

## **ANDREW JOLLEY - WRITTEN EVIDENCE (FDO0099)**

I am writing to highlight some concerns about the promotion of Universal free school meals and the evidence base used when looking at the benefits of this policy

Throughout the evidence sessions we've seen the advancement of the idea that Packed Lunches are bad and school meals are healthy and as a consequence it follows that universality would be a societal good. But the evidence base for these claims seems to rely on some questionable assumptions, indeed some assumptions that are contradicted by the evidence presented to the committee.

When looking at universal FSM and obesity it is always worth starting with the gold standard research into free school meals, the only research that actually measured pupils, a longitudinal pilot scheme jointly commissioned by the Departments of Health and Education to look at the impact of universal FSM.

<https://www.gov.uk/government/publications/evaluation-of-the-free-school-meals-pilot-impact-report>

In the pilot, the authors state "There was no evidence that the FSM pilot led to significant health benefits during the two year pilot period. For example, there was no evidence of any change in children's Body Mass Index."

"None of the pilot models was found to have any significant impact on the likelihood of being obese or overweight"

"For each indicator, the change over time amongst pupils in the universal and extended entitlement pilot areas can be compared with the change over time amongst pupils in their respective comparison areas. This analysis confirms the findings from the survey described above, providing little evidence that either pilot model had any significant impact on BMI or obesity levels amongst pupils of these ages"

This is primary data, the researchers measured the children "Body Mass Index was calculated using the height and weight measurements taken during the face-to-face interview"

These findings or lack of them, are described at length within the papers and it is crystal clear there were no changes in BMI due to Universal Free School Meals. Yet not one witness chose to mention these findings, despite pointing to the paper for other claims which perhaps better suited their agenda.

Throughout the sessions we've seen witnesses raising concerns about the lack of compliance with school food standards, the questionable quality of school meals, a lack of monitoring and school catering being over reliant on ultra-processed foods.

Anita Brown suggests standards aren't being met "We are working with suppliers to make sure as best we can that every item we put into schools meets food standards. Some members are struggling with the funding element of it because food prices, as we all know, have exceeded what we get funding for" that "Not every local authority can meet the standards to that level because of that food cost and the cost of living crisis that we are all in"

Naomi Duncan "The key bit is that we need to beef up, freshen up and enforce the school food standards. We are 10 years on from the School Food Plan, but the standards have never been updated"

Georgie Branch asked "thousands of secondary school students whether they think it is easy to eat healthily at their schools, and the majority say no, for reasons including the canteen layout, the queuing, the amount of time they have to eat, the cost of foods, and the availability of healthy foods and unhealthy foods in the school canteens" on standards she says "In 2016, the Government committed to updating the standards, but that remains an ongoing review" and that "The framework needs to be in place to provide accountability and ensure quality provision"

Naomi Duncan "around 64% of the calories that kids were taking in from meals provided by the school were coming from ultra-processed food, and many of those were foods that were high in fat, sugar and salt"

This tallies with what we see in the media around the poor quality of some school meals (and I could have posted hundreds of instances)

<https://www.theguardian.com/education/2024/mar/13/how-difficult-is-it-to-bake-a-potato-head-hits-out-at-school-caterers-southampton>

<https://www.theguardian.com/education/2024/mar/15/i-cant-make-them-eat-it-teachers-and-parents-share-concerns-over-school-lunches-in-england>

<https://www.theguardian.com/education/2022/jun/15/rising-costs-put-pressure-on-school-food-industry>

As well as previous evidence from the pandemic when some caterers were seem to be profiteering.

<https://www.independent.co.uk/news/uk/home-news/free-school-meals-parcels-marcus-rashford-b1785877.html>

Recent University of Northumbria research into HAFs, who were required to meet standards as a condition of their funding, found around 10% fully compliant with the standards. Research has shown over 60% of schools were ignoring the school food standards and a similar proportion contain ultra-processed foods

<https://www.foodforlife.org.uk/whats-happening/schools/news-and-blogs/ffl-blog-0000/Bite-Back-2030-Report-amplifies-young-voices-about-food-in-schools-97df7fbcc61648e588a045fe9a074691>

<https://www.theguardian.com/food/2022/jul/20/average-uk-school-meals-mostly-made-of-ultra-processed-foods>

And this isn't a new phenomenon

<https://www.theguardian.com/education/2012/may/14/academies-ignore-school-food-guidelines#:~:text=Out%20of%2099%20academies%20that,40%25%20sugar%20%E2%80%93%20in%2054.>

It might be of interest to the committee that there is nothing in the current school food standards to stop Turkey Twizzlers making a return to school menus, no restrictions on salt added to food during cooking or limits on fat or sugar content.

I hope that the committee will agree and accept that the current school food standards are not fit for purpose, they are routinely ignored. We have a majority of school meals that are high in Ultra-processed foods, there is no monitoring of quality and no primary evidence as to how healthy schools meals actually are.

To counter this, we are repeatedly referred back to the Leeds research that looked at packed lunch compliance with the Standards, this one piece of research seems to drive so much that follows, so it is worth examining what it did and didn't find.

<https://bmjopen.bmj.com/content/10/1/e029688>

The starting point should be that there are NO standards for packed lunches, there were no government guidelines on the contents of packed lunches and no guidance for schools. The 2016 research used the highly

technical standards that were aimed solely at caterers. The standards being applied were never designed to be applied to packed lunches.

To my mind it's analogous to environmental health going into people's homes, checking kitchens and describing 98% of homes as dirty, because families weren't wearing hair and beard covers and didn't have all the right coloured chopping boards.

Moreover, the 2016 research didn't use the School Food Standards that applied to schools in 2016, they used the old nutrient-based standards which were dropped as they were deemed too difficult and cumbersome to use effectively in school.

There is no comparator from the school meals being served at the time to indicate what percentage of schools would meet these old standards. Indeed, given the strictness of the previous unwieldy standards, alongside the current evidence of noncompliance with the more simple Food Standards, it's not unreasonable to assume that if the same checks were made on school food being served and the same old standards applied, the vast majority of schools food would not be compliant and we would see similar outcomes from school meals as we did from packed lunches.

<https://www.theguardian.com/education/2006/jul/14/schools.uk4>

I would argue, without evidence on how school meals would perform under the same conditions, using the same standards, it's erroneous to come to any conclusions about the comparable healthiness of packed lunches and school meals. This is no criticism of the authors, they do not make these claims, but we are in danger of unfairly comparing apples and oranges and it would be wrong to use this paper as evidence that school meals are healthy.

Unfortunately that is exactly what many people seem to do.

That's not to say the research isn't useful, one of the most interesting findings was around what children actually consumed from their packed lunches. Although children brought in food containing more calories than the RDA for lunch, they only consumed a third of those calories.

Children with packed lunches were only consuming 475 calories, a full 55 calories less than they were recommended to be eating at lunchtime.

In general, when it comes to packed lunches that they should be considered in relation to overall consumption and consumption at different times of day. It may also be worth mentioning the findings of the Ofsted research into Obesity, healthy eating and physical activity in primary schools "we saw no strong evidence in our research to suggest that

packed lunches are playing a significant role in the obesity crisis” And that “swapping this lunch for a school meal is unlikely to be a silver bullet”

Perhaps the most telling commentary was “Quite a few packed lunches had a biscuit, a chocolate bar or a piece of cake. However, 93% of pupils taking school meals told us they had a pudding. Instead, the choices leading to obesity are more likely to be happening outside of school hours”

[https://assets.publishing.service.gov.uk/media/5b4dd77ced915d437a936d54/Obesity\\_\\_healthy\\_eating\\_and\\_physical\\_activity\\_in\\_primary\\_schools\\_170718.pdf](https://assets.publishing.service.gov.uk/media/5b4dd77ced915d437a936d54/Obesity__healthy_eating_and_physical_activity_in_primary_schools_170718.pdf)

Whilst citing the Ofsted report, it is worth mentioning the issue of Take-up, given in a recent evidence session Bee Wilson, pointed to the report, suggesting Take-up of Universal free school meals was 82%. She went on to explain how that figure was disappointingly low.

Whilst all the above is technically correct and Ofsted did indeed state Take-up was 82%, they did so using the unusual measure of “*children in each school year who had school meals once a week*”

[https://assets.publishing.service.gov.uk/media/5b4dd77ced915d437a936d54/Obesity\\_\\_healthy\\_eating\\_and\\_physical\\_activity\\_in\\_primary\\_schools\\_170718.pdf](https://assets.publishing.service.gov.uk/media/5b4dd77ced915d437a936d54/Obesity__healthy_eating_and_physical_activity_in_primary_schools_170718.pdf)

This is very different from the more commonly used and understood metric whereby researchers look at number of pupils taking a meal on any one day.

I would suggest that OFSTEDs use of 82% having a meal once a week is inappropriate when it comes to any wider analysis of Take-up as it distorts the figures by including children who may well only take one in five meals and classifies them as fully participating. Children who have Fish and chips on the Friday, but bring in packed lunches for the rest of the week, should not be seen as actively engaged in the initiative.

This is no slight on Bee who actually makes a very good point, Take-up of Universal free school Meals IS low and IS disappointing and we absolutely should be doing more to look at the reasons why. Worryingly there is evidence that Take-up of Universal Infant Free School Meals is actually much lower than even she and Ofsted suggest.

Firstly we should address the Department for Education figures. In its wisdom, DfE decided to allocate UIFSM funding to schools based on the number of infants “taking a meal” on the two annual census days.

Currently, each child registered as “taking a meal” on those days means the school receives around £480, making it in every schools interest to

boost their numbers to as high as possible. Caterers know this and are happy to play their part, we see a proliferation of "Specials" and initiatives to help boost the Take-up figures on these particular days. The DfE are well aware the data is gamed, but turn a blind eye.

<https://www.tes.com/magazine/archive/millions-funding-depends-tomorrows-infant-meals>

It is very much worth noting the evidence on Take-up available from Scotland, who use a different funding mechanism that doesn't include any incentives to game the system. As recently as 2022, the Take up for universal FSM was 68%

<https://www.tes.com/magazine/news/general/free-school-meals-why-are-only-68-scottish-pupils-taking> though after some concerted effort, the figures have improved to 72%

<https://www.gov.scot/publications/school-healthy-living-survey-school-meal-uptake-and-pe-provision-statistics-2023/pages/section-1-school-meal-uptake/>

My understanding is that Wales are currently experiencing numbers in the mid 60s but they haven't released an official statistics yet

<https://www.nesta.org.uk/project-updates/testing-new-ideas-to-increase-the-uptake-of-free-school-meals-in-wales/>

Surveys from 2013/14 show take up of benefits derived FSM at 75.1% and take up of paid for meals at 35.5% (sadly this is the latest full survey available) there is other evidence from Chartwells to suggest take up is 73%, Jane Renton former chair of LACA recently quoted a figure of 70%, as did trust leaders in this recent podcast

[https://assets.publishing.service.gov.uk/media/5a7e1f50ed915d74e62243f4/RR405\\_-\\_School\\_Lunch\\_Take-up\\_Survey\\_2013\\_to\\_2014.pdf](https://assets.publishing.service.gov.uk/media/5a7e1f50ed915d74e62243f4/RR405_-_School_Lunch_Take-up_Survey_2013_to_2014.pdf)

<https://flickread.com/edition/html/65eb22ed66b83#23>

<https://x.com/TwoHeadsPod/status/1768626696544989569>

Unfortunately, because no one takes unfettered statistics in England no one is able to provide an accurate Take-up figure. It is however safe to assume that because both OFSTEDs 82% and DfEs 84% are known to be inflated, the true Take-up figure is significantly lower than either. An estimated Take-up figure of 73% would still mean England has the highest rate of the home nations and it wouldn't be too much lower than the previously recorded Take-up for those receiving benefits derived FSM.

Both Take-up and compliance with standards feeds into the other evidence being quoted as showing Universal FSM impacted obesity, namely the University of Essex paper of 2020.

[https://www.iser.essex.ac.uk/wp-content/uploads/files/misoc/reports/Impact\\_of\\_the\\_Universal\\_Infant\\_Free\\_School\\_Meal\\_policy.pdf](https://www.iser.essex.ac.uk/wp-content/uploads/files/misoc/reports/Impact_of_the_Universal_Infant_Free_School_Meal_policy.pdf)

Researchers were unable to perform a conventional tests using parallel trends between a treated and control group in the pre-treatment period because of the big bang introduction of UIFSM, so they came up with a novel method to “exploit the fact that the NCMP measures children throughout the school year, and that if UIFSM alters children’s dietary intake we should expect a dose-response relationship.” In simple terms they looked at the weights of pupils in the first year of Universal Infant Free School meals, analysed the difference between those taken at the beginning of the year and those towards the end. And they found a small decrease in obesity rates over that year. They then attributed all this tiny change to the introduction of the UIFSM policy.

And that’s a problem because at exactly the same time, we saw the publication of the School food plan, the new School Food Standards imposed on schools in a blaze of publicity, schools were being directed by DfE to consider the healthiness of their food offer and we also saw the introduction of the primary PE grant to encourage more children to be healthy and do more exercise (the PE grant was deemed such a success that two years later the funding was doubled and the policy extended). Central government invested £183million in school meals infrastructure, small schools received an extra £3000 each to support their kitchens. Specialist advisors were sent into schools and we saw significant extra publicity around healthy eating, indeed there was a time when Henry Dimbleby appeared in the media almost daily.

All of these seem highly likely to have played some role in changes to the bodyweight outcomes. All things were very much not equal to the years used as comparisons. It therefore seems unreasonable to attribute so much of the impact to the introduction of Universal Free school meals.

I put this point to researchers, who amended the draft to include a factor for additional interventions. It was never explained how the additional factor was worked out, nor how the impact was calculated, and fortunately for the authors this additional factor didn’t appear to make any difference to their outcomes.

It's my view we should all be sceptical of anyone suggesting we can discount other factors and assume Universality alone that is causing these relatively small changes.

There is a second issue with this research around the counterfactual, the basic assumptions used when assessing if school meals are impactful

"The content of packed lunches, being the counterfactual to school meal consumption for those induced to switch by the UIFSM policy, are an important determinant of the effect of UIFSM on bodyweight outcomes. While a school lunch complying with the standards should average 530 calories per day, the audit study by Evans et al. (2018) found 89% of packed lunches to exceed this level, averaging 624 calories, and only 1% of packed lunches meeting food school standards in terms of energy and nutrients. Our prior expectation is therefore that, other things equal, we would expect a reduction in children's bodyweight outcomes as a result of the UIFSM policy. In particular, we expect the impact of UIFSM to depend on the 'dose' of free meals received, so that a greater effect should be observed for children at the end of the first year in school (after up to 190 meals) than for children just starting school for the first time."

This counterfactual contains a number of inaccurate assumptions, including repetition of the sensationalist 89% (sic) packed lunch claim and they use the Leeds paper to suggest a direct link between the calorific contents of a packed lunch and obesity.

Only as highlighted previously, the research they quote looks at what is actually consumed from the packed lunches, they found children only consumed 475 calories which is 55 calories less than the recommended number of calories for a lunchtime.

I am not a nutritionist, but I struggle to believe a relatively small percentage of pupils consuming LESS calories than the Recommended Daily Allowance will cause a statistically significant reduction in obesity.

Given both the external factors and issues with the counterfactual, I can't see how we can properly assess that the introduction of Universal Infant Free School meals is the causal factor for the changes in BMI, not least because as the authors state, "Most of the existing evidence on the effect of free school lunches on bodyweight outcomes suggests that these raise the prevalence of obesity"

As it was given so much prominence by some of the witnesses, I want to go through the Cost benefit analysis commissioned by Impact on Urban Health (an offshoot of the Guys and St Thomas's foundation) and produced by PWC. Whilst it is no doubt well written and the production



values are fantastic, when it comes to their evaluation of Universal Free School meals, every single assumption in both costs and benefits is wrong! Moreover, wrong in a way that exaggerates the figures to make UFSM sound more appealing.

I would point to page 7 of the technical appendix where all the assumptions used in the cost benefit analysis are listed

<https://urbanhealth.org.uk/wp-content/uploads/2022/10/FSM-Report-Technical-Appendix-1.pdf>

Throughout the report they erroneously assume that take up is 85% "For the Universal Free School Meals scenario, the median take-up rate estimate of 85% was used to form the basis of the results. For the sensitivity analysis, the results were compared with a higher take-up rate of 90%. These figures are based on the Universal infant FSM take-up rates."

It's important to recognise that the higher the take up, the more pupils can be claimed as being treated by any Universal FSM intervention and the higher the perceived benefits. We currently have 24% of pupils on FSM, take up of paid for meals was approximately 35% and around 27% not taking a meal.

It is misleading to use a Take-up figure of 85%.

On the Cost of meals provision "Assumes the cost of funding FSM remains static overtime and is at a constant price-base year of 2022 and assumes the cost of meal provision for the Universal Free School Meals scenario to be relatively lower than for the Universal Credit scenario, to account for the economies of scale from a larger production of meal provision"

"For the Universal Free School Meals scenario, the Government's daily cost of meal provision of £2.41 per child was used to derive an annual cost of £458"

Whilst the £2.41 figure was the correct grant payment made at the time (now £2.53) it is naïve in the extreme to assume this is the daily cost.

The committee heard from LACA that funding isn't sufficient to cover a schools costs and it was exactly the same when this analysis was done. Many schools are subsidising the provision of Free School meals from their teaching and learning budgets. There are schools receiving £2.53 but paying out over £4 per meal to a caterer, plus carrying the cost of electricity, gas, water, waste removal, extra staff and the cost of replacing equipment. In Newham, their award winning council run caterers now charge schools £3 because they made a £1.8million loss last

year. All of these additional costs above the amount funded via the grant, will end up being borne by schools (and ultimately the Government)

<https://schoolsweek.co.uk/free-infant-meals-unsustainable-at-flagship-school/>

<https://schoolsweek.co.uk/dfc-axes-universal-infant-free-school-meals-support-grant/>

<https://schoolsweek.co.uk/infant-free-school-meals-funding-rises-by-5-but-still-falls-short/>

Just because that's how much the Government pay out as a grant, it doesn't mean that is the actual cost and it is highly misleading to choose a figure of £2.41 and then project it forward.

There is little evidence that significant economies of scale can be derived, particularly in small schools. They suffer significantly from the inadequate funding methodology as evidenced by the necessity for the Small school grant when UIFSM was introduced and the subsequent harm done to small schools when it was scrapped. The school catering market is dominated by a small number of multinationals who use their dominant position to drive up profits rather than cut prices.

On Capital expenditure "An annual CapEx estimate for Primary schools of £26.6m and for Secondary schools an estimate of £5.5m were used"

These figures are totally unrealistic and the authors cherry pick the lowest figures possible rather than look at what was spent on UIFSM or by other UK countries implementing universal FSM.

It is a concern that these figures were the first port of call for witnesses when asked about the capital costs involved in providing universal FSM, it isn't primary evidence, it isn't new academic research and PWC just cherry pick from an old paper.

When looking at a capital cost, PWC quoted only the 2011 pilot report, which laid out a number of caveats around their estimates; "Unfortunately, the information provided is not comprehensive enough to be able to robustly estimate the fixed costs of the pilot, both because information is not available for each category of expenditure in every pilot authority and because it is not clear to what extent this expenditure would have occurred in the absence of the pilot. The information provided in this section should thus be taken as indicative only" also "it is highly

likely that facilities, and thus the fixed costs associated with improving those facilities, vary dramatically across authorities; thus these costs should be treated with caution and regarded as indicative only”

PWC could have looked at more recent experiences in Wales and Scotland, they could also have quoted the £173 million spent on UIFSM, which incidentally was still nowhere near enough and left many schools without funding. But they chose instead to use the lowest figure possible. It is frankly ridiculous to suggest the figures used here are in any way accurate. In the pilot itself, Durham spent an average of £20,000 per school during the pilot.

[https://assets.publishing.service.gov.uk/media/5a817a57e5274a2e87dbd86/UIFSM\\_capital\\_allocations\\_July\\_140715.pdf](https://assets.publishing.service.gov.uk/media/5a817a57e5274a2e87dbd86/UIFSM_capital_allocations_July_140715.pdf)

<https://www.telegraph.co.uk/education/educationnews/10920117/Schools-struggling-to-prepare-for-Cleggs-free-meals-plan.html>

<https://www.theguardian.com/education/2014/may/20/free-school-meals-56k-give-children-sandwich>

<https://www.dailyrecord.co.uk/news/politics/free-school-meals-scots-primary-30322333>

Building and equipment costs have risen dramatically since then. Schools are already overstretched providing Infant FSM, the prospect of setting up a new kitchen for £2500 is just laughable.

I am at a loss why expert witnesses would point to this particular report as evidence on CapEx.

On the Benefits, the report suggests Universal FSM would lead to “increased cost savings to schools reduce absenteeism and cut staff costs” that’s “The annual cost saving from reduced absenteeism is based on cost savings from education support staff needed for each school phase. The annual cost savings were multiplied with the take-up estimate for eligible children”

I am genuinely confused as to how this is considered a saving to anyone with even a basic understanding of how schools and their staffing structures work. Even if there was a significant causal relationship between universal FSM and absenteeism (which there isn't) there are no staff cost savings to be made by having more children in, to then multiply by Take-up is frankly bizarre.

The claims about UFSM and absenteeism were always spurious, but recent research clarified matters once and for all.

“The availability of UFSM did not materially affect children’s absences from school, either in terms of days missed (overall or for illness or medical appointment) or longer term engagement (share of children who are ‘persistent absentees’)”

<https://www.iser.essex.ac.uk/wp-content/uploads/files/misoc/reports/Impact-of-the-UFSM-schemes-in-England.pdf> Pg 4

Then the report implies a causal factor that is unevidenced and unsupportable, it completely misunderstands how GCSEs work and makes sweeping claims in order to derive the increased lifetime earnings.

It should be a red flag to everyone reading that they assume a child needs just 1 year on FSM to accrue the lifetime benefits “the average marginal lifetime benefit of achieving 5+ GCSEs was multiplied with the number of eligible 15-year old children that take up meals at the time of successfully completing their GCSEs” there has never been evidence that any gains persist.

Not only were the educational gains unsupported at the time, but recent research shows NO statistically significant improvements in attainment from Universal FSM.

<https://www.iser.essex.ac.uk/wp-content/uploads/files/misoc/reports/Impact-of-the-UFSM-schemes-in-England.pdf> Table 6

Pg 13 (worth noting that there is only one figure above 5% and that indicates children are significantly worse at maths after 3 years of free meals)

To suggest that simply giving a free school meal will increase the number of pupils with 5 GCSEs contradicts everything we know about achievement of FSM pupils.

Universal free school meals alone do not significantly improve attainment. They will not result in more children receiving 5 GCSEs and will not increase lifetime earnings.

The report then mentions savings to families. This is essentially a cash transfer from the exchequer to parents, but these benefits are highly regressive with only families not eligible for FSM because of their welfare status receiving the benefit, meaning the majority of beneficiaries are middle and high earners.

PWC then make assertions about increased NHS savings as a result of childhood obesity. Again they use inaccurate take up and dubious assumptions about continued impact on obesity based on the tiny changes seen in reception. It was never shown that these changes in BMI would continue or be cumulative and again more recent research has shown the impact to be both marginal and questionable.

“To estimate the childhood obesity cost saving per child, the NHS spending on treating childhood obesity was divided by the forecasted number of eligible children that take-up the meals who would be less likely to be obese.”

This is little more than supposition and there is no evidence that free school meals on their own would reduce obesity rates in the long term. Again it is worth looking at those children who receive Free School meals, they are amongst the poorest, and least qualified, most obese members of society. The free meal hasn't had any of the impact promoted by this report, because Poverty is much more impactful than simply giving a free school lunch.

I can't stress enough, not one of the impactful assumptions used to calculate the costs or benefits can be defended as accurate.

<https://urbanhealth.org.uk/wp-content/uploads/2022/10/FSM-Report-Technical-Appendix-1.pdf>

But still witnesses promoted the Impact for Urban Health report as a reliable source. moreover it was notable that when witnesses were asked by The Earl of Caithness and Lord Krebs about the capital costs involved in providing universal FSM, rather than pointing to freely available primary data Naomi Duncan's first port of call was the Impact on Urban health report.

This report should never receive such prominence, given it isn't new research and just regurgitates old papers.

I fear there is a lack of inquisition when it comes to the Impact on Urban health report, where people know there are questionable assumptions, but when the outcome suits their agenda nothing is said. It may be incidental, but it is worth remembering that Guys and St Thomas's who run the Impact for Urban Health charity (witness Nikita Sinclair), also provide significant funding for Chefs in Schools (witness Naomi Duncan whose founder is previous witness Henry Dimbleby) and are the single highest donors for School Food Matters (witness Georgie Branch), as well as giving over £200,000 to the Food Foundation (founder Baroness Boycott).

As mentioned there is some new research from University of Essex

<https://www.iser.essex.ac.uk/wp-content/uploads/files/misoc/reports/Impact-of-the-UFSM-schemes-in-England.pdf>

It looked at the 4 LAs that instigated FSM for primary pupils, so they were better able to run parallel impact assessments. Again whilst some is interesting, the methodology and assumptions are sometimes dubious.

Given "The London Effect" on attainment is significant, it is right and proper that at when comparing pupil achievement, these four London boroughs are pitched against other London schools.

But when it comes to assessing BMI, to equate the four poorest councils in London to the rest of London excluding these four, seems an odd decision, particularly as the committee have heard how impactful poverty can be when looking at obesity rates.

There are many other deprived LAs that would provide much better basket of comparators and the decision to use "the rest of London" is not a sensible one.

Again they look at reception at a time when the policy is introduced, when there is significant publicity and children are settling in school. It's not a surprise that there is some significant variance during the time children are bedding into reception. The findings of any impact in year six are marginal, even though the choice of comparator is IMO dubious.

There are other incidental papers, but very few are UK based and have relevance to the systems in place in the UK. Some research has tiny sample size where 60 odd teachers' opinions give their views others like Post war Sweden try to align mass changes to diet after WW2 with modern British systems with 24% receiving FSM. There was also some research that looked at the amount of Ultra processed food in packed lunches and in school meals. Again whilst interesting it didn't look at what was consumed nor at what part the meals played in overall daily consumption. My reading is that the fact bread is considered a UPF immediately distorts figures, because many packed lunches contain sandwiches. It should also be remembered that under the food standards schools must make bread available every day. I know the committee are looking at UPF, but until there is a proper understanding of what is a healthy school lunch and what isn't, the simple "contains UPF shouldn't be used as an indicative of having long term health benefits.

The lack of monitoring was rightly brought up by numerous witnesses. Someone once said "what gets measured gets done" so it is perhaps unsurprising that we see so much poor quality food being served. It is worth highlighting again that the perception from researchers is very different from the reality on the ground. No one should expect school food to improve health and attainment unless it is healthy and nutritious. That being said, the idea that OFSTED are the best way forward to monitor school food is misplaced and misguided.

The coalition government promised monitoring inspections when they introduced the School food standards but soon abandoned those plans. Since then, a number of school food "experts" have tried to link the Ofsted inspectorate to a food inspectorate without understanding the role of Ofsted. It's just been seen as a cheap way to shoehorn some level of monitoring without all the extra costs of a new specific organisation.

The basic flaw being Ofsted are NOT food inspectors and have repeatedly said they don't want to be, It would divert highly qualified and trained Ofsted inspectors to have them check on kitchens, the content and the tractability of food. It's also worth noting inspections are run on an incredibly packed timetable, but also are fairly irregularly, with some schools not having had a full visit for a decade.

But the biggest issue is the current Food standards are not fit for purpose & are being reviewed. Would we want to see an otherwise outstanding school downgraded for an issue of noncompliance with what everyone agrees are questionable standards? Worse still any failure might be down to a third party catering company that is imposed on the school.

If they are to be outside the formal part of the inspection process, then what's the point?

<https://www.theguardian.com/education/2022/feb/01/food-agency-to-check-school-lunches-in-england-meet-standards>

We need desperately need school food monitoring, but not via Ofsted.

As they were mentioned in relation to Universal FSM, I want to quickly address the issues of Stigma and Attendance.

The new research highlights that there was no change in attendance under universal FSM. Which would seem logical, given the food on offer is hardly going to incentivise a child who is otherwise well fed to come into school when they previously wouldn't attend.

Stigma is regularly highlighted, but all too often in an historical context, people reminiscing about how school lunches were when they were in

school. Nowadays most schools use cashless systems such as biometrics, wristbands or fingerprints and go out of their way so as not to identify FSM pupils. There are the rare cases where schools aren't as proactive as they could be, but these are generally addressed by fairly simple organisational changes. So for instance, if a child doesn't have enough credit to eat the same meal as their peers, the school can and should use some of the PP funding to increase the credit (ideally central government would pay more). If the brown paper bags on school trips are an issue, ask the caterers to use different containers. There are plenty of examples of good practice that ensure FSM pupils are never stigmatised.

And I just want to be clear, schools no longer sit FSM pupils on different tables or make them carry different colour tickets, that hasn't happened for years. Those perpetuating these myths are simply scaremongering.

That's not to say those in poverty, the families on low incomes, who face all the issues around poverty wouldn't benefit, but there are better ways to target support, not least because the need for FSM is likely to be only one of numerous issues they face.

Free School meals are not a silver bullet. If they were we would see increased attainment and better health outcomes from those children who receive FSM, rather than the reality of them being amongst the most obese and worst performing pupils.

And perhaps that is the key issue. There are children whose lives are dominated by the stark realities of poverty. They are more likely to see adverts for unhealthy food, more likely to consume unhealthy food, live unhealthy lifestyles compared to their better off peers. And currently because of the £7400 UC cut off, we do not support and feed all the children on low incomes who need our help. There are around 900,000 children considered living in poverty who don't receive FSM, the best thing we could do is support those children by providing a healthy school meal to everyone claiming Universal Credit.

The evidence base for universal FSM is incredibly weak and there is considerable confirmation bias from the supporters of universality. No one has come up with a reasoned mechanism by which the majority of pupils who are not actually in poverty would benefit from Universal Free School Meals.

Ultimately you don't help families out of poverty by spending billions on feeding the children of middle and high earners.



My recommendations;

Expand FSM eligibility to everyone claiming UC, (including during the 5 week wait for the claim)

Increase the amount schools receive so they don't have to subsidise FSM from teaching budgets

Automatic registration, so everyone eligible actually receives a meal

Properly funded breakfast & holiday support

Community Eligibility so everyone attending a school in a deprived area gets a free meal

New School Food Standards

New independent school food monitoring

New guidelines for packed lunches

<https://x.com/ajjolley/status/1579539754450038784>

*7 April 2024*