of impact varies across settings.

5.4.3. Impact on attendance

There is no clear evidence that UPFSM has directly improved school attendance. One staff member in one case study school suggested that some parents/carers may now give priority to sending their children to school not only for educational purposes but also to ensure they receive a guaranteed meal, framing school as a broader source of care. However, this finding was anecdotal and not widespread.

National data from the Welsh Government for 2023/24 shows that 53.3% of primary eFSM learners were persistently absent (missing more than 10% of sessions), compared with 24.4% of learners not eligible ([Attendance and absence from schools](#)). While these figures have improved since peaking in 2022 to 2023⁶ and the gap between eFSM and non-eFSM learners has narrowed, the difference remains substantial. Given the range of factors influencing attendance, it is difficult to attribute any change directly to UPFSM.

Potential attendance and attainment impacts will be explored further in the next phase of this study.

5.5. What impact has the policy had on family finances?

UPFSM is also seen as a universal leveller policy to reduce socio-economic inequalities ([Institute for Fiscal Studies, 2023](#)). Direct financial savings from not paying for lunch have been shown to decrease financial stress for families and increase available household resources. Evidence from the evaluation of the implementation of UPFSM in London also suggests that savings from UPFSM encourages and allows families to increase the quality or the quantity of food purchased in the home, contributing to higher standards of living ([Impact on Urban Health, 2024](#)).

⁶ Although 2022 to 2023 was when UPFSM was rolled out, attendance data for that year is referenced here because it was the first year in which data was collected following the COVID-19 pandemic. The previous data collection took place in 2018 to 2019, which is not comparable as it reflects pre-COVID attendance patterns.

The current evidence on UPFSM's impact on family finances is not yet definitive, though it points to meaningful shifts in household budgeting and food security. Early insights suggest the policy may ease financial strain for families, particularly those on low incomes or just above the eligibility threshold for eFSM. The next research phase will include a parent/carer survey to test and validate these emerging findings, providing more robust data on financial benefits.

5.5.1. Impact on family finances

Reports from staff and parents/carers across most school case studies indicated that the UPFSM policy has eased financial pressure on families, particularly those with multiple children (see Chapter 5.2.4). Parents/carers no longer need to budget for several paid meals or rely on cheaper alternatives for packed lunches. By providing a hot, nutritious meal for every learner, the policy has created a more level playing field, ensuring equal access to food options regardless of family income.

Stakeholders consistently highlighted the cost of healthy food as a main challenge for families. Many staff in the case studies reported that parents/carers struggle to provide nutritious options at home, with one teacher noting the difficulty of “being able to budget to make sure the children have that nutritional meal”. Across case studies, staff agreed that affordability is an issue for many parents/carers, especially for those on the cusp of eligibility for eFSM, and that UPFSM has helped to reduce weekly expenses. While UPFSM cannot eliminate poverty on its own, it was believed to make life more manageable for families under financial strain and addresses inequities in the previous system, where some learners arrived at school with minimal packed lunches.

“It makes a huge difference knowing they’ve got a hot dinner”. Lunchtime supervisor, case study

“I think financially, it's had a huge positive impact on our parents that they, they're reassured that their child's going to eat that day. And it sounds pretty extreme but what we deal with is that children might not eat if they don't have a school meal. Or even if they do eat the meal at school is their biggest meal of the day, and so they rely on that. And then maybe they wouldn't if they had to pay for it”. Family liaison officer, case study

5.5.2. Impacts on stigma

UPFSM has reportedly reduced stigma and social inequality associated with free school meals among learners by ensuring they all receive the same provision, creating a more inclusive and equitable environment. Staff, parents/carers and learners indicated that this has improved learners' wellbeing, removed visible divides and normalised school meals, though some staff in case study schools note pre-existing cashless systems had already mitigated stigma to an extent.

“Now, you don't know whether your mam is on £50,000 a year or 50p. It's equal and accessible for anyone, which is what it should be”. Teaching assistant, case study

It was also generally believed that UPFSM has eased financial strain for families just above the eFSM threshold, ensuring learners receive a guaranteed nutritious meal and reducing parental stress. Staff and parents/carers reported that universal provision not only alleviates economic pressure but also removes stigma for low-income households, fostering greater equality and emotional relief. There was strong evidence from case studies and interviews with LA strategic leads of the positive impacts of the policy on parents/carers following the removal of dinner money debt, which has also helped reduce stigma and stress for parents/carers. This change was reported to further alleviate pressure on family finances by ensuring that every child has access to a school meal.

“You know, the children aren’t going to get penalised now because they’re guaranteed a meal”. School business manager, case study

5.5.3. Impacts on family life

In addition to easing financial pressures and removing stigma, UPFSM has delivered practical and emotional benefits for families. By removing the need to prepare packed lunches, parents/carers reported that the policy saves them time and reduces daily stress. One parent/carer described the change as “one less thing to pay, one less thing to sort”, highlighting the convenience and relief it brings, particularly for households with multiple children or parents/carers working long or irregular hours.

Parents/carers consulted during case studies explained that guaranteed access to a hot, nutritious meal each day provided them with peace of mind, alleviating concerns about whether their child will eat well. This reassurance was described as a “huge pressure lifted” by staff and parents/carers alike. For many interviewed parents/carers as part of the case studies, the policy has improved emotional wellbeing by reducing the guilt associated with limited time or resources to prepare healthy meals at home.

Parents/carers also reported that UPFSM helps with meal planning. Knowing their child has had a substantial meal during the day allows flexibility for evening meals without compromising nutrition. In one school, some families noted that school menus have inspired new ideas for home cooking, with catering teams offering recipes on request.

Overall, there is evidence that the secondary benefits including time-saving, convenience and emotional relief complement the financial impact of UPFSM, making life more manageable for families and supporting a more equitable school experience.

5.6. What impact did the policy have on the Welsh school food system, distributors, suppliers and producers?

5.6.1. Early positive impacts

There is some early indication that local procurement may generate benefits for the Welsh school food system and local economy, although evidence at this stage is limited and should be interpreted cautiously. One school provider suggested that the LA’s purchase of local milk and produce supports the local economy whilst reducing food miles. They highlighted that further research into the benefits of local procurement could help clarify the

benefits to the local economy and sustainability, beyond simply choosing the cheapest option. The provider also noted that their operating model could serve as a case study across Wales. They offer education visits to the farm being free of charge to schools in the LA so learners can have greater awareness of the produce they consume, whilst being a cheaper, educational school-trip.

5.6.2. Lack of awareness

Despite potential benefits of local procurement and sourcing, as set out in Chapter 4.2, awareness of food sourcing and procurement practices remains limited across schools, and the extent to which this is linked to the policy is unclear. One chef interviewed as part of a school case study revealed that kitchen staff often lacked knowledge of whether food was Welsh or locally sourced. For example, while meat had previously been sourced locally, some schools reported that this was no longer the case. Parents/carers in one case study explained that this lack of awareness extends to learners: older learners may calculate ‘food miles’ in lessons, but have little understanding of the origins of the food they consume at lunchtime.

Many schools and kitchen staff are not directly involved in procurement decisions, which are generally managed by LAs. In one case study school, kitchen staff reported that they felt their feedback on menus was not meaningfully considered. In this instance, school staff were not confident in their knowledge of the school meal provision, as discussed above. Moreover, the kitchen was viewed as a “separate entity” within the school environment as it was directly instructed and managed by the LA.

6. Conclusions, lessons learned and recommendations

6.1. Conclusions

This Chapter summarises the findings from the research conducted to date, focusing on the implementation process and early signs of impact from the UPFSM policy.

Most stakeholders (LAs, Headteachers, kitchen staff, teachers, school staff, parents/carers) expressed support for the UPFSM policy, especially for its potential to reduce stigma and support low-income families who might otherwise face financial barriers to accessing school meals. While stakeholders broadly supported universal access to school meals, a small number of Headteachers and parents/carers questioned whether a universal approach was always the most equitable, suggesting that more targeted support could be appropriate in certain contexts.

The phased rollout of the policy, combined with targeted capital and revenue funding, was generally viewed positively in enabling schools and LAs to manage infrastructure upgrades, logistical adjustments and staffing pressures that came with implementing the policy. While experiences varied depending on local capacity, school size and timing of implementation, most schools were able to prepare effectively, supported by practical guidance from LAs. However, challenges were observed where upgrades were complex, supply chains delayed or recruitment of additional catering and supervisory staff proved difficult, highlighting ongoing operational pressures.

Communication from the Welsh Government was also sometimes perceived as delayed or unclear, particularly immediately following the policy announcement, which placed additional responsibility on LAs to interpret guidance and support schools.

By July 2024, average uptake of UPFSM was 69% (ranging from 57% to 82% across LAs), with higher uptake among younger learners who experienced the offer throughout their school life. The universal, free nature of the policy has been the strongest enabler, particularly for families just above the eligibility threshold for eFSM. In efforts to increase uptake, several LAs and schools have implemented both practical strategies to encourage enjoyment of school meals (such as increasing variety on menus) alongside targeted efforts to strengthen learner and parent confidence and engagement in the school meal offer. However, challenges remain, particularly in boosting uptake among older learners and meeting dietary and cultural requirements.

At this interim stage, a range of emerging impacts of UPFSM have been reported; these are summarised below.

Positively, UPFSM has improved access to nutritious meals for all learners, supporting healthy eating habits and reducing food insecurity, especially for families just above the eFSM eligibility threshold. The removal of meal costs has also eased administrative burdens related to dinner money debt, improved relationships between schools and families and allowed staff to focus more on teaching and other responsibilities. In some schools, the policy has fostered social benefits, with shared mealtimes encouraging peer interaction, modelling of healthy eating, and a more inclusive dining experience. There has also been

some limited evidence of improved behaviour and concentration, and the policy has eased financial pressure on families, particularly those with multiple children or just above the eligibility threshold.

Several unintended consequences have also emerged. Increased meal uptake has placed pressure on lunchtime logistics, especially in larger schools. Some schools reported more rushed or chaotic lunchtimes since the introduction of the policy, and higher workload and stress for catering teams, particularly around managing special diets and higher meal volumes. Food waste has increased in some settings, particularly when learners try unfamiliar foods, and there are ongoing challenges around maintaining supervision and promoting healthy eating during busier lunchtimes. In addition, a new challenge has emerged with fewer parents/carers registering for eFSM, with implications for funding allocated to learners from more deprived backgrounds and associated school resources.

6.2. Lessons learned and recommendations

This Chapter presents the main lessons learned and recommendations from the evaluation. Each lesson is associated with recommendations aimed at either the Welsh Government, the WLGA, LAs, catering teams or schools.

6.2.1. Continuous support to LAs and schools to promote uptake of UPFSM

Although the UPFSM rollout has been completed successfully, LAs, schools and parents/carers continue to face ongoing challenges. Uptake remains lower in some schools and LAs, and some report difficulties in meeting increased dietary requirements or adapting to operational pressures. Evidence suggests that timely guidance and clear communication remain important to help schools and LAs manage these challenges effectively, particularly as further changes to the Healthy Eating Regulations are introduced (planned for October 2026).

Recommendations for the Welsh Government:

- continue to provide a single point of contact within the Welsh Government for ongoing queries or challenges from LAs related to UPFSM uptake, including queries around the Healthy Eating Regulations update

Recommendations for LAs:

- maintain ongoing support and guidance to assist schools with new and emerging challenges and to encourage universal uptake of school meals, especially when changes to Healthy Eating Regulations are brought in
- use networks, forums or other collaborative channels to share practical solutions, case studies and lessons learned for increasing uptake, enabling schools to adopt best practices
- provide information in multiple languages and ensure language is accessible

6.2.2. Strategies to improve uptake

Schools reported using a variety of strategies to encourage uptake, such as menu adaptations, staff encouragement and parent/carer engagement. However, uptake remains inconsistent across schools and LAs. Schools play a critical role as the main link between catering services and families; where engagement between schools and caterers is limited, opportunities to promote the value of school meals and encourage uptake may be missed. Some barriers mentioned included menu appeal, cultural/dietary needs and lower uptake among older learners.

Recommendation for LAs:

- establish a network for schools to share best practices and explore different approaches to increase uptake would allow schools to learn from each other and adopt effective strategies

Recommendation for the WLGA:

- help LAs work with schools to increase school meal uptake and identify common challenges and successful approaches across LAs, particularly where uptake is low

Recommendation for schools:

- proactively share successful strategies with peers through local forums or collaborative groups to foster mutual learning

6.2.3. Data

There was reported to be a lack of consistent, detailed data on school and learner-level uptake. This limits the ability to analyse trends and understand correlations (e.g., between attendance and meal uptake). While the Welsh Government provides guidance on data collection, further support to standardise data collection across LAs and schools is recommended. Particularly with regards to uptake, more comprehensive and consistent data will help analyse trends and focus areas where further support may be needed.

Recommendation for the Welsh Government:

- continue providing guidance to LAs on how to collect high-quality, standardised data and how to use it to monitor uptake trends, identify patterns, and assess what works

Recommendations for LAs:

- use school-level data to monitor uptake and understand uptake patterns across learners and use this to inform menu adaptations and support decision-making and targeted interventions
- share insights on effective strategies to improve uptake

6.2.4. eFSM

The introduction of UPFSM carries a potential risk that some families may not register for eFSM, since children receive a free meal regardless of eligibility. While it is not clear how great the size of this effect has been in practice, any under-registration could affect access to additional benefits and the accuracy of eFSM data. Recommendations therefore focus on mitigating this risk by supporting registration and ensuring eligible children can access all the benefits to which they are entitled.

Recommendations for the Welsh Government:

- explore legislative changes to remove barriers to applying to eFSM such as introducing automatic enrolment or a simplified processes to protect funding for learners from more deprived backgrounds
- consider renaming eFSM to make sure its wider benefits (e.g., uniform grants, trip subsidies) are clear to potential recipients

Recommendation for LAs and schools:

- implement targeted communication strategies to raise awareness of eFSM eligibility and benefits, ensuring that all eligible families are informed and supported to submit applications; this could build on existing Welsh Government guidance or communications

6.2.5. Local produce

Strong support exists for sourcing Welsh/local produce however several barriers limit its presence in primary schools. Barriers noted included supply chain limitations a lack of processing infrastructure and concerns around rising food inflation. Recommendations here focus on reducing/removing these barriers and facilitating continued local procurement in primary schools where best practices exist.

Recommendations for the Welsh Government:

- explore developing and promoting a definition of what constitutes 'local' produce in relation to school food procurement
- consider what targeted support or guidance could help schools maintain local procurement, particularly in the context of rising food costs including financial assistance or subsidies, practical tools or sharing best practice approaches
- continue to support piloting of different projects that can help to identify ways to increase local supply, such as the Welsh Veg in Schools initiative
- develop or build on existing strategies to give long-term priority to local procurement, ensuring consistency across schools and LAs and supporting sustainable sourcing practice

- strengthen communication and coordination across LAs, including sharing guidance, best practice, and approaches to local sourcing, to ensure consistent implementation, reduce confusion, and help overcome logistical or procurement barriers

6.2.6. Secondary level provisions

Concerns were raised about the long-term impact of the policy in the absence of provision at secondary level. It was noted that learners may feel the impacts of being eFSM (or not eligible) for the first time during the transition to secondary school, with potential increases in stigma and negative consequences for their health and educational attainment. It is therefore recommended to explore what may be feasible in terms of reducing such impacts when learners transition to secondary level.

Recommendations for the Welsh Government:

- explore options for extending the eFSM provision at secondary level
- explore the feasibility of introducing a universal offer into secondary schools

6.2.7. Lunchtime experience

One factor identified as potentially discouraging uptake relates to the lunchtime experience. Limited dining hall space and long queues were seen as negatively affecting the overall experience, which may in turn reduce learners' willingness to take a school meal. It is therefore recommended that, where possible, efforts are made to create a more relaxed and enjoyable lunchtime environment.

Recommendations for LAs and schools:

- give priority to practical measures, such as improving dining room layouts to improve flow, adjusting or staggering lunch times to reduce queues and introducing structured seating arrangements to promote social interaction and a sense of community
- create a more relaxed and enjoyable environment to encourage greater uptake of UPFSM

Annexes

Annex 1: Datasets

Table 1: UPFSM revenue funding allocated per LA (GBP)

LA	2022-23	2023-24	2024-25	2025-26
Blaenau Gwent	671,684	1,483,133	1,897,615	1,950,949
Bridgend	955,337	1,966,816	4,344,989	4,715,771
Caerphilly	1,848,650	4,391,074	5,373,910	5,249,642
Carmarthenshire	1,359,879	8,390,675	10,652,352	10,547,818
Ceredigion	1,223,742	3,705,327	5,945,114	5,915,247
City of Cardiff	724,515	1,713,809	1,985,083	1,969,616
Conwy	959,983	2,345,432	2,928,023	2,903,490
Denbighshire	435,750	1,755,652	2,883,223	2,856,023
Flintshire	797,428	2,852,971	4,679,504	4,557,903
Gwynedd	961,971	3,108,269	3,450,161	3,403,227
Isle of Anglesey	648,883	1,679,894	2,074,683	1,993,616
Merthyr Tydfil	557,669	1,048,593	2,092,283	2,071,483
Monmouthshire	918,743	2,161,436	2,700,288	2,668,821
Neath Port Talbot	1,023,038	2,760,033	3,662,963	3,624,562
Newport	1,751,104	4,252,519	5,329,643	5,412,843
Pembrokeshire	1,362,407	3,067,883	3,848,031	3,759,497
Powys	816,567	2,132,915	3,851,231	3,805,897
Rhondda Cynon Taf	2,028,028	4,842,492	7,681,128	7,609,661
Swansea	788,917	2,445,206	5,938,995	6,724,854
Torfaen	1,610,723	4,768,436	4,772,305	4,702,438
Vale of Glamorgan	878,929	2,119,788	2,626,688	2,636,288
Wrexham	865,336	3,295,431	4,037,366	3,978,698
WALES Total	23,189,284	66,287,785	92,755,577	93,058,344

Note: The figures for revenue funding for 2022 to 2023 include Nursery allocations.

Table 2: UPFSM capital funding per LA (GBP)

LA	2021-22	2022-23	2023-24	2024-25	2025-26
Blaenau Gwent	477,124	667,974	0	0	0
Bridgend	1,162,705	1,627,787	0	688,143	346,933
Caerphilly	1,483,742	2,077,239	0	286,984	0
Carmarthenshire	1,570,320	2,198,448	-55,155	0	0
Ceredigion	570,214	798,300	0	0	0
City of Cardiff	2,730,253	3,822,354	1,427,856	2,165,340	0
Conwy	889,111	1,244,756	-66,630	66,630	0
Denbighshire	859,456	1,203,238	8,762	95,990	540
Flintshire	1,262,167	1,767,034	0	0	0
Gwynedd	1,121,603	1,570,244	60,000	80,000	0
Isle of Anglesey	594,412	832,177	0	0	0
Merthyr Tydfil	475,828	666,159	0	176,890	0
Monmouthshire	609,318	853,045	0	0	0
Neath Port Talbot	1,110,632	1,554,885	-1,000,053	2,058,306	453,173
Newport	1,277,744	1,788,842	0	0	0
Pembrokeshire	950,398	1,330,558	-615,107	1,464,855	0
Powys	1,099,255	1,538,958	0	0	0
Rhondda Cynon Taf	2,026,096	2,836,535	2,470,000	1,875,000	479,399
Swansea	1,804,997	2,526,996	-1,940,073	341,114	573,428
Torfaen	715,174	1,001,244	178,450	0	0
Vale of Glamorgan	1,137,937	1,593,112	0	35,780	200,290
Wrexham	1,071,512	1,500,117	0	0	0
WALES Total	24,999,998	35,000,002	468,050	9,335,032	2,053,763

Note: During the 2023 to 2024 financial year, certain reversals occurred where Local Authorities had incorrectly drawn down funding. These amounts were subsequently recovered and reallocated as appropriate.

Table 3: LA name and date of full rollout

LA name	Month and year of full rollout
Anglesey	September 2023
Blaenau Gwent	September 2023
Bridgend	September 2024
Caerphilly	September 2023
Cardiff	June 2024
Carmarthenshire	April 2024
Ceredigion	September 2023
Conwy	September 2023
Denbighshire	January 2024
Flintshire	April 2024
Gwynedd	September 2023
Merthyr Tydfil	February 2024
Monmouthshire	September 2023
Neath Port Talbot	September 2023
Newport	September 2023
Pembrokeshire	September 2023
Powys	April 2024
Rhondda Cynon Taf	April 2024
Swansea	September 2024
Torfaen	September 2023
Vale of Glamorgan	April 2023
Wrexham	September 2023

Annex 2: Detailed Evaluation Framework

High Level Implementation Evaluation Question 1: How effectively has the UPFSM policy been implemented?

- How did the Welsh Government prepare for the roll out of UPFSM? How effective and appropriate were these activities in supporting implementation?
- How have different types of schools, LAs and catering providers prepared, planned and acted to support the introduction and early rollout of UPFSM?
- Who monitors the programme/policy's effectiveness using what data?
- What lessons have been learned? How have barriers to implementation been overcome?

High Level Implementation Evaluation Question 2: How has the implementation of the UPFSM supported the policy aims and objectives?

- How has the UPFSM policy supported the provision of nutritious meals to primary school children in Wales?
- What has been the role of school governing boards in supporting and encouraging effective implementation and uptake of UPFSM?
- How have schools, LAs and catering providers approached and experienced staffing and recruitment for UPFSM scale up?
- How has the UPFSM policy affected the workload of different school staff (e.g., teaching staff, lunch staff, support staff)?
- How has implementation of UPFSM affected the reported quality of eFSM indicator data?

High Level Process Question 3: How have LAs/the catering provider implemented changes to food sourcing and procurement practices following the roll-out of UPFSM?

- What barriers or facilitators to increasing local food procurement have been experienced by LAs since UPFSM?
- How have school menus changed to reflect a focus on local/Welsh produce since UPFSM?
- Has demand for local/Welsh food in the school supply chain increased since UPFSM?

High Level Impact Evaluation Question 4: What factors affect uptake of UPFSM?

- What impact did the phased implementation of the policy have on uptake of school meals in general and among specific learner groups?

- What are the barriers and enablers to uptake, especially among the most disadvantaged children and families?
- How are families and learners experiencing UPFSM?
- Are learners eating better quality and/or more nutritional food as a result of UPFSM?
- What are some good practices and lessons learned in how to increase uptake?
- How have feelings of stigma associated with take up of free school meals been affected by the universal offer?

High level Impact question 5: What are the emerging impacts of the policy on school life?

- What impact has the policy had on opportunities for healthy play (physical activity, games and healthy socialising play with friends etc)?
- What wider impacts have there been on school life (including extra-curricular activities) since UPFSM was rolled out?
- How has the policy affected the school timetables and the organisation of lunchtime?
- What unintended impacts/outcomes on school life have been experienced?

High Level Impact Question 6: What impact has the policy had on children and families' health and well-being?

- How has the policy affected food insecurity and learners' eating habits (at school)?
- How has the policy affected household eating practices?
- How has the policy affected children's nutritional status (dietary diversity, meal frequency, weight and growth, dental health, type 2 diabetes/pre-diabetes etc)?
- Is there evidence that inequalities in physical and mental health among primary school age children are reducing?

High Level Impact Question 7: What are the emerging educational impacts of the policy?

- How has the policy affected learners' social skills including both during and outside mealtimes?
- How has the policy affected learners' behaviour including both during and outside mealtimes?
- How has the policy affected learners' attendance?
- How has the policy affected learners' attainment?
- Is there evidence that inequalities in educational outcomes and determinants are reducing?

High Level Impact Question 8: What impact has the policy had on family finances?

- Have families experienced cost savings as a result of the policy through not preparing lunches, and if so, how much/with what magnitude?
- How has time saved from preparing lunches impacted families?
- Is there evidence that socio-economic inequalities are reducing?

High Level Impact Question 9: What impact did the policy have on the Welsh school food system, distributors, suppliers and producers?

- How has the roll-out of UPFSM impacted on suppliers at all tiers? (from growers to wholesalers)
- Has the inclusion of more local food since UPFSM had cost implications?

High Level VfM Question 10 (Economy): How have the resources available to WG, LAs, Catering Providers and Schools been used and have resources been used well to provide the right quality at min cost?

- What resources have been available to the Welsh school food system to implement UPFSM? What are the programme costs? How has the funding been allocated across capital and revenue costs? Have resources been seen as sufficient?
- How have LAs used the resources available? How have the WG and other delivery (LA) partners ensured that resources were used effectively?
- How have schools used the resources available to them, if any?
- Were the capital revenue grants used to purchase good quality equipment at reasonable cost?
- Have the cost per meal payments enabled the purchase of inputs required to deliver good quality meals?
- Did the pace of roll out affect the economy of the use of resources?

High Level VfM Question 11 (Efficiency): Are the outputs delivered (numbers and quality of meals) good compared to the resources used to implement UPFSM?

- What outputs have been achieved from the inputs purchased, and how have these contributed to the aims of the policy?
- Has the programme succeeded in delivering high quality nutritious meals for all children at reasonable cost (within the allocations provided)?
- Has the programme incurred additional costs which have not been reimbursed by the Welsh government?

High Level VfM Question 12: What benefits has the policy delivered, and how do these compare with their costs?

- What is the true cost of the policy?
- What outcomes been affected, and to what extent can these be attributed to the policy?
- Can any of the outcomes that the policy is delivering be valued in monetary terms?

High Level VfM Question 13: Have the benefits of the policy been distributed fairly?

- Who has benefited from the policy?
- Has the policy benefited children and families from the most disadvantaged groups and areas?

Annex 3: Methodological annex

Annex 3.1: Qualitative interview methods

The sampling frame for the qualitative interviews comprised three distinct stakeholder groups: LA representatives, school food providers and wider stakeholders. This structure was designed to ensure a comprehensive understanding of the implementation and impact of the UPFSM policy across different levels of involvement.

The Welsh Government provided most of the contacts details and identified the relevant stakeholders to speak with across the three stakeholder groups involved in the interviews. Where contact details were not directly provided, names were suggested and searches on company websites for relevant details were conducted.

Representatives from all LAs across Wales were interviewed. Three interviewees in total declined the invite to an interview, two school food providers and one wider stakeholder. Reasons cited were limited understanding of the policy and familiarity with UK-wide operations (rather than factors specific to the Welsh context). Three school food provider and wider stakeholder organisations proved difficult to reach as it was challenging to identify a suitable contact with relevant operational knowledge. In these situations, Welsh Government were asked to identify different people within an organisation, and for members of their team to make introductions where relationships already existed.

The target number of interviewees was 22 for LA representatives, eight for school food providers and nine for wider stakeholders.

Three topic guides were developed for the interviews, one per stakeholder group to ensure that the questions were relevant to the interviewees experience. Each topic guide provided a brief explanation of the evaluation and the purpose of the interview for the interviewer to run through at the start of the interview as well as questions and prompts. All topic guides were approved by Welsh Government in advance.

Specific topics varied by stakeholder category. Topics discussed with LA strategic leads included the approach to scaling provision, barriers and enablers to implementation, guidance and support provided to schools, funding distribution, communication strategies and the perceptions of the policy's benefits and shortcomings. In interviews with school food providers, topics included mechanisms for working with schools, changes to procurement and delivery models, supply chain impacts, safety and quality of meal preparation, uptake levels and future challenges and opportunities. Interviews with wider stakeholders covered broader perspectives on the initial rollout of UPFSM, policy formulation, anticipated long-term impacts on food insecurity, education and well-being, as well as views on equalities impacts.

While the LA strategic leads topic guide were more prescriptive and all questions were asked to all stakeholders involved, the school food providers and wider stakeholder interviewees took more of a semi-structured approach to enable adaption to interviewee expertise.

Annex 3.2: School survey methods

The school survey aimed to gather the views of senior leaders within schools on the UPFSM policy. Senior leaders included head or deputy head teachers, school business manager or relevant members of staff with knowledge or oversight of school meals.

The survey was launched on 4 July and closed on 28 July 2025.

Two email reminders were sent to the same LA representatives, encouraging them to prompt Headteachers to complete the survey. Additionally, schools that had started but not yet completed the survey were followed up with directly to encourage completion.

A total of 47 headteachers or senior members of staff responded to the school survey, approximately 4% of all schools in Wales.

Following data collection, the survey data was cleaned manually using Excel. In-depth descriptive statistical analyses were conducted, including demographic and socio-economic characteristics.

Sampling frame

All 1,199 primary schools, including special schools with primary aged learners, in Wales were invited to take part in the school survey. Schools were invited to take part in the survey via post. All schools with primary aged learners were sent a physical letter which contained an invitation to participate as well as a privacy notice. The letter contained a tiny URL link to the survey and a QA code for ease of access. All communication materials regarding to the survey were shared in Welsh and English.

The decision to send out physical letters rather than relying on emails was because Headteachers often receive a large volume of digital communication. It was hoped that a printed letter would therefore stand out more, thereby increasing the likelihood that schools would respond to the survey. This method was similarly used during the evaluation of [UPFSM in London](#).

Two email reminders were sent to LA representatives, encouraging them to prompt Headteachers to complete the survey.

Quality issues

Addresses for all schools in Wales is public information, available via the [Welsh Government website](#). Email addresses are usually publicly available, however are not held on one central database. Where email addresses had been collected for the school case studies, school were also invited to participate via email (except from the schools which were included in the case study research activity).

Four postal invites were undelivered and returned to ICF offices. To ensure these schools had the opportunity to complete the survey, they were invited via email to complete the survey, these emails were acquired via the school's website. The reason behind the

undelivered postal invites was that schools had moved location, but the central database had not been updated.

Some recipients encountered difficulties accessing the tiny URL links included in the original letters. To resolve this, revised letters with the full survey links were emailed to LA representatives who had been interviewed for the study, as well as to Headteachers selected for case studies (identified via school or LA websites).

Development of the research tools

The survey was administered via Forsta, ICF's trusted survey platform. The Forsta platform provides customisable, high-quality and reliable surveys. Data from Forsta are easily extracted into a Microsoft Excel spreadsheet for the presentation of crosstabs and enabling other data analysis techniques.

Survey questions were developed with a strong emphasis on the take up of UPFSM, as opposed to solely its implementation, guided by the theory of change. The survey was largely made up of quantitative questions, with a few optional open text boxes where appropriate. The research tool enabled survey questions to be presented under specific subthemes:

- Experience of UPFSM
- Increasing uptake
- Funding
- Changes to school meals, procurement and service since UPFSM
- Data and monitoring
- eFSM registration and perceptions
- Whole school food policies
- Dining room staffing and environment
- Impacts

Piloting

Prior to the survey launch, three headteachers from three LAs were invited to pilot test the survey. These were identified through LA representatives putting forward school names who would be willing to take part in the pilot. Two responded and provided comments which were addressed before the official launch.

Response rate

There were 47 complete responses of the survey across 18 LAs. 47 equates to almost 4% of the total respondents. Incomplete responses were not incorporated into analysis to ensure that all participants were consenting to submitting their final answers.

In an attempt to boost the response rate, schools that had incomplete responses were followed up via email, as well as sending an additional reminder to LA representatives where there were no responses (Merthyr Tydfil, Powys, The Vale of Glamorgan, Torfaen).

Representation of respondents

The survey aimed to have a wide range of representation. Representation was focused on an appropriate selection of LAs, size of schools and percentage of school learners eligible for eFSM.⁷ The comparison of these characteristics across Welsh Primary Schools to Survey Respondents is detailed below.

Table 4: Survey respondents per LA

LA	Percentage of schools in Wales in the LA (%)	Percentage of school respondents in the survey (%)
Blaenau Gwent	2	2
Bridgend	4	7
Caerphilly	6	5
Cardiff	8	11
Carmarthenshire	8	2
Ceredigion	3	2
Conwy	4	5
Denbighshire	4	7
Flintshire	5	11
Gwynedd	7	7
Isle of Anglesey	3	2
Merthyr Tydfil	2	0
Monmouthshire	3	5
Neath Port Talbot	4	5
Newport	4	2
Pembrokeshire	4	2
Powys	6	0
Rhondda Cynon Taf	7	9
Swansea	6	5
The Vale of Glamorgan	4	0
Torfaen	2	0
Wrexham	5	11

⁷ School codes were used in the survey to connect schools to their wider characteristic data. This was not included in the pilot survey so tables are based on 45 respondents to whom we can identify their characteristics.

Table 5: Survey respondents per size of school

Size of School	Percentage of schools in Wales (%)	Percentage of school respondents in the survey (%)
0-50	8	4 (n=2)
51-150	31	33 (n=16)
151-300	38	38 (n=18)
301-500	21	20 (n=9)
500+	2	4 (n=2)

Table 6: Survey respondents per percentage of eFSM learners in a school

School learners eFSM (%)	Percentage of schools in Wales (%)	Percentage of school respondents in the survey (%)
0-25	74	76
26-50	23	22
51-75	3	2

Annex 3.3: School case study methods

This Annex presents the methods undertaken to conduct qualitative case studies of 14 schools in Wales.

Approach

The evaluation team developed detailed case studies of 14 schools in Wales. The case studies consisted of in-depth fieldwork with school and catering staff, parents/carers and learners over two days in June and July 2025.

The case studies aimed to explore how UPFSM has been implemented and experienced within different school settings and consider emerging benefits and impacts. Doing so would build an in-depth understanding of the factors that have influenced rollout of UPFSM across different types of schools, communities and catering models, and their unique circumstances, challenges and successes. It would also consider emerging benefits and impacts of UPFSM.

Sampling frame

The evaluation team selected school case studies in two stages. First, by selecting a set of LA areas that reflected a range and diversity of geographies, populations and school mixes across Wales. Second, by identifying a shortlist of schools in those LA areas that reflected a range and diversity of school characteristics, learner populations and community backgrounds at a local level.

The purpose of this two-stage, purposive sampling approach was to capture the variety of ways in which UPFSM has been delivered and experienced across Wales. Doing so would ensure that the findings are relevant to different schools, catering systems and communities. It would also identify aspects that work well and challenges that exist in different settings. A list of data sources used is provided in Table 7.3.2.

Step 1: Selecting LA areas

The evaluation team selected a set of seven LA areas that reflected a range of characteristics at an area level. This was done by analysing publicly available information on the geography, population and school mix of LAs, as well as information provided by the Welsh Government on UPFSM rollout. The review assessed data on the following factors:

- Geographic factors including the economic region, population, population density and proportion of urban and rural areas.
- Socio-economic factors and population characteristics including deprivation affecting children, eligibility for eFSM and ethnic backgrounds of the resident population.
- Size and characteristics of the schools including the number and type of schools, average learners per school, language medium and faith status. The selection included

- Rollout of UPFSM including the type of catering provider, average UPFSM uptake, date of final UPFSM rollout and number of UPFSM rollout events.

The selection includes LA areas across North, Mid and South West and South East Wales, reflecting areas with highly urban, mixed and highly rural populations. LA areas have varying levels of child deprivation, eFSM eligibility and proportions of residents from ethnic groups other than White British, Welsh, English, Scottish and Northern Irish, with areas below, above and near the national averages represented. There is substantial variation in the school structure across the selected LA areas, including in the number of schools operated by the LA, their size, the existence of middle schools and nurseries and in the proportion of schools that are Welsh-medium, English-medium or dual language.

The catering contexts in the selected LA areas also differ, reflecting that school meal services are mostly operated by LAs, while some are operated by LA trading companies and private contractors. It also reflects the substantial diversity of UPFSM uptake across LA areas and that LA areas rolled out earlier than, near to and after the dates advised by the Welsh Government.

Step 2: Shortlisting schools

The evaluation team aimed to conduct two school visits in each LA area, to show multiple ways that UPFSM has been implemented and experienced within those areas. To do so, the evaluation team analysed publicly available information on the characteristics and learner population of individual schools. The review assessed data on the following factors:

- School characteristics including the type (primary or middle), language medium and faith status. This also included the urban-rural classification of the surrounding area, although learners may come from further afield.
- Learner characteristics including the learner population, eFSM status and ethnic background.

The review resulted in a set of criteria for each case study in the LA areas, which were used to determine a narrowed list of schools to engage in recruitment activities. The combinations have not been shared to maintain confidentiality; an example is provided below:

“A larger, English medium primary school in a primarily urban area with higher eFSM eligibility and a higher proportion of learners from ethnic groups other than White British, Welsh, English, Scottish or Northern Irish”.

Quality issues

The evaluation team faced minimal quality issues when executing the sampling approach at an LA level, as information is readily available on LA populations, schools and learners. Information on rollout provided by the Welsh Government supported the evaluation team to understand general implementation trends at the LA level.

The evaluation team encountered more quality issues at the school level. While information on eFSM status and uptake is available, a lack of information on rollout of UPFSM at this

level meant that the evaluation team had to rely on assumptions of likely school uptake based on the LA-level data. Similarly, the evaluation team overcame a lack of comprehensive data on school catchment areas using spatial data on the surrounding area. This included by triangulating local deprivation statistics with data on the proportion of eFSM learners to understand likely deprivation levels and judging the extent to which learners came from urban or rural areas based on the classification of surrounding LSOAs.

Target

The evaluation team aimed to develop case studies of 14 schools across 7 LA areas. Two shortlists were produced for each LA area, representing different combinations of target characteristics; one case study would be developed from each shortlist. The evaluation team considered conducting an additional case study as a contingency where more information would be needed; it was decided that this would not be necessary.

Recruitment

Recruitment took place in April to June 2025. Schools were contacted to take part by phone and email; where email addresses were not publicly available, LA strategic leads for school catering and education provided support to contact relevant staff.

Initial contact was made with the schools that best matched the selection criteria in each area. Schools were informed about the purpose of the evaluation, what taking part would involve and given opportunities to ask questions. Where schools did not respond or were unable to take part, the evaluation team contacted other schools in the shortlist.

When schools indicated their willingness to take part, the evaluation team agreed to provisional dates with the head or senior leadership, before scheduling a short call to provide further details, discuss queries and agree to a draft schedule for the visit.

Participating schools were provided with an information pack that included:

- Information sheets explaining the purpose and format of the research activities, for school and catering staff, parents/carers and governors.
- Links to data privacy notices detailing how data would be collected, processed and stored for the research.
- Information sheets for learners, in an easy-to-read format.
- Draft posters advertising the coffee morning for parents/carers, to be used by schools.
- A checklist of actions for the school to complete before the visit, in order to ensure the visit could run smoothly and all relevant personnel had been informed.

Case study structure

Case study visits were structured over two days. As busy, variable environments, visiting schools over multiple days allows researchers to gain a richer understanding of how UPFSM has been implemented and experienced at the school. Doing so provides time to build rapport, conduct more research activities and build an understanding of the school

culture, as well as the opportunity to view two lunch services. Case study visits included the following activities:

- Interviews with school and catering staff including the head, bursar, head chef and teachers, as well as governors. These in-depth interviews gathered rich data on the school's experience of rollout, how meals are provided and any effects UPFSM is having on learners, the school environment and staffing.
- Informal 'conversations with a purpose' with other staff involved in school meals, including kitchen staff, administrative staff, midday supervisors, teachers and other support staff. The purpose of these brief and targeted engagements was to gather further insights from a range of staff, which could be conducted flexibly and minimise disruption for staff.
- Experiencing the lunchtime service to observe how meals are prepared, served and eaten at the school. Over two lunchtime services, researchers explore aspects that worked well and their challenges in action. Lunchtime also served as an opportunity to have informal conversations with learners, as eating a meal together can provide a relaxed environment to share their thoughts freely on school meals.
- Conversations with parents and carers through small focus groups or coffee mornings that were organised and advertised in advance with the school's support. These provided opportunities to explore parents and carers' views on UPFSM, any changes they have noticed and their thoughts on school meals.
- Focus group discussions with learners in years 3 – 6, which were organised with the school's support. The purpose was to explore their experiences of school meals before and after the rollout of UPFSM, their dietary needs and preferences, how choices are made and suggestions for improvement. Junior-level learners were selected to hear their mixed and honest personal views.

Table 7: Language medium and numbers of participants per school case study

School ID	Language Medium	Number of interviewees and informal conversations
1	English	52
2	English	19
3	English	51
4	Welsh	15
5	Dual	52
6	English	42
7	Welsh	13
8	Welsh	18
9	Welsh	33
10	English	51
11	Welsh	32
12	English	22
13	English	31
Total	7 English, 5 Welsh, 1 Dual	431

Research tools were developed in Welsh and English, which were provided to researchers in a comprehensive research pack. Topic guides were developed for each activity and stakeholder type and integrated the evaluation framework and research questions. Plain language was used to ensure researchers could engage stakeholders accessibly and with convenience; researchers were provided with an easy-to-read topic guide for focus groups with learners and a checklist to guide their observations.