

## FULL EQUALITY IMPACT ASSESSMENT

Stopping Policy: Free School Meals Pilot extensions & FSM eligibility extensions

### **Decision not to proceed with extension of eligibility to free school meals and with extension of pilots of universal free school meals for primary school pupils.**

This impact assessment relates to the decision not to proceed with:

- a)** extension of the current universal free school meals (FSM) pilot at primary level to a limited additional number of local authorities (from 2 at present); and
- b)** extension of free school meals *eligibility* to all pupils in maintained nurseries and Key Stages 1 and 2 in England, whose parents are on Working Tax Credit with household incomes of up to £16,190. .

Implementation of (b) was scheduled to begin in September 2010, on a phased basis, starting with pupils in maintained nurseries and Key Stage 1. Full extension to all maintained nursery and primary pupils was planned for September 2011. Implementation was subject to the necessary funding being available and the laying of regulations before Parliament.

### **Description of the policy**

Free school meals are currently available to:

- all pupils from non-working families on benefits;
- primary pupils in 2 local authorities (Durham and Newham) taking part in a Government-funded pilot to evaluate the benefits of universally provided FSMs; and,
- primary and secondary pupils in a further Government-funded local authority pilot (Wolverhampton) that extends eligibility for FSMs to families in receipt of Working Tax Credit and on low incomes.

For the pilot areas, baseline information has been collected on diet, eating habits, behaviour and concentration, obesity and attainment. Data will be collected again in summer 2011 and the results of the 3 pilots will be available in early 2012.

The previous Administration decided in December 2009 to extend the pilots to additional local authorities for one year only from September 2010. The previous Administration also proposed extending eligibility to free school meals to pupils in maintained nurseries and primary schools in England whose families are in receipt of Working Tax Credit, with household incomes up to £16,190. However, funding was only available for one year and only for the first phase: extending eligibility to pupils in maintained nurseries and Key Stage 1. The funding available for the first year fell short of the total cost by £40m.

The coalition Government has decided, primarily on fiscal grounds, not to fund the additional pilots or to proceed with the universal extension of eligibility for FSMs, but to wait until the outcome of the 3 pilots is known, thereby providing a more substantial evidence base for future policy decisions. The underfunding of the previous Administration's proposals – funding in year one was inadequate and no funding had been provided beyond year 1 – equated to a total funding shortfall of £295m over the 3

years from 2010-11. The coalition Government took the view that protecting spending on direct provision to improve the educational attainment of poorer families was a more effective way of reducing inequalities than extending spending on free meals (see also below)

The communities in the proposed LA pilot areas will be disappointed by the postponement, but as pilots had not yet started and regulations were not yet laid, families were not receiving the 'benefits' of this policy and so will not be worse off as a result of the pilots not proceeding.

Similarly since the proposed extension of eligibility to FSM had not proceeded, no-one is worse off. All those currently eligible for FSMs continue to receive them and Government continues to promote their take up by eligible families.

### **The evidence base**

Access to free school meals is means-tested and open to all eligible families who apply for them. Although FSMs are not always taken up by those eligible, there is no evidence of inequalities for any particular groups in the present arrangements, which will remain in place.

There is increasing evidence that a healthy school lunch, whether free or paid for, can have a positive impact on pupils' behaviour, alertness, concentration and their performance at school directly and indirectly<sup>1234</sup>. For some pupils from low income families school lunch may be their only nutritionally balanced meal of the day. We do not, however, yet have clear evidence of a direct link between diet and educational attainment. There is very strong evidence that improving the educational attainment of poorer pupils is the most effective way of reducing inequalities.

The outcome of the present 3 FSM pilots in Newham, Durham and Wolverhampton will provide additional evidence in due course, including on the impact of free school meals on low income and other families, which can be used to inform future policy decisions.

### **What the evidence shows – key facts**

<sup>1</sup> Belot and James (2009) Healthy school meals and educational outcomes. This showed that the intervention in Greenwich resulted in higher SATS scores compared with similar LAs with no intervention.

<sup>2</sup> School Food Trust: School lunch and behaviour in primary schools. Pupils' alertness increased, resulting in a three-fold greater engagement with teachers in four intervention schools compared with two control schools in Sheffield.

<sup>3</sup> Bellisle (2004) Effects of diet on behaviour and cognition in children, *British Journal of Nutrition*. A review paper suggests that recent findings are showing a more consistent link between improved nutrition and school performance and behaviour.

<sup>4</sup> School Food Trust: School lunch and behaviour in secondary schools (published July 2009). The study shows that following improvements to the dining environment and to the nutritional quality of the food served, pupils in seven intervention schools were 18% more likely to be on task and 14% less likely to be off task than pupils in four similar control schools. These findings were based on objective measures of behaviour in the classroom.

**a) Not proceeding with a number of additional pilots of universal FSM provision for all primary-age children regardless of family income**

**Disability** (NOTE: figures not available for disabled children, only for those with statements of SEN which have been used as a proxy for disability)

Not proceeding with the additional pilots will have a low impact on pupils identified as having statements of SEN, since those not currently eligible for FSMs are less likely to have a statement of SEN than those that are.

**Ethnicity**

According to the most recent Annual Schools Census, a high proportion of pupils at maintained primary schools currently eligible for FSMs are from an ethnic minority (as follows):

- White 16.3%
- Mixed 26.9%
- Asian 20.2%
- Black 38.3%
- All pupils 18.5%

The proposed additional pilots of universal FSM for primary pupils would benefit all pupils not currently registered as eligible for FSM. Not proceeding will therefore have a disproportionately low impact on pupils from Black and Mixed ethnic groups relative to other ethnic groups.

Of the 5 LAs that had planned to take part in the proposed additional universal FSM pilots, 3 have a high proportion of residents from minority ethnic groups (Islington, Nottingham and Bradford).

**Gender:** no impact since there is no evidence that the take up of free school meals is influenced by gender.

**b) Not extending the FSM criteria to include pupils from in-work households with incomes below £16,190 (currently only pupils from out of work households with incomes below £16,190 are eligible for FSMs):**

**Disability**

There is no information available on the numbers of children with a disability or the numbers of stated children in working households with an income up to £16,190.

**If** children with disabilities were disproportionately represented in working households in this income bracket, the extension of eligibility would have had a disproportionately high impact on them. However since the plans were not implemented they never had this benefit and so have not in practice lost any ground relative to other groups.

**Ethnicity**

### **As with disability we do not have data on the numbers of BME children in low income (below £16190) households**

If the number of BME pupils in low income in-work families is similar to the proportion of pupils from low income out of work families the extension of eligibility would have had a disproportionately high impact on them. However since the plans were not implemented they never had this benefit and so have not in practice lost any ground relative to other groups.

**Gender:** no impact since there is no evidence that the take up of free school meals is influenced by gender.

### **Challenges and opportunities**

**Disability and Ethnicity** Promoting the take up of FSMs will continue for all eligible families across England, ensuring that ALL families that are eligible are encouraged to take up their rights. We know that children with disabilities and certain ethnic groups are disproportionately represented in the non-working families on benefits who are currently eligible for FSM and will remain so. Pupils with disabilities and those from minority communities will therefore continue to benefit from work by the School Food Trust and local authorities to encourage more of those already eligible to take up their entitlement.

Cashless catering systems are known to help avoid the stigmatisation of those receiving FSMs as pupils do not stand out as disadvantaged or 'different' with such systems. These systems therefore benefit all disadvantaged groups. The introduction of such systems is a local decision, but it is known that, where budgets permit, many LAs are working towards their introduction.

Research shows that lunch take-up is often related to the condition of school dining areas - the Department has invested £150m between 2008-2011 to improve the capital infrastructure of school kitchens and dining rooms. It is expected that this work will lead to increased take up of FSMs (as well as paid for meals). Resource implications may prove challenging for some LAs as match funding is required for this work.

### **Equality impact assessment**

The decision not to fund additional pilots of universal FSM has had no or low impact in terms of the relative position of disabled or BME pupils or pupils of particular gender, because all primary pupils in the local authority areas concerned would have benefited equally. The decision not to proceed with a universal extension of eligibility to in-work households with primary age children and incomes below £16,190 has no impact in terms of gender. Proceeding with the extension might have had a positive impact on families with disabled children or BME families as it is likely that these families are disproportionately represented in this income band. However, as the proposed extension was never implemented, no families have lost any benefits. Proceeding would have had a significant opportunity cost and in the current financial climate it is important to ensure resources are targeted at the neediest pupils in the most effective way to achieve the best value for money. The link between the attainment of deprived pupils and the extension of

free school meal eligibility was not strong enough to justify the cost of the programme and instead Ministers have given an undertaking to use the grant saved in 2010-11 (future budgets are subject to Spending Review discussions) more effectively to target additional support to improve the educational attainment of pupils from disadvantaged groups. As already noted there is very strong evidence that improving educational attainment of disadvantaged pupils is the single biggest contributor to reducing inequalities – in lifetime earnings and in wider health and well-being. The intention is to ensure even better targeting of those in need so as to raise the attainment of pupils including the disabled, low attaining BME groups and those from low income families in deprived areas. An announcement about these plans is due later in 2010.

### **Next steps**

The 3 pilot studies currently running will continue and their evaluation results will be available in 2012, when a decision on next steps will be taken by Ministers.

Ministers have given a commitment that the funding ear-marked for the additional pilots and the extension of FSM eligibility will be diverted to projects specifically targeted at disadvantaged pupils. Details will be announced later in 2010.

The Department will continue to support the provision of information, advice and guidance to parents on accessing FSMs and to LAs and schools to help them increase the take up of FSM by currently eligible families.

The Department is investigating the promotion of cashless catering systems via a national framework for procuring cashless catering equipment, which would help promote the take up of FSMs by removing the stigma often associated with receiving one.