National Assembly for Wales

Children and Young People Committee

EO 19

Inquiry into Educational Outcomes for Children from Low Income Households

Evidence from: City University London

- The effectiveness of Welsh Government policy and strategy in mitigating the link between poverty and educational outcomes, including the 'Tackling Poverty Action Plan'; relevant education policy; and broader Welsh Government policies in this regard, for example Communities First (1)
- Issues relevant to free school meals within this context, such as takeup rates, the perceived stigma of claiming free school meals, the use of free school meals as a proxy indicator for child poverty and the impact of the need to revise eligibility criteria arising from the introduction of Universal Credit (6)

Evidence taken from paper prepared for Masters in Food Policy, City University London: *Reform of the Welsh Free School Meals Service: How to reduce social exclusion of primary school children caused by food Poverty* Copyright Katie Palmer 2014 (KT_731@hotmail.com)

1. Issue:

- 1.1 One in three children are living in Poverty¹ in Wales, the highest rate of child poverty of any nation in the UK (Save the Children 2013). Ten of Wales' twenty-two local authorities have poverty levels higher than the UK average (Padley and Hirsch 2013)
- 1.2 The provision of Free School Meals (FSM) is a form of welfare provision which is directed specifically at addressing child poverty (Morelli and Seaman 2005). It helps to ensure that some of the poorest and most vulnerable children in communities have access to at least one balanced, nutritious meal a day.
- 1.3 The current system of FSM has found to be the least effective method of welfare provision (Morelli and Seaman 2005). The (FSM) service in Wales is ineffective with a third of school children living in poverty not entitled to FSM and 44% of entitled children not receiving FSM (Figure 1)
- 1.4 The eligibility criteria for FSM will have to be reviewed in Wales as Universal Credit is rolled out. In England all infants will be eligible for

¹ A household is considered to be in poverty if its income (after tax and adjusted for household size) is below 60% of the UK median for the year (JRF 2013)

FSM from April 2014. In 2010 Scotland pledged to provide free lunches for infants but has not done so and Northern Ireland is considering reviewing eligibility criteria in conjunction with the Universal credit system (Perry 2013).

1.5 Pisa has ranked Wales's education as worst in the UK (BBC 2013). Universal FSM have been found to increase attainment of infants (Kitchen et al 2012).

2. Objective:

Recommendations and policy options will be presented to reform the FSM service available to infants. This is an opportunity for Welsh Government to develop innovative policy around proportionate universalism that will reduce inequalities brought about through poverty.

2.1 Main Recommendations

Nine recommendations are made which include downstream and upstream options for making the FSM system more effective and equitable. A range of policy options are offered; the author recommends that:

Serious consideration is given to option D (Annex 2), the use of Proportionate Universalism to target the most deprived local authorities. This should be applied along side option F; using a combination of extending eligibility through Universal Credit and addressing issues preventing the take-up of FSM in the local authorities not targeted for Universal FSM.

3. Relevance to Ministers and Policy Background:

3.1 The issue of FSM crosses three Ministerial departments namely; Education and Skills, Communities and Tackling Poverty and Health and Social Services. This is reflected in the following key policy documents:

3.2 Education

- 3.2.1 The Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations came into force in September 2013 (Welsh Government 2013). This measure requires local authorities and governing bodies to promote healthy eating and drinking by pupils in maintained schools, encourage the take-up of school meals and define the nutrient content of school lunches.
- 3.2.2 The Welsh Governments **Education Programme** aim is to "Help everyone reach their potential, reduce inequality, and improve economic and social well-being" Specifically these proposals are relevant to the Programmes key actions to "improve school attainment".
- 3.2.3 This paper will address the issues of free school meal take-up, inequality within the current FSM system and the potential for FSM to improve attainment. The cost of child poverty is estimated at £29

billion a year. Improving social mobility by raising all children to current average levels of educational attainment could contribute £56 billion a year by 2050, (Social mobility and Child poverty Commission 2013).

3.3 Communities and Tackling Poverty

- 3.3.1 Wales has a statutory duty to tackle child poverty² under the **Children and Families (Wales) Measure** (Welsh Government 2010)
- 3.3.2 One of the three strategic objectives of **Welsh Governments Child Poverty Strategy (2011)** is "to reduce inequalities that exist in health, education and economic outcomes of children and families by improving the outcome of the poorest." The Department of Educations FSM evaluation (Kitchen et al 2013) found universal entitlement might help reduce educational inequalities.
- 3.3.3 The FSM system is ineffective in reducing the inequalities faced by the poorest communities in Wales. Adapting the FSM system could reduce these inequalities and contribute towards reducing child poverty.

3.4 Health

- 3.4.1 **Our Healthy Future's (Welsh Government 2009)** vision includes "the health of individuals experiencing the greatest disadvantage is improved to levels found among the more advantaged" and "Children and young people are given a good start in life that supports their long-term health and well-being".
- 3.4.2 The **Welsh Network of Healthy School Schemes (WNHSS)** encourages the development of local healthy school schemes within a national framework.
- 3.4.3 Consultation regarding a Public Health Bill in Wales is underway (Welsh Government 2013). Proposals for this bill could bring about legislation to place a duty on Welsh Ministers to consider health issues in policy making and a duty on a range of bodies to reduce health inequalities.
- 3.4.4 Health inequalities associated with food poverty include poor physical and mental health, heart disease, diabetes and strokes (London Assembly 2013). The National Child Measurement Programme 2011/12 (Humpreys et al 2013) found that a third of children in school reception classes across Wales are overweight or Obese. Addressing the FSM system could improve health inequalities.

4. Background:

² Child Poverty Act 2010 uses four measures including relative income –Household income less than 60 per cent of current medium income (HM Government 2012)

4.1 UK real median weekly earnings have fallen by 10.2% since 2009 and are now lower than in 1997 (Social Mobility and Child Poverty Commission). Falling income (after housing costs) and rising food prices have produced a double effect, reducing food affordability by over 20% for the lowest income households (DEFRA 2013). Low-income families spend more on food and have to spend even more to afford a healthy diet (Cooper and Dumpleton 2013). **The provision of FSM helps to ensure that some of the poorest and most vulnerable children in communities have access to at least one balanced, nutritious meal a day** (Harper and Wood 2009). FSM are currently offered to children in Wales whose parents receive certain support payments. An interim order in Wales has been placed so that the eligibility criteria include Universal Credit (Lewis 2013).

- 4.2 Welfare benefit provision remains a retained policy set by Westminster Parliament for the whole of the UK, however education and health provision are devolved policy areas for Wales. In September 2013 the UK coalition government announced spending of £600m on universal FSM for the first three years of primary school in England. Evaluation of the Universal Pilot schemes for the UK government found that offering FSM to all primary school children improved take-up and improved educational attainment at Key stage 1 and 2 by between four and eight weeks additional progress (Kitchen et al 2012). It was found that this particularly applied to children from less affluent families.
- 4.3 Welsh Government could receive around £30 million as part of the Barnet (formula), consequential of additional funding made available in England $\,$
- 4.4 Welsh Government has rejected calls to introduce universal FSM, reasserting their commitment to free school breakfasts Census Figures have shown that less than a quarter of pupils receiving free breakfasts are from poor backgrounds (walesonline 2010).
- 4.5 Welsh Government has made reducing the gap in achievement caused by poverty one of its three interrelated national priorities for Education in Wales (Egan 2013), however Pisa has ranked Wales's education as worst in the UK (BBC 2013).
- 4.6 Wales has a statutory duty to tackle child poverty³ under the Children and Families (Wales) measure (Welsh Government 2010). According to Save the Children (2013) one in three children are living in Poverty in Wales, the highest rate of child poverty of any nation in the UK. In Wales childhood poverty stands at between 11%-28% depending on local authority (Padley and Hirsh 2013). Ten of Wales' twenty-two local

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³ Child Poverty Act 2010 uses four measures including relative income –Household income less than 60 per cent of current medium income (HM Government 2012)

authorities have poverty levels higher than the UK average (20.2%) (Padley and Hirsch 2013). These are mainly concentrated in areas, which faced the collapse of their local economies and sources of employment in the 1980s, such as the South Wales Valleys (Egan 2012).

4.7 Almost half of all Welsh primary school children eligible for FSMs are concentrated in a fifth of the schools (Egan 2012) and in deprived areas such as the South Wales Valleys. In Blaenau Gwent for example 26% of pupils are eligible for FSMs compared to the 18.2% national average (Save the Children 2013).

4.8 FSM service is not reaching those who need it (Figure 1) either because, despite the fact they are in poverty they are not eligible for the service or those who are eligible are not accessing the service For example In Blaenau Gwent where 20% of the children and young people are living in severe poverty⁴, 31% of children who are eligible for FSMs are currently not receiving them (Save the Children 2013).

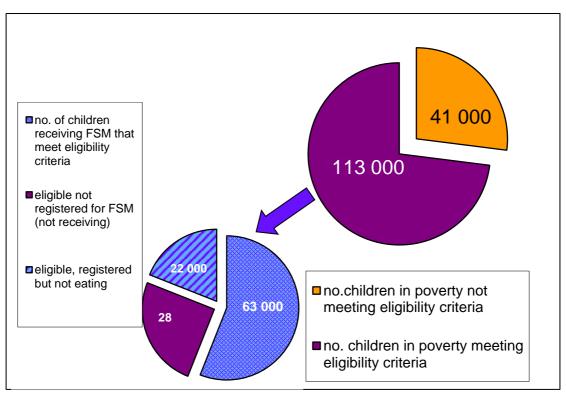


Figure 1 (copyright Katie Palmer 2013) Number of children in Poverty in Wales eligible for FSM and the breakdown of those eligible and receiving and not receiving FSM. Data taken from The Children's Society (2012).

4.9 Increased take-up of school meals makes more economic sense for local authorities as for the school foodservice to break even average take up needs to be above 50% (Dimbleby and Vincent 2013). The average take-up of school meals was 51% in 2007/8 but with a range of 36%-76% across Wales.

⁴ 50% or less of medium household income

5. Discussion and Policy Options

5.1 When compared to the UK, Wales has comparatively high levels of child poverty, low levels of educational attainment, high levels of childhood obesity and poor levels of FSM take up from those entitled (Figure 1). In addition Wales has a large number of children in poverty who are not entitled to FSM and should be (Figure 1).

Recommendation 1: Conduct a review of the eligibility criteria surrounding entitlement for FSM for infants and assess whether all those in poverty are a) eligible and b) receiving FSM.

Recommendation 2: Consider and address causes of poor FSM take up highlighted in Annex 1. This could be done in conjunction with the WNHSS.

5.2 The eligibility criteria for FSM will have to be reviewed in Wales as Universal Credit is rolled out.

Recommendation 3: Assess how the move to Universal Credit will impact those currently eligible for FSM and how it could be used to widen eligibility

5.3 Using the tax system to allocate FSM would eliminate issues surrounding accessibility of the service (Annex 1) 93% of Welsh taxpayers pay the basic rate of tax.

Recommendation 4: Conduct a feasibility study/consultation on extending eligibility for FSM using the basic rate of tax.

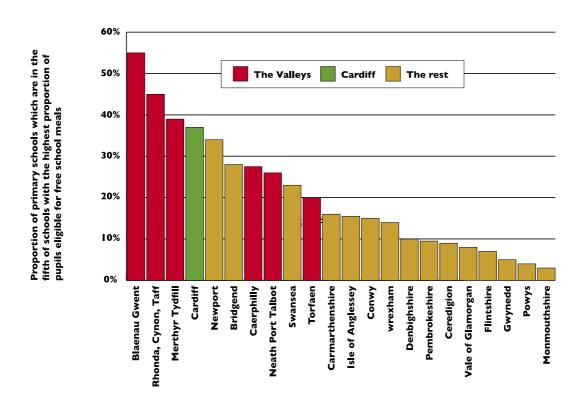
5.4 Egan (2013) in his recent report for Save the Children Wales highlights that a third or more of the primary schools have a high proportion of their pupils eligible for free school meals. These disadvantaged primary school children are concentrated geographically in the urban areas of Wales, particularly the post-industrial South Wales Valleys as illustrated in figure 2. This report provides sufficient evidence to consider using Proportionate Universalism as described by Marmot (2010) to deliver FSM to those local authorities with the highest levels of deprivation. This would deliver a FSM service with the "scale and intensity that is proportionate to the level of disadvantage" (Marcot 2010).

5.5 To tackle inequalities surrounding food poverty effectively Welsh Government also needs to consider extending support beyond the school

gates, particularly during the school holidays (London Assembly 2013). This could take the form of a voucher scheme for those in receipt of FSM.

Recommendation 5: Using Save the Children Wales conduct a feasibility study into the application of Proportionate Universalism to deliver a more equitable FSM service.

Recommendation 6: Explore options and cost implications for developing a "free holiday lunch scheme" for those eligible for FSM



Source: School & Teacher Statistics, Welsh Assembly Government; the data is the average for 2008 to 2010; updated Dec 2010, Joseph Rowntree Foundation Poverty Site: http://www.poverty.org.uk/w19/index.shtml

Figure 2 Proportion of schools with their pupils eligible for FSM taken from Egan (2013)

5.6. The Universal FSM pilot Kitchen et al (2012) highlighted that the positive effects of attainment were as a result of increased productivity in schools which could have arisen through the provision of FSMs directly or through the wider activities that accompanied the pilot, such as the promotion of school meals, or a combination of both. Any strategy to provide increased/Universal FSM would need a supporting infrastructure. Wales is at an advantage with The *Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations* 2013 (Welsh Government 2013). It requires local authorities and governing bodies to promote healthy eating

and drinking by pupils in maintained schools, encourage the take-up of school meals and define the nutrient content of school lunches. This policy however lacks strict guidelines concerning the content of packed lunches, a variable included in the FSM pilot. A policy to widen eligibility for FSM would therefore be supported (with some amendments) through existing legislation.

Recommendation 7: Ensure the Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations address the "wider activities" described in the FSM pilot as described by Kitchen et al (2013 pg 5).

- 5.7. It has been demonstrated that converting to Universal FSM raises participation among children who need the program most (Poppendieck 2010). The following policy options are outlined in Annex 2:
- A. Retain current system, take no action.
- B. Extend FSM eligibility using Universal Credit as proposed by the Northern Ireland Assembly (Perry 2013)
- C. Extend FSM eligibility using tax system so that only those paying basic tax at 20% would be eligible for FSM.
- D. Proportionate Universalism: Apply Universal FSM eligibility to (only) those local authorities with the highest proportion of primary schools which have a high proportion of their pupils eligible for free school meals.
- E. Universal Free School Meals
- F. Combine option B with a range of downstream policy options (Annex 1) to make the system more efficient and effective

Recommendation 8: Consider the Policy options outlined in Annex 2 and agree a policy option/s to explore further.

 The author recommends that serious consideration is given to option D "Proportionate Universalism" along side option F; using a combination of extending eligibility through Universal Credit and addressing issues preventing the take-up of FSM in the local authorities not targeted for Universal FSM.

Recommendation 9: Ideas for extending eligibility are shared with the other devolved administrations to see if a consensus approach can be found.

References

Bodden T (2012) 7% of the Welsh People are paying 33% of the Tax Daily Post.co.uk http://blogs.dailypost.co.uk/goginthebay/2012/11/7-of-the-welsh-people-are-payi.html [accessed 1.1.14]

BBC (2013) Pisa ranks Wales' education the worst in UK http://www.bbc.co.uk/news/uk-wales-25196974 [accessed 1.1.14]

BBC (2013) Plea for Wales to match England's Free School Lunches 18 September 2013 http://www.bbc.co.uk/news/uk-wales-politics-24146008 [accessed 20.10.13]

Cooper, N and Dumpleton, S (2013). Walking the Breadline the scandal of food poverty in 21st century Britain. Church Action on Poverty, Oxfam. www.church-poverty.org.uk/foodfuelfinance/walkingthebreadline/report/walkingth Ebreadlinefile [accessed 20.10.13]

DEFRA (2013) Food statistics pocketbook 2013 https://www.gov.uk/government/publications/food-statistics-pocketbook-2013 [accessed 20.10.13]

Dimbleby, H and Vincent, J (2013) The School Food Plan http://www.schoolfoodplan.com/wp-content/uploads/2013/07/School Food Plan 2013.pdf [accessed 20.11.13]

Egan, D (2012) Communities, families and schools together. Save the Children Wales May 2012

http://www.savethechildren.org.uk/sites/default/files/images/Communities-families-and-schools-together-report.pdf [accessed 20.10.13]

Harper, C and Wood, L (2009). **Please Sir? Can we have some more? Lessons from Free School Meal initiatives** School Food Trust http://www.childrensfoodtrust.org.uk/assets/research-reports/fsm please sir jan09.pdf [accessed 30.10.13]

Holownia, J and Harries, R (2010) Cost of Producing School Meals in Wales A report commissioned from the Wales Audit Office by the Welsh Assembly Government November Ref: 522A2010 November 2010 http://dera.ioe.ac.uk/11688/1/school_meals_report.pdf [accessed 20.10.13]

Humphreys C, Garcia, E and Causey R (2013) Child Measurement Programme Annual Report 2011/2012 Public Health Wales NHS Trust. http://www.wales.nhs.uk/siteplus/documents/888/child%20measurement%2 Oreport%20%28Eng%29.pdf [accessed 20.10.13]

Kitchen, S, Tanner, E, Brown, V and Payne, C, Crawford, C, Dearden, L, Greaves, E and Bryson, S (2012) *Evaluation of the Free School Meals Pilot Impact Report*: Department of Health. IFS, NatCen, Purdon Social Research

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/184047/DFE-RR227.pdf July 2012 [accessed 20.10.13]

Lang, T (2013) Heating or eating: why food is central in the 'new' politics of austerity. The Grocer Nov 9 2013

Lewis H (2013) Written Statement – Free School Lunches and Milk (Universal Credit) (Wales) Order. 16 August 2013 www.wales.gov.uk/about/cabinet/cabinetstatements/2013/freeschoollunch/?lang=eng

London Assembly (2013) A zero Hunger City: Tackling food poverty in London Health and Environment Committee March 2013 http://www.london.gov.uk/sites/default/files/A%20Zero%20Hunger%20City.doc.pdf [accessed 1.12.13]

Marmot (2010) Fair Society Healthy Lives (The Marmot Review) Strategic Review of Health Inequalities in Englan Post 2010 http://www.instituteofhealthequity.org/projects/fair-society-healthy-lives-the-marmot-review

Morelli, C, & Seaman, P 2005, 'Universal versus Targeted Benefits: The Distributional Effects of Free School Meals', *Environment And Planning C: Government And Policy*, 23, 4, pp. 583-598

Murphy, S., Moore, G.F., Tapper, K., Lynch, R., Clarke, R., Raisanen, L., Desousa, C. & Moore, L. 2011, "Free healthy breakfasts in primary schools: a cluster randomised controlled trial of a policy intervention in Wales, UK", Public health nutrition, vol. 14, no. 2, pp. 219-226.

Padley, M and Hirsch, D (2013) Child Poverty Map of the UK. End Child Poverty http://www.endchildpoverty.org.uk/images/ecp/130212%20ECP%20local%20 report%20final(1).pdf [accessed 20.10.13]

Perry, C (2013) Measuring Deprivation in Education, Universal Credit and Free School Meals. Research and Information Service Research Paper NIAR 261-13 Northern Ireland Assembly.

 $\frac{http://www.niassembly.gov.uk/Documents/RaISe/Publications/2013/educations/2013/educations/2013.pdf}{[accessed 1.1.14]}$

Poppendieck, J. & JSTOR DDA 2009, Free for All: Fixing School Food in America, University of California Press.

Public Health Wales Response to Green Paper: a consultation to collect views about whether a Public Health Bill is needed in Wales (Feb 2013) http://www2.nphs.wales.nhs.uk:8080/CorporateServicesDocuments.nsf/5633c http://www2.nphs.wales.nhs.uk:8080/CorporateServicesDocuments.nsf/5633c http://www2.nphs.wales.nhs.uk:8080/CorporateServicesDocuments.nsf/5633c http://www2.nphs.wales.nhs.uk:8080/CorporateServicesDocuments.nsf/5633c http://www2.nphs.wales.nhs.uk:8080/CorporateServicesDocuments.nsf/5633c http://www2.nphs.wales.nhs.uk:8080/CorporateServicesDocuments.nsf/5633c http://www2.nphs.wales.nhs.uk:8080/CorporateServicesDocuments.nsf/5633c http://www2.nphs.uk:8080/CorporateServicesDocuments.nsf/5633c http://www.nphs.uk:8080/CorporateServicesDocuments.nsf/6633c http://www.nphs.uk:8080/CorporateServicesDocuments.nsf/6633c http://www.nphs.uk:8080/CorporateServicesDocuments.nsf/6633c http://www.nphs.uk:8080/CorporateServicesDocuments.nsf/6633c http://www.nphs.uk:8080/CorporateServicesDocuments.nsf/

Rothwell, H, Burgess, S, Townsend, N, Pimm, C, Shepherd, M and Murphy, S (2009) Review of Welsh Network of Healthy School Schemes 2007-2008. Final Report March 2009. Cardiff Institute of Society, Health and Ethics, Cardiff University

http://www.cardiff.ac.uk/socsi/resources/wp138.pdf [accessed 1.1.14]

Save the Children (2013) Child Poverty snapshots. The Local Picture in Wales http://www.savethechildren.org.uk/sites/default/files/docs/Child-Poverty-Snapshots-English.pdf [accessed 10.11.13]

School Food Trust (2013) Free School Meals: why don't all parents sign up? Literature Review. Children' Food Trust Sheffield March 2013

Social Mobility and Child Poverty Commission, *State of the Nation 2013: Social Mobility and Child Poverty in Great Britain*. 2013, The Stationery Office: London

The Children's Society (2012) Current Provision of Free School Meals in Wales https://www.childrenssociety.org.uk/sites/default/files/tcs/current-provision-of-free-school-meals-in-wales final.pdf [accessed 1.11.13]

Walesonline (2010) Welsh Tories call for review on free breakfast scheme. http://www.walesonline.co.uk/news/wales-news/welsh-tories-call-review-free-1932550 [accessed 10.11.13]

Welsh Government (2013) written statement – Summary of responses to the green paper consultation to collect views about whether a Public Health Bill is needed in Wales.

http://wales.gov.uk/about/cabinet/cabinetstatements/2013/greenpaperpublic healthbill/?lang=en [accessed 1.1.14]

Welsh Government (2013) The Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations 2013 No. 1984 (W. 194) Welsh Government Children and Families (Wales) Measure 2010 http://www.legislation.gov.uk/mwa/2010/1/contents

Welsh Government (2011) Child Poverty Strategy for Wales No. 095/2011 http://wales.gov.uk/docs/dsjlg/policy/110203newchildpovstrategy2en.pdf

Welsh Government (2010) Children and Families Wales Measure 2010 http://wales.gov.uk/topics/childrenyoungpeople/poverty/childrenandfamilies/?lang=en [accessed 1.12.13]

Welsh Government (2009) Our Healthy Future http://wales.gov.uk/docs/phhs/publications/100521healthyfutureen.pdf

Annex 1

Barriers to the Take Up of Free School Meals and Associated Downstream Policy Options

| Barrier | Cause | Policy Option | |
|-------------------------|----------------------------|---------------------------|--|
| Parents unaware their | Lack of accessible | Develop strategies with | |
| children are entitled | information on FSM | schools and local | |
| | qualifying criteria or the | authorities to actively | |
| | application process | engage with parents. | |
| | | This could be achieved | |
| | | through WNHSS | |
| Parents unable to apply | Language barriers, | Develop strategies with | |
| | literacy, health issues, | schools and local | |
| | access to IT, complicated | authorities to actively | |
| | paper work | engage with parents and | |
| | | support as necessary | |
| | | (e.g. translation) | |
| Registered children | Stigma, lack of meal | Activites to encourage | |
| chose not to eat | choice, preference for | children e.g. meal taster | |
| | crisps and sweets in | sessions for parents, | |
| | lunchboxes, perceived | strict packed lunch | |
| | quality of food, not being | policies, involving | |
| | able to sit with friends | children in menu choice, | |
| | | improving the dining | |
| | | experience, emphasising | |
| | | health benefits | |

(Compiled with information by Kitchen et al 2013 and Children's Food Trust 2013)

Annex 2
Policy Options For Reforming the Free School Meal Service for Infants In Wales

| Policy Option | Description | Advantages | Disadvantages | Cost implications |
|--|--|--|---|-------------------|
| A. No Action | Maintain current system | Status quo not achievable | Some reform will need to take place to fall in line with Universal Credit | Low |
| B. Extend FSM Eligibility using Universal Credit | Widen eligibility in line with the change to Universal Credit system. If Universal credit were to be made the threshold greater numbers of children would be eligible (London Assembly 2013) | Accessibility increased Increase uptake Simpler system could reduce administration costs Potential increase in attainment and reduction in achievement gap Reduction in health inequalities | "Cliff edge" situation whereby if a claimant exceeds a certain point, costs exceed the benefits (Perry 2013) Widening eligibility has been found to have a limited impact on improving take-up and attainment when compared to Universal FSM (Kitchen et al 2013) | Low |
| C. Extend Eligibility using Tax system | Use new eligibility criteria e.g. basic rate (20%) tax bracket to extend FSM provision | Includes 93% of the Welsh taxpayers (Bodden 2013) so dramatically increases accessibility without benefiting the wealthy Therefore increased efficiencies (costs) of school meal service Simpler system could reduce | Could be viewed as the same people being penalized (ref child benefit) As only 7% of the population could be excluded could be argued that cost of administration outweighs benefit and therefore Universal FSM is preferable. | Medium - high |

| Policy Option | Description | Advantages | Disadvantages | Cost implications |
|-------------------------------|--|---|--|-------------------|
| | | administration costs Potential increase in attainment and reduction in achievement gap Reduction in health inequalities | | |
| D. Proportionate universalism | Provide universal FSM in the most deprived local authorities as illustrated in figure 2 | Has the potential to reduce the steepness of the social gradient by acting with the scale and intensity that is proportionate to the level of disadvantage (Marmot 2010) Innovative policy that could be shared with other devolved nations and applied to other policy areas | Potential discourse with choice of Local authorities allocated universal FSM Need to consider out of school meal provision e.g school holidays Expensive in terms of initial capital costs to increase catering capabilities in school and ongoing costs of meal provision | Medium-high |
| E. Universal FSM | Free school meals free to all infant school children | Equality Accessible to all - one simple administration process with no stigma attached Increase uptake as a result of no action required by parents Potential increase in attainment and reduction in achievement gap | Expensive in terms of initial capital costs to increase catering capabilities in school and ongoing costs of meal provision Money potentially wasted on those that do not need benefit What about school holidays? Subsidises the low wage economy (Lang 2013) | High |

| Policy Option | Description | Advantages | Disadvantages | Cost implications |
|--|---|--|--|-------------------|
| | | Reduction in health inequalities Increased efficiencies of school meal service | | |
| F. Universal Credit plus downstream policy options | In addition to option B adopt downstream policy options outlined in Annex 1 | Eligibility widened and issues regarding poor take up addressed so could increase eligibility and those actually receiving FSM | Costs low but impact may be negligible as widening eligibility has been found to have a limited impact on improving take-up and attainment when compared to Universal FSM (Kitchen et al 2013) | Low |