



## Children's Wellbeing and Schools Bill: call for evidence submission

January 2025

### Executive summary

- a. **Free school meals for all:** It is crucial that every child has access to a hot, healthy lunch, free from the stigma of means-testing. The government should build on its breakfast club policy and introduce universal free school meals across the school day as part of The Children's Wellbeing and Schools Bill, starting with an immediate extension of benefits to the children most in need of healthy school meals.
- b. **Auto-enrolment:** At least 250,000 eligible children are not registered for free school meals due to complex paperwork and stigma. The Children's Wellbeing and Schools Bill should mandate an auto-enrolment system to ensure that all eligible children receive the benefits they are entitled to.
- c. **School food standards:** Current school food standards, developed over a decade ago, must be reviewed, updated and monitored, and they must apply throughout the entire school day. The Children's Wellbeing and Schools Bill should ensure an effective accountability mechanism around school food, including mandatory reporting and quality assurance.

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### About School Food Matters

School Food Matters mission is two-fold: to teach children about food and to improve children's access to healthy, sustainable food during their time at school. To do this, we provide fully funded food education programmes to schools across England. Our experience delivering these programmes informs and strengthens our campaigns, bringing the voices of children, parents and teachers to government policy.

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#### (1) Free school meals for all

(1.1) Too many children are missing out on what can be their only hot meal of the day. Despite dramatic increases in the cost of living, the threshold for eligibility for benefit-related school meals (total net income of £7,400 after tax, before benefits in England) has not been increased since its introduction in 2018. This has left an [estimated 900,000 school-aged children classified as 'living in poverty' in England](#) without access to free school meals.

(1.2) Introducing Universal free school meals would alleviate pressures on local authorities, schools, and community services, which currently step up to fill the gaps in the absence of a national policy. [Our polling of 10,000 teachers](#) found that schools across England are regularly drawing on their over-stretched budgets and staff to ensure no child goes hungry. Further research found that schools were going to extreme lengths to provide school meals for children. One school reported establishing a low-cost after-school programme to help fund free school meals for children who were not eligible under the low-income threshold.



(1.3) Free school meals are good for the economy. [A study by PWC for Impact on Urban Health](#) modelled scenarios for expanding free school meals. The report estimated that the expansion of free school meals to all children from families in receipt of Universal Credit would generate £1.38 in the core benefits for every £1 invested. The report also estimates that the expansion of free school meals for all children regardless of Universal Credit status would generate £1.71 in the core benefits for every £1 invested. This plan would deliver a combined core and wider benefit totalling £99.5bn. The core benefits in both scenarios are made up of cost savings to schools, increased lifetime earnings and contributions, increased NHS savings (due to reduced child obesity) and savings on food costs for families.

(1.4) Providing school meals can lead to improved health and diet outcomes. For example, [research from a free school meals pilot scheme](#) revealed a shift away from eating foods associated with packed lunches, fewer [than 2% of which](#) meet the nutritional standards required of school food. The research also showed a significant increase in attainment, with children achieving between four and eight weeks' more progress in maths and English. [Further research suggests](#) this is because students are better equipped to absorb material presented in school after eating a nutritious lunch.

- a. Therefore, we recommend that The Children's Wellbeing and Schools Bill **include universal free school meals for all** to break down barriers to opportunity and allow children to thrive at school. Key actions include:
  - i. Commit to a longer-term ambition to implement universal provision to all pupils, starting with immediate steps to address those most in need.
  - ii. The Department for Education should investigate ways to fund an expanded free school meal offer via a direct grant, to negate impact on pupil premium funding.
  - iii. Establish a Free School Meals Implementation Expert Panel to advise Department for Education on successful expansion in schools, with representatives from schools, councils and caterers who have relevant experience.

## (2) Auto-enrolment

(2.1) Schools and local authorities work hard to identify and register children who are entitled to free school meals. However, despite best efforts, many children are still missing out. Reasons for this gap include but are not limited [to stigma and parental/carers concerns about schools asking for sensitive benefits data](#). It is estimated at least 250,000 entitled children are missing out on the benefits of the policy and schools are missing out on the pupil premium funding used to support the learning of children (£1,480 for primary, £1,050 for secondary). [More recent research](#) suggests the number of children missing out could be far greater, impacting as many as 471,000.

(2.2) [Results from pilots in local authorities](#) show that introducing automatic enrolment can be effective in identifying non-registered children, with a disproportionate benefit to children from ethnic minorities, lone-parent families and with English as a second language. In Lambeth, 89% of pupils newly registered for free school meals came from lone parent households, 59% came from households with English as an Additional Language and 79% were from Black, Asian and Multi-Ethnic backgrounds (compared to 66% of the school population).



(2.3) Auto-enrolment has been successfully implemented in other policy areas, including workplace pension threshold-based inclusions which increased participation from [55% in 2012](#), to [88% by 2021](#). Auto-enrolment is a crucial and immediate step in reducing and alleviating the impacts of child poverty. There are limitations to what a local approach can achieve due to the significant time resource needed and complexities of data sets, meaning many pupils will still miss out. Introducing auto-enrolment nationally will remove administrative barriers and ensure that all children can access their legal entitlement without placing additional burdens on families already facing challenges.

- a. Therefore, we recommend that the government **take immediate action to implement a national auto-enrolment system** as part of The Children's Wellbeing and Schools Bill to ensure that all eligible children are automatically registered and can access free school meals they're legally entitled to. Key actions include:
  - i. Establish a working group of officials from DWP, DfE and HMT, together with funding specialists from education bodies to develop a plan for delivering automatic registration. This group should also establish a clear timeline and process for introducing auto-enrolment by the end of 2025.
  - ii. Commission an up-to-date FSM Restriction dataset on free school meal registration rates to accurately assess under-registration rates.
  - iii. Consider learnings and best practices from pilot programmes introduced in Local Authorities to identify challenges and work toward an effective and equitable system.

### (3) School food standards

(3.1) As of 2022, only [25% of state schools in England subscribed to a quality assurance mechanism](#), meaning that we are unaware of what is being served in a large proportion of schools. And many school food meals being served [are not compliant with the statutory School Food Standards](#). Local authority officers have a better understanding of schools in their area and can more nimbly and effectively support them to improve the food on offer.

(3.2) In 2024, the Food Standards Agency published its [final school food standards compliance report](#) aimed at testing the pilot's design, exploring the practicalities of Food Safety Officers checking school food standards and hygiene. The pilot found that the process worked well and [identified several recommendations for improvement](#).

(3.3) The Food Standards Agency's School Food Standards Compliance Pilot echoes our [Healthy Zones](#) programme in Southwark and Tower Hamlets, both local authorities with dedicated school food leads. Our independent evaluation shows that the strong foundations laid by local leads have supported wider and deeper engagement within schools looking to improve their food culture.

- a. Therefore, we recommend that the government **commit to reviewing, updating and monitoring the school food standards** as part of The Children's Wellbeing and Schools Bill. Key actions include:
  - i. Implement recommendations from the Food Standards Agency pilot in the financial year 25/26 with a five-year plan for continued implementation and monitoring mechanisms.



- ii. Require schools to appoint a lead Governor or Trustee with responsibility for school food (and promote the recent NGA Whole School Approach to Food [training module](#)).
- iii. Require schools to publish a school food policy and then report on their school food activities (using a standardised DfE managed template): including take-up rates, funding allocations and how schools are meeting school food standards, as part of a whole school food approach.