

Pledge to plate:

Making sure every primary school pupil gets a Free School Meal

SEFYDLIAD
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FOUNDATION

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1. Summary

The Labour/Plaid Cymru Co-operation Agreement contained a pledge to provide Free School Meals to all primary school pupils. This pledge will have a transformative effect on many families. This report sets out to explore what are the barriers to implementation and to consider practical solutions to ensure that the policy is implemented rapidly and effectively.

1.1 Principles

Three principles should underpin the roll-out of universal school meals:

1. The pace of the roll-out should not be determined by the slowest schools/ local authorities.
2. Schools and local authorities that are not ready for full implementation should be provided with temporary flexibility to alter the way that they provide FSM to ensure that all eligible children receive a meal.
3. Measures should be taken to protect older children living in poverty who will not be eligible for FSMs whilst the policy is implemented.

1.2 Key findings

There are three primary barriers to the effective implementation of universal free school meals.

1. The physical capacity of school dining and catering facilities.
2. Pressure on both global and local supply chains are likely to cause cost and delivery pressures.
3. Pressures on staff capacity.

1.3 Solutions

There are ready solutions to these challenges:

- The Welsh Government should permit local authorities to serve healthy, cold meals in schools whose facilities are not ready for the immediate roll-out of universal hot food.
- Schools should be permitted to adopt flexible approaches to school lunchtimes including providing lunches in classrooms and the use of multiple sittings as capacity is increased.
- No parent or guardian should have to make an application for universal school meals.
- The Welsh Government should provide greater public clarity as to its plans to implement its FSM pledge, including its funding plans.
- The Welsh Government should work with local authorities to ensure that funds are provided to all primary schools to enable them to provide children whose families are struggling as a result of the cost-of-living crisis with a meal whilst universal FSM are rolled out.
- Schools and local authorities should work closely with families who fall into debt on their school meals.

- The Welsh Government should confirm that children from families who have no recourse to public funds will receive Free School Meals as part of its policy to provide universal meals.
- The Welsh Government should work towards providing Free School Meals in all secondary schools in Wales.

2. Introduction

Wales has the least generous provision of Free School Meals (FSM) of all the UK's nations.¹ In Wales a child is eligible for FSM if they attend a maintained school and their family receive a means-tested benefit or they receive Universal Credit and have an earned income of less than £7,400 a year.² Several transitional protections are available to recipients of FSM while Universal Credit is rolled out.³

These eligibility criteria see thousands of children miss out on FSM each year despite living in poverty. Research undertaken in 2021 estimated that approximately 30,000 children living in poverty miss out on FSM because their family incomes are above the FSM threshold but below the poverty line.⁴

At outset of pandemic the Welsh Government took the bold step of providing FSM over holidays, and of making cash payments in lieu of FSM when schools closed. This decision provided a lifeline to many children and their families, although not to those living in poverty but ineligible for FSM.

In December 2021 the Welsh Government announced that it would introduce universal FSM for all primary school children, to be delivered as part of the co-operation agreement reached between Labour and Plaid Cymru.⁵ The Welsh Government has, to date, pledged to invest an additional £90m to deliver this commitment in stages, with the pledge expected to be implemented in full in 2024/25.⁶

The decision to roll out FSM to all primary school pupils has received near universal support. The expectation is that the policy will be rolled out on an age-based approach over a period of three years, with the youngest children being the first to benefit from universal provision.

A lack of detail on the scale, pace and method of rollout means there are several crucial questions that remain unanswered less than six months before the programme is expected to start. These have raised concerns that some older primary children will not receive a universal FSM until September 2025. Even among younger children who are expected to benefit first, there are concerns that not all children will receive a free meal in first or even second term of the 2022/23 academic year.

Meanwhile huge pressure continues to build on low-income households, with the legacy of the pandemic, cuts to benefits and high inflation all squeezing incomes. Research

¹ Child Poverty Action Group, *Call for more Free School Meals in Wales*, (December 2020) available at - <https://cpag.org.uk/sites/default/files/files/policypost/CPAG%20FSM%20policy%20briefing%20-%20Cymru%20-%20December%202020.pdf>

² *ibid*

³ *ibid*

⁴ Bevan Foundation and Policy in Practice, *Expanding the Provision of Free School Meals in Wales* (May 2021) available at - <https://www.bevanfoundation.org/wp-content/uploads/2021/05/Extending-the-provision-of-Free-School-Meals-in-Wales-Policy-in-Practice-final.pdf>

⁵ Welsh Government, *The Co-operation Agreement 2021* (December 2021) available at - <https://gov.wales/sites/default/files/publications/2021-11/cooperation-agreement-2021.pdf>

⁶ Welsh Government, *Draft Budget 2022/23* (December 2021) available at - <https://gov.wales/sites/default/files/publications/2021-12/2022-2023-draft-budget-narrative.pdf.pdf>

undertaken by the Bevan Foundation in December 2021 found that more than a quarter of Welsh households have had to cut back on food for adults, whilst one in ten households with two children had cut back on food for children.⁷ It is clear that early implementation of universal free primary school meals will help many struggling families.

The Bevan Foundation has therefore decided to explore the progress is being made towards the target of providing universal FSM in Welsh primary schools, and the barriers that might inhibit progress. The implementation of the pledge to provide FSM to all primary school children in Wales will have a transformative effect on many families. It is therefore imperative that the policy is implemented in line with the timetable set out in the Co-operation Agreement at the latest. To achieve this aim, there are three principles that should underpin the policy's implementation:

1. The pace of the roll-out should not be determined by the slowest schools or local authorities.
2. Schools and local authorities that are not ready for full implementation should be provided with temporary flexibility to alter the way that they provide FSM to ensure that all eligible children receive a meal.
3. Measures should be taken to protect older children living in poverty who will not be eligible for FSMs whilst the policy is implemented.

2.1 What we did

To explore the challenges of rolling out FSM to all primary school pupils the Bevan Foundation held two virtual roundtable meetings with stakeholders from all over Wales. In total 25 people attended the roundtables including representatives from local authority catering teams, local authority revenue and benefits teams and relevant education trade unions.

The roundtables built on work undertaken by the Bevan Foundation in spring 2021.⁸ This included a webinar that was held in June 2021 at which Jayne Jones of Argyll and Bute Council shared the experiences of Scottish local authorities as they had sought to implement universal school meals.⁹

⁷ Bevan Foundation, *A snapshot of poverty in Winter 2021* (December 2021) available at - <https://www.bevanfoundation.org/wp-content/uploads/2021/12/A-snapshot-of-poverty-in-winter-2021-.pdf>

⁸ Bevan Foundation n(4) and Bevan Foundation, *Expanding the provision of Free School Meals in Wales: Practical considerations* (May 2021) available at - <https://www.bevanfoundation.org/resources/expanding-the-provision-of-free-school-meals-in-wales-practical-considerations/>

⁹ Bevan Foundation, *Meeting the challenge of Free School Meals for more children* (June 2021) video available at - <https://www.bevanfoundation.org/events/discussion-on-free-school-meals/>

3. Key findings on current position

In 2020/21, 23% of all primary pupils in Wales were eligible for a Free School Meal or had transitional protection, some 63,350 children. Around a quarter of pupils have a paid-for school meal, and the rest bring a packed lunch or make other arrangements. Extending provision will mean providing a free meal for some more 200,000 pupils than at present – no small challenge.

Even now, we have heard of some schools that are not currently providing meals to any pupils because of capacity and staffing constraints. As the implementation of universal FSM is rolled out, these and other barriers may, if not addressed, cause schools and local authorities to deliver the policy on a slower timetable than envisaged.

These challenges faced by schools and local authorities can be divided into three broad categories:

- Physical capacity
- Supply chains
- Staff capacity.

3.1 Physical capacity

The most significant barrier to the rapid implementation of universal FSM is a lack of physical capacity within schools. Local authorities are currently undertaking an audit of their facilities to gain a better understanding of what work will need to be undertaken before they are able to accommodate an increase in demand for school meals.

Concerns regarding physical capacity relate to both the physical space within schools for children to eat their meals, and the space required to prepare the food.

Some schools already have sufficient capacity.

Some schools will be fine, there won't be a problem at all. Some will be working exactly as they are at the moment; nothing will be different. We have some schools where all the children eat at the moment and they all eat in the dining hall, it's not going to be an issue.

Local authority officer, roundtable 16 March 2022

Others, however, will require significant alterations. There are many schools across Wales which already struggle to accommodate all children at lunchtime. Some require children who bring a packed lunch into school to eat their lunch in the classroom while others have multiple sittings for school meals. There are concerns about the practicality of such arrangements continuing as the number of children who eat school meals increase.

In schools that currently use classrooms, there are concerns about whether it is appropriate to serve hot meals in such settings. Adding extra sittings on the other hand could put pressure on the school day, affecting the time allocated for lessons, and making it more difficult for schools to provide adequate staff cover during lunchtimes.

Any investment in increasing capacity for children eating their meals will need to be made alongside investment in increasing the capacity of school kitchens. This includes purchasing new equipment and physically making kitchens larger. Some schools will

require only modest alterations if any at all, but others will require significant work. This will not only have cost implications but will also take time.

We have some kitchens that are going to have to be completely revamped. One of our kitchens is going to have to be closed for 20 weeks is the estimation that we've been given.

Local authority officer, roundtable 22 March 2022

Some local authorities are looking at alternative methods of providing school meals whilst capacity is increased. Options under consideration include greater provision of cold meals, use of facilities off school sites and investment in some temporary increases in catering capacity. However, to maximise value for money and to minimise disruption local authorities are eager to make as all the required alterations to school kitchens in one go. There are concerns that this may prove to be difficult under current proposals.

It is still unclear how capital funding will be released to local authorities to enable them to make required alterations to school kitchens. The Welsh Government have recently announced an initial investment of £25m to kick start implementation.¹⁰ Further investment will be needed for the implementation to be completed. There are concerns that if funding is spread over a three-year period, local authorities will be forced to look for temporary solutions in some schools, leading to extra costs and more disruption.

3.2 Supply chains

Supply chain issues could affect both the ability of local authorities to make the required capital investments to increase capacity and have long term resource implications.

Global supply chains have been under significant stress since the outbreak of Covid-19. Increased global demand as economies reopen and the war in Ukraine suggest that these pressures are likely to continue into the medium term. These pressures are affecting the ability of local authorities to access materials to make the required alterations to increase the capacity of schools in Wales as well as the availability of food.

More local factors are also having an impact on supply chains. With hundreds of schools in Wales requiring alterations the demand for some equipment has increased dramatically. This means it is taking longer for suppliers to deliver some equipment such as new ovens.

I've already tentatively looked at purchasing combination ovens and he's told me that there's already a 14-week delay in getting them, whereas two, three years ago I could have had them within a week, two weeks at most.

Local authority officer, roundtable, 16 March 2022

There is also likely to be a shortage of contractors over the coming months. With only a few specialist contractors operating across Wales it is likely some schools and local

¹⁰ Welsh Government, *£25m to kick-start free school meals for all primary school children in Wales* (March 2022) available at - https://gov.wales/25m-kick-start-free-school-meals-all-primary-school-children-wales?utm_source=rss-announcements&utm_medium=rss-feed&utm_campaign=announcements-%C2%A325m+to+kick-start+free+school+meals+for+all+primary+school+children+in+Wales

authorities will be competing to get works completed in time for September 2022, impeding progress towards implementation.

Supply chain issues are likely to affect access to food as well. Welsh schools will not be immune from rising global food prices.

I don't think we should underestimate the impact that the Ukraine crisis is likely to have on all of us... there are going to be significant impacts in terms of food costs. A couple of weeks ago our supplier was indicating that there might be a 30% increase in the price of chicken. Ukraine is a country that process a lot of animal feed so that is going to have an effect, also cooking oil, those type of products. So, I think that's going to significantly impact on the roll out.

Local authority officer, roundtable 22 March 2022

More local factors will also have an impact on accessing food. Increased demand for school meals will in turn see local authorities put greater demand on their suppliers. There are concerns that this could lead to increase cost with the small number of suppliers operating in Wales competing for resources.

3.3 Staff capacity

Pressures on staff capacity are likely to present a challenge to local authorities and schools as they begin the process of providing FSM on a universal basis.

At local authority level there are concerns that revenue and benefits teams will come under significant pressure. The information provided to local authorities to date indicate that all children will have to apply for FSM once it becomes available universally. The reason given for this is that an application is required under existing legislation and is required for data purposes.

Across Wales local authorities will be tasked with processing nearly 80,000 extra applications by the time that universal FSM are rolled out to all children in reception to year 2.¹¹ Some local authorities are already planning on recruiting more staff to manage the process.

We're already looking at appointing six new members of staff if the Welsh Government insist on an application, so that's one of the main stumbling blocks for us.

Local authority officer, roundtable 22 March 2022

The requirement for an application risks undermining two of the major advantages of providing FSM on a universal rather than a means tested basis. First, the requirement for a parent or guardian to apply creates a barrier that may see some children go without FSM. Second, when the Bevan Foundation explored the challenges and opportunities of expanding FSM in 2021, stakeholders had assumed that universal provision would be accompanied with a removal of the application process. This was expected to save staff

¹¹ Bevan Foundation n(4)

time and money.¹² The decision to require an application to be submitted not only undermines that opportunity but makes life more difficult for local authorities.

Staff capacity within schools is also likely to present a challenge to rapid implementation of universal FSM. Catering teams are finding it difficult to recruit staff to meet current demands. The roll-out of universal FSM is expected to see demand increase, meaning that more catering staff will need to be recruited.

Increased provision could also put greater pressure on existing staff. There is still some uncertainty about whether some schools will require caterers to work extra hours to get all the day's food prepared and delivered. These challenges are likely to be even more pronounced in schools that are not able to adequately recruit extra staff.

It's not just catering staff that could come under pressure. If schools are required to run extra sittings, pressure could build on teachers, or staff that supervise lunch times.

We know in many settings that teachers' assistants and teachers themselves cover lunch breaks. Now, if we are seeing, what one of my colleagues describes as Christmas dinner every day, then we are not going to have the staff on the ground to manage this, no matter how we try...

Trade Union representative, roundtable 16 March 2022

There are concerns that such pressures could lead to staff terms and conditions being changed, with staff being expected to work extra hours over lunchtime.

¹² Bevan Foundation n(8)

4. Prioritising low-income children

FSMs are an important part of children's rights to food. There is a wealth of evidence that demonstrates the educational, wellbeing and health benefits FSM offer to children. It also offers a vital tool to help reduce household costs, freeing up resources to meet basic needs. Ensuring rapid implementation of the commitment to provide universal FSM is imperative.

Given the challenges outlined above, it is highly unlikely that it would be possible to rollout FSMs to all primary school pupils by September 2022. With thousands of families struggling to make ends meet it is therefore important to consider the measures that could be taken to ensure that low-income children are prioritised as the policy is implemented.

4.1 An income-based approach

An alternative approach to implementing the Welsh Government's pledge to provide FSMs universally to all primary school pupils would be to take an income-based rather than an age-based approach. What this would mean in practice is that rather than rolling out universal FSMs by age group the Welsh Government could increase the eligibility thresholds for FSM over time until all children were eligible.

For example, one local authority officer suggested that in 2022/23 all children whose families are eligible for the Council Tax Reduction Scheme could become eligible for FSM. In 2023/24 this could increase to all children whose families are eligible for Universal Credit, before being made available to all children in 2024/25.

There is broad support for taking such an approach among stakeholders. Doing so would ensure that low-income children benefit first from increased provision, meaning that support is targeted at those that need it the most. There are some practical considerations that may mean that it is too late to adopt such an approach at this stage.

The public statements made by the Welsh Government on how the universal FSM will be provided will mean that many parents and carers of younger children will expect their child to receive FSM in September. Any change at this point could lead to an influx of queries to local authorities, taking up already stretched resources.

The number of children who will become eligible for FSM under such an approach is likely to be spread less equally across schools in Wales than by taking an age-based approach. Some schools would likely see a significant increase in the number of eligible children if eligibility was increased to all children whose families receive Universal Credit whilst others would see a more modest increase. This would mean that investment in increasing capacity would need to be targeted differently.

4.2 Alternative approaches

If the practicalities of taking an income-based approach to rollout are too great to be surmounted there are other tools available at the disposal of the Welsh Government that could see children from low-income households supported.

One interim measure could be to allow schools to offer healthy, cold meals whilst capacity is increased. This is an option that is actively being considered by many Welsh local authorities.

If this is a rollout to give everybody a meal, we think it's better for them to have a packed lunch made by the school, because some of the packed lunches they get from home, they've got bars of chocolate, at least then we know they get a healthy cold meal.

Local authority officer, roundtable, 16 March 2022.

Taking such a pragmatic approach could enable a more rapid implementation of universal FSMs as capacity is increased to provide all children with a hot meal if they wish to have one.

A second measure could be to provide hardship funds to schools to allow them to provide a meal to older children whose families are struggling financially whilst the rollout is completed. There are concerns from some stakeholders that taking such an approach could see a lack of consistency across Wales, with the level of support available to families being dependent on the attitudes and approaches of individual teachers and headteachers. Others, however, think that there is a role for such an approach as an interim measure.

In a lot of our areas (school leaders) are community leaders as well. They know their families better than anybody and if they think there may be a need for Johnny and Michelle to have lunch then they're best placed to know that. So as an interim, as a quick fix then that could be an easier quicker solution.

Trade union representative, roundtable 16 March 2022.

A further interim measure is for schools and local authorities to work more closely with families that have fallen into debt on their school lunch. If a family has fallen behind on their school dinner money, this is often an indication of further pressures on resources. Some local authorities already work closely with schools in their communities to sign post families to sources of support and to ensure that they receive all the benefits they are entitled to. Implementing such an approach more consistently across Wales could provide support to families as universal FSMs are rolled out.

5. Solutions

As this report has highlighted there are some significant hurdles that must be overcome to secure the aim of providing all primary school children with FSMs. There are ready solutions at hand that, however, that, if adopted, will ensure that thousands more children benefit from FSM this September.

5.1 Provide healthy cold food

The Welsh Government should permit local authorities to serve healthy, cold meals in schools whose facilities are not ready for the immediate roll-out of universal hot food. This would ensure that all children that are in Foundation Phase are provided with a healthy meal from September, even if their school does not yet have the capacity to provide every child with a hot meal. The Welsh Government should make it clear that it will not be acceptable for any school to fail to provide FSM during the policy's roll-out.

5.2 Adopt flexible approaches to school lunchtimes

As this report has highlighted there are concerns that schools will lack space for all children to eat their meal at lunchtime. It should be noted however, that almost all primary school pupils will be currently eating their school meals on site during lunch time, even if this does mean that children who bring packed lunches eat theirs in classrooms whilst other schools run multiple sittings.

Whilst providing school meals in classrooms is not desirable, schools that already require children who bring packed lunches to eat theirs in the classroom should be permitted to allow children to eat their school meals in the classroom whilst capacity is increased.

5.3 Do not require an application for FSMs.

The Welsh Government should work with local authorities to ensure that no family will have to apply for FSMs. If the Welsh Government is required to enact legislation to remove this requirement, then it should do so as a matter of urgency. In the interim, it should work with local authorities to explore what processes are already in place that could duplicate as an application for FSMs. For example, for children starting school in September 2022, could a tick box option be added to school application forms?

If there are concerns that local authorities and the Welsh Government will lack data to operate other policies without an application for FSM the Bevan Foundation outlined a number of alternative approaches that could be adopted in its report in May 2021.¹³ Among the easiest to roll out would be to use data on the number of children applying for PDG Access instead of data on FSM applications.

5.4 Provide clarity and funding

The Welsh Government should provide greater public clarity as to its plans to implement its FSM pledge. Recent announcements have spoken of the "youngest children" but do not name the year groups that will benefit first.¹⁴ Doing so will provide local authorities and schools with greater certainty as to what they are expected to deliver and would

¹³ *ibid*

¹⁴ Welsh Government n(10)

provide parents with more information as to when they could expect to benefit from the policy.

To coincide with this the Welsh Government should provide local authorities with clear information as to the total capital funding they will be provided and the timeline for which this will become available.

5.5 Provide schools with a hardship fund

The Welsh Government should work with local authorities to ensure that funds are provided to all primary schools to enable them to provide children whose families are struggling as a result of the cost-of-living crisis with a meal whilst universal FSM are rolled out. This will ensure that the poorest children are protected during roll-out.

5.6 Schools and local authorities should work with families

Schools and local authorities should work closely with families who fall into debt on their school meals. Families should be sign posted as to where they can access advice on how to maximise their income and ensure that they are accessing all the benefits they are entitled to.

5.7 Provide FSM to all children who have no recourse to public funds

The Welsh Government should confirm that children from families who have no recourse to public funds will receive FSM as part of its policy to provide universal meals. This commitment should be extended to cover older children to ensure that all children from families who have no recourse to public funds benefit from a FSM.

5.8 Roll-out universal FSM in secondary schools

Whilst the decision to provide FSM to all primary school pupils is a welcomed one it is important that we do not lose sight that thousands of older children will continue to be denied access to FSM despite living in poverty. The cost-of-living crisis is not exclusively affecting the parents of primary school aged children, families with older children are also likely to be struggling. The Welsh Government should therefore commit to expanding FSM to all children in secondary schools and immediately begin work to ensure that the policy is implemented swiftly after the policy is successfully implemented in primary schools.