

How do free school meal registration practices differ across place and time?

Research with local authorities and schools



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with Dr Tammy Campbell

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For publications, see: <https://www.researchgate.net/profile/Tammy-Campbell-2>

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Executive summary

This research explores how and why free school meals (FSM) and free early years meals (FEYM) registration practices vary across time and place. This is important because registration processes can have an impact on levels of FSM and FEYM registration and therefore who is identified as ‘disadvantaged’ and gains access to free meals and associated benefits. This research is part of a wider project which explores [FSM as a measure of disadvantage](#).

At the time of this research FSM registration practices have been particularly topical. [The Education Committee](#) has recommended that FSM auto-enrolment is introduced as part of the Children’s Wellbeing and Schools Bill. Transitional protection for FSM was planned to come to an end in March 2025, meaning new applicants to FSM would no longer remain eligible until the end of their phase of education if they did not continue to meet the eligibility criteria. However, as this report was being prepared for publication, in June 2025, the Department for Education announced that protections would now continue until summer 2026, and that from September 2026, all children in families claiming Universal Credit will be entitled to FSM. The Eligibility Checking System is also [being updated](#) and a [new child poverty strategy](#) is due to be published.

The findings outlined below are based on surveys and interviews with local authorities (LAs) and multi-academy trusts (MATs), as well as a freedom of information request to the Department for Education. The empirical work took place in 2024 and early 2025, before the government’s decision to extend FSM eligibility and transitional protections. Whilst the extension of FSM eligibility is welcome and in-line with these findings, the research reveals there is much more to be done to ensure that all children who are entitled to FSM and FEYM can actually access them, including the youngest children who are at greatest risk of poverty.

Main findings

1. Local authorities and schools invest in a range of approaches to maximise FSM registration, though there is still variation in FSM registration practices

Depending on which school and LA a child is in different levels of effort are required by their parents/carers to register for FSM. This ranges from proactively making direct applications with the LA, to schools collecting the required information from all parents/carers en masse for FSM checks, to data-matching auto-enrolment processes where the required information to check FSM entitlement is identified without the need for parents/carers to share information. In some schools and LAs a parent/carer only needs to apply once and, if ineligible, their details are periodically re-checked to capture any changes in eligibility; other LAs do not re-check applications but instead require parents/carers to apply again each time their circumstances change. Additional benefits and incentives for parents/carers to apply for FSM also differ across areas, with some LAs continuing to provide vouchers for food during school holidays. Some schools also provide incentives for parents/carers to apply for FSM regardless of whether they are likely to be entitled as a way to maximise FSM registration. These differences in registration practices are important because they are likely to lead to differences in levels of registration.

2. Changes over time have influenced FSM registration practices

Significant events and policy changes have impacted how LAs and schools approach FSM registration. The introduction of universal infant free school meals (UIFSM) reduced the incentive for parents/carers to apply for FSM but led to increased efforts from LAs and schools to maximise registration. The Covid-19 pandemic raised awareness and need for FSM and, in combination with Universal Credit transitional protections has led to a continued higher number of FSM registered children. The introduction of Universal Credit and the associated changes to FSM eligibility criteria has made the FSM eligibility checking process more complex. As technology has improved and incentives have changed, LAs have honed their approach over time to attempt to increase FSM registration rates.

3. Despite increased efforts to maximise registration there are still barriers for parents/carers applying for FSM

For parents/carers with English as an additional language applying for FSM is more difficult and LAs and schools engage in outreach to counter these difficulties, by raising awareness and supporting applications, including translating documents and applying on parents/carers' behalf. There is still a stigma of FSM for some parents/carers which makes them reluctant to apply and requires sensitivity in how FSM is promoted. Lack of digital access or IT skills can be prohibitive for some parents/carers, depending on the available registration processes. Families with no recourse to public funds (NRPF) have a different set of eligibility criteria and a different application process. In addition to potential lack of awareness and language barriers, families with NRPF can be reluctant to share their details for FSM registration out of fear it might affect their case for asylum or citizenship. Some LAs commented that many of these barriers could be overcome by auto-enrolment.

4. Where LAs are already implementing local auto-enrolment this is usually resource-intensive and does not replace existing approaches to FSM registration

Although local auto-enrolment can be automatic from the perspective of parents/carers, for LAs it requires updating periodically to capture changes in parents/carers circumstances. Setting up local auto-enrolment often requires significant investment of resource, with input from staff across multiple teams, legal considerations related to data protection and potentially practical difficulties with data matching. The challenges of auto-enrolment are greater for some LAs than others depending on their characteristics and available funding. It does not replace existing practices - where local auto-enrolment has been implemented this is in addition to rather than replacing other routes to FSM registration. There are still complications which are difficult to address with auto-enrolment at the local level - for example when a child attends a school in a different LA to where they live, or when LAs are unable to access data for schools that have opted out of their FSM checking services. Many LAs called for a national approach to auto-enrolment which would overcome certain obstacles, remove the need for significant investment of resources and remove inequalities between LAs in terms of their capacity to implement auto-enrolment.

5. Some nursery children do not have access to the free meals they are entitled to

Children who meet the FSM eligibility criteria and attend maintained nursery settings before and after lunch are entitled to free meals. However, some LAs interpreted this policy as optional rather than a statutory obligation and some did not believe nursery children could be entitled to free meals. Some settings did not provide free meals for eligible children due to lack of kitchen facilities. By contrast in other LAs free early years meals (FEYM) were included in local auto-enrolment processes and promoted to parents before even registering at a maintained nursery. During transitional protections children registered for FEYM should have their free meals protected until the end of primary school, though not all LAs were aware of this. Where entitled children are not registered for FEYM this is a missed opportunity for identifying disadvantaged pre-school children, as some LAs use free meals registration to direct other resources for low-income families.

6. The current low income threshold makes FSM less meaningful as a measure of disadvantage

Schools and LAs spoke of families who were struggling financially and would benefit from FSM but did not meet the eligibility criteria due to the very low income threshold (£7,400) in place at the time of the research. At the same time there were families whose circumstances had now improved and were in a better position than those who were struggling though not eligible, but who remained eligible for FSM due to transitional protections. Some schools described identifying disadvantage based on need that they could see, and where possible used discretion to provide free meals or additional support regardless of FSM registration, though this had to be funded somehow. Nevertheless, FSM remains an important indicator of disadvantage that can confer many additional benefits. LAs described using FSM to identify families for whom they would prioritise directing additional resources to reduce disadvantage. The issue of how we identify disadvantaged children and young people has significant implications for holding government to account on their experiences within and outside of education, so it is imperative that we find a solution. EPI plans to continue to investigate potential solutions over the coming year, taking account of the newly-announced and welcome policy that all children in families claiming Universal Credit will be FSM-entitled from September 2026.

Policy recommendations

1. Introduce a national system of auto-enrolment

This would address many of the barriers to FSM and FEYM registration and reduce the inequalities in access to free meals and additional benefits across LAs and schools. A national approach to auto-enrolment would save considerable resource required by LAs to implement it as well as the significant investment from schools and LAs in their other activities to promote FSM and maximise registration. In the context of constrained budgets for both LAs and schools, this would free up essential resource that could be directed elsewhere to address other significant priorities. A centralised approach would also overcome practical challenges at the LA level, such as children attending school in a different LA to where they live. We can expect significant gains from a

centralised auto-enrolment approach in terms of increasing the uptake of FSM and the related benefits for pupils and schools, including through pupil premium funding – where local auto-enrolment has been implemented already by LAs some have discovered large numbers of previously unregistered children. There is therefore a strong social justice case to be made for national auto-enrolment – if the government already holds the data which identifies many of the children who are eligible for FSM, then they should make FSM available to them.

2. Clarify the free early years meals policy and support nurseries to provide it for all children who meet FSM eligibility criteria

The free early years meals (FEYM) policy is already narrowly targeted, including maintained nursery settings only, yet even within maintained nursery settings children entitled to FEYM do not always have access either due to lack of awareness of the policy, or the inability of settings to be able to provide the meals. The additional criteria of the child having to attend before and after lunch complicates FSM eligibility checking processes, including with auto-enrolment, and may be a reason why early years is not always included in LAs' main efforts and approaches to FSM registration. Removing this additional criteria would make it easier to register children for FEYM and identify disadvantaged children before they start school.

For this to be a meaningful policy that provides a meal and potentially other benefits to disadvantaged pre-school children there needs to be clarity for LAs that this is a statutory obligation rather than an optional service. Settings need support to provide the meals in cases where, for example, they do not have kitchen facilities.

Government should provide funding for settings to offer the meals, otherwise the associated increase in children eligible for FEYM will add more financial pressure to the already challenging situation settings are operating within.

FEYM should be included within the centralised auto-enrolment we recommend above. Additionally, all children who meet FSM criteria should have access to a free meal regardless of the type of setting they attend. Given the upcoming expansion of FSM entitlement this means expansion of FEYM to all children attending early education whose family is in receipt of Universal Credit. Otherwise, the youngest children, who are at highest risk of poverty, will not benefit from the recent expansion in FSM eligibility. Again, expansion of the entitlement must be accompanied by funding to enable settings to provide the meals.

Introduction

Background

This report is part of a wider programme of research exploring free school meals (FSM) as a measure of disadvantage.¹ Other outputs from this programme include an evidence review on FSM as a measure and its uses, including a discussion of changes in FSM eligibility and related policies over time; and quantitative analysis examining who has been registered for FSM and how characteristics of this group has changed over time.² The findings from both reports highlight that there is not a straightforward relationship between who is in income poverty, who is entitled to FSM and who is registered for FSM, with variations over time as well as across different places. There are many possible reasons for this gap in poverty, entitlement and registration, including variations in local approaches to FSM registration. The focus of this report is therefore to understand more about the process of FSM registration – how policy is implemented in practice, and whether and why practices vary across time and place. This is important for our overarching objective to understand what FSM registration measures and how useful it is as a measure of disadvantage. As we have documented in other outputs, FSM is widely used in research, to inform policy decisions about targeting resources, to evaluate the impact of policies on addressing educational inequalities and closing the education attainment gap. If FSM registration practices differ across time and place in a way that may influence FSM take-up, this has significant implications for how accurate FSM is as an indicator of disadvantage, as well as whether students who are entitled to FSM have access to FSM and any additional benefits for both their families and schools.

Therefore, the main question this research seeks to answer is: how and why do FSM registration practices vary across time and place? Again, this is important because, as articulated in our evidence review, we would expect differences in registration practices to impact levels of FSM registration, and therefore to influence the number of children identified as disadvantaged through the FSM measure, as well as the number of children receiving access to FSM and associated benefits.³ Given the recent government announcement that all children in families claiming Universal Credit (UC) will be eligible to register for FSM from September 2026,

¹ Nuffield Foundation research project ‘What has ‘Free School Meals’ measured and what are the implications?’ <https://www.nuffieldfoundation.org/project/what-has-free-school-meals-measured>

² Campbell and Cooper (2024) ‘What’s Cooking? A review of evidence and discussion on the Free School Meals (FSM) measure in the National Pupil Database’ <https://epi.org.uk/publications-and-research/whats-cooking-a-review-of-evidence-and-discussion-on-the-free-school-meals-fsm-measure-in-the-national-pupil-database/>; Campbell (2025) ‘Who has been registered for free school meals and pupil premium in the National Pupil Database?’ <https://epi.org.uk/publications-and-research/who-has-been-registered-for-free-school-meals-and-pupil-premium-in-the-national-pupil-database/>

³ Campbell and Cooper (2024) Ibid

understanding the ground-level implementations of policies on FSM-eligibility is more important than ever.⁴

Current eligibility for FSM is based on families being in receipt of qualifying benefits, including Universal Credit, providing annual income (excluding benefits and tax) is below £7,400.⁵ In addition to meeting these criteria an application has to be made on the child's behalf and their entitlement must be verified by either their school or local authority. Pre-school age children who meet the same eligibility criteria and attend a maintained nursery setting⁶ before and after lunch are also entitled to free meals, though previous research has highlighted potential lack of awareness of this policy and lower uptake than expected⁷. Recent estimates highlight that as many as 84,000 children are not eligible due to the type of setting they attend and 31,000 children likely qualify but still face barriers to registration or are unable to access free meals due to sessional care.⁸

Transitional protections have also been in place since April 2018 and were set to end in March 2025, though the Department for Education announced in June 2025 that they will remain until summer 2026. According to the latest guidance available in June 2025, this means that anyone registered for FSM within this period retains their FSM eligibility until the end of their education phase regardless of whether they continue to meet the eligibility criteria.⁹

The government states that responsibility for checking FSM eligibility of applicants lies with individual schools, though schools may choose to work with their local authority, who are able to access the Eligibility Checking System (ECS) which is a government provided service which allows local authorities to determine FSM eligibility based on data from the Department for Work and Pensions, the Home Office and HMRC. 'Maintained schools, academies and free schools are all able

⁴ A government press release (sent by email June 4th 2025) titled 'Over half a million more children to get free school meals thanks to historic government action' noted, 'Transitional protections have been in place since 2018 to ensure no one who gained FSM eligibility would lose it while UC was rolled out. We are extending protections until the threshold is increased in September 2026.'

⁵ Department for Education, (March 2024) 'Free school meals Guidance for local authorities, maintained schools, academies and free schools'

https://assets.publishing.service.gov.uk/media/65fdad5965ca2f00117da947/Free_school_meals.pdf

⁶ A standalone maintained nursery or a school-based maintained nursery

⁷ Cooper and Jiménez (2024) 'How can we reduce food poverty for under-fives?'

<https://epi.org.uk/publications-and-research/how-can-we-reduce-food-poverty-for-under-fives/>; Campbell (2025) 'Who has been registered for free school meals and pupil premium in the National Pupil Database?' <https://epi.org.uk/publications-and-research/who-has-been-registered-for-free-school-meals-and-pupil-premium-in-the-national-pupil-database/>

⁸ Food Foundation (2025) 'Boosting early years nutrition to support a healthy childhood'

https://foodfoundation.org.uk/sites/default/files/2025-05/TFF_Early%20years%20report_2025.pdf

⁹ Gov.uk (accessed June 5th 2025; last updated 29 October 2024) 'Free school meals: guidance for schools and local authorities'

https://assets.publishing.service.gov.uk/media/65fdad5965ca2f00117da947/Free_school_meals.pdf

to use the ECS through local authorities', though they do not have direct access to the ECS, and therefore local authorities play an important role in the FSM registration process.¹⁰

At the time of this research FSM registration practices have been particularly topical. The Education Committee has recommended that FSM auto-enrolment is introduced as part of the Children's Wellbeing and Schools Bill¹¹ and a private member's bill for FSM auto-enrolment is due for its second reading.¹² Transitional protection for FSM was planned to come to an end in March 2025, meaning new applicants to FSM would no longer remain eligible until the end of their phase of education if they did not continue to meet the eligibility criteria, and once again periodic re-checks of eligibility would be required.¹³ However, as this report was being prepared for publication, in June 2025, the Department for Education announced firstly that protections would now continue until summer 2026, and secondly that from September 2026, all children in families claiming Universal Credit will be entitled to FSM.

Alongside this, the Eligibility Checking System is being updated with the potential for schools to directly access the service without the involvement of their local authority¹⁴ and a new child poverty strategy is due to be published.¹⁵

The empirical work took place in 2024 and early 2025, before the Department for Education's most recent announcement on extension of transitional protections to summer 2026, and of entitlement to FSM from September 2026. The findings support the announcement to extend FSM eligibility to all families claiming Universal Credit as a welcome policy development. However, this research also reveals that much more needs to be done to ensure that all children entitled to FSM can actually access a free meal. In particular it highlights first, that barriers to registration remain despite the significant amount of work undertaken by LAs, MATs and schools to maximise registration. Second, that many of the youngest children who are entitled to free meals in early years settings are potentially missing out.

¹⁰ Department for Education, (March 2024) 'Free school meals Guidance for local authorities, maintained schools, academies and free schools'

https://assets.publishing.service.gov.uk/media/65fdad5965ca2f00117da947/Free_school_meals.pdf

¹¹ Education Committee (2025) 'Scrutiny of the Children's Wellbeing and Schools Bill'

<https://publications.parliament.uk/pa/cm5901/cmselect/cmeduc/732/report.html>

¹² Private Members' Bill (2025) 'Free School Meals (Automatic Registration of Eligible Children) Bill'

<https://bills.parliament.uk/bills/3781>

¹³ See list of updates at Department for Education 'Free school meals guidance for schools and local authorities' <https://www.gov.uk/government/publications/free-school-meals-guidance-for-schools-and-local-authorities#full-publication-update-history>

¹⁴ Storer (2025) 'Free School Meals check system redesign to boost take-up' <https://schoolsweek.co.uk/free-school-meals-check-system-redesign-to-boost-take-up/>

¹⁵ Cabinet Office (2024) 'Tackling child poverty: Developing our strategy' <https://www.gov.uk/government/publications/tackling-child-poverty-developing-our-strategy/tackling-child-poverty-developing-our-strategy.html>

Methods

We used the following methods to understand more about the processes involved in FSM registration and how this policy is being implemented in practice:

- A freedom of information (FOI) request to the Department for Education on the number of FSM eligibility checks run by all local authorities that access the Eligibility Checking System (ECS)
- A survey to all local authorities (54 responses which is a 35% response rate) and to a random sample of 149 multi-academy trusts (17 responses with a response rate of 11%)
- Interviews with local authorities (14) and with multi-academy trusts (5 interviews across 4 trusts, including 2 schools)


Additionally, we contacted the Department for Education (DfE) to clarify the policy on free early years meals (FEYM) as well as the eligibility checking service (ECS) team at DfE regarding upcoming changes to the ECS. We also spoke with the Local Government Association and Fix our Food¹⁶ in relation to auto-enrolment. We attempted to interview nurseries whose details were passed on by local authorities we spoke with, as well as members of Early Education, but none volunteered. However, two nurseries did respond to some basic questions about FEYM via email. A more detailed description of methods can be found in Appendices 1-4.

Outline of the report

The rest of the report is divided into six key themes based on synthesising analyses of all data described above. This summarises the main findings from this research strand which are relevant to the likelihood of children who are entitled to FSM being registered for FSM and how useful FSM is for identifying disadvantaged students. Illustrative verbatim quotes from interviews are used throughout. The final section reflects on the policy implications of these findings.

¹⁶ <https://fixourfood.org/what-we-do/our-activities/schools-and-nurseries/gated-content/>

**Findings: How and
why do FSM
registration
practices vary?**

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1. There is variation in FSM registration practices across local authorities and schools

Different approaches across local authorities

Findings from the surveys and interviews demonstrate that, for many LAs, FSM registration is a clear priority and significant resource is dedicated to maximising FSM registration, though there are some differences across LAs when it comes to registration practices.

Importantly, those not included in the survey and interviews include those LAs that have less involvement in FSM registration, for example because they do not play a part in assessing applications.¹⁷ Therefore the variation in practices described here is the variation among the potentially more engaged local authorities.

Differences in application processes

LAs described a range of approaches to FSM registration, requiring different levels of effort from parents/carers to apply of their own volition. This ranges from parents having to proactively make their own application directly with the LA, to schools collecting the necessary details as part of the forms parents complete as their child newly registers at a school, to a more passive role for parents of being identified as eligible by the LA and being given the opportunity to opt out of being registered for FSM if they wish (local automatic enrolment).

More than a quarter of the LAs that responded to the survey described either already having automatic enrolment in place or currently piloting an automatic enrolment approach. Importantly, as described below, this local auto-enrolment is an approach often taken alongside multiple other routes to application rather than replacing other routes to application.

There are also significant differences across LAs in whether parents/carers are required to re-apply themselves if circumstances change after they are found to be ineligible, or whether LAs hold onto their data (with permission) and periodically re-check eligibility of previously ineligible children in order to identify newly eligible children without parents having to repeat applications (herein referred to as 'batch re-checks'). Running batch re-checks and running them more frequently is likely to support higher rates of FSM registration.

Almost half of all LA survey respondents (46%) reported that they do not run batch re-checks for any of the schools in their area, with almost half referring to transitional protection being in place and therefore re-checks not being required. Transitional protections were even referred to by one respondent as preventing them from re-checking. LAs also described practical barriers to running batch re-checks, for example having paper applications which means they do not store the data or not having an application process which allows for asking consent to store data and re-check

¹⁷ Such as Milton Keynes who direct parents to apply directly through schools <https://www.milton-keynes.gov.uk/schools-and-lifelong-learning/information-parents/free-school-meals>

previously unsuccessful claims. One respondent stated “System does not allow it so these would need to be manual checks.” Another reason for not running batch re-checks, mentioned by fewer respondents was not having the staff capacity to run the re-checks, and a couple of LAs were planning to run batch re-checks in the future.

Whilst there is no need for LAs to re-check already eligible children during transitional protection, many LAs do run re-checks of previously ineligible children. Amongst LAs that do run batch re-checks there is also variation in the frequency of re-checks, from weekly re-checks to annual ones. These survey findings are supported by the FOI data received from the ECS (Appendix 1) which shows variation in the number of checks LAs make using the ECS. This variation in re-checks also came up in the interviews.

This method means we don't even have to encourage the parent to apply. They don't have to do anything. So, your parent who is in and out of eligibility and this month has had a low income, they don't have to keep applying, they don't have to- The school doesn't have to keep checking their eligibility. I'm doing that for them, but I check every week, and every week I find somebody new. Then the school gets the money from the following April – well, following the October – and the parent can or cannot, as they wish, take the entitlement.

LA 1

Most commonly survey respondents described their frequency of batch re-checks as being motivated by picking up changes in family circumstances so that children could access FSM as quickly as possible, e.g. “We check weekly to ensure no child waits for more than a week for a free meal if newly eligible.” There is also a motivation for schools to be able to access associated funding as quickly as possible.

There are also practical considerations for how frequently re-checks are made, for example benefit processes and timelines:

All legacy benefits are paid on a weekly basis hence we check weekly to pick up [changes] that would bring them into entitlement to FSM. UC is paid monthly but the time of the month it changes depends on when they first claimed, so rather than check monthly we check fortnightly.

LA survey respondent

Additionally, the frequency was dependant on what schools chose in some LAs. Some LAs had tested different frequencies of re-checks and settled on the one they found most effective. One LA described that they would ideally re-check every month but lacked the resource to do this.

Other relevant features of application processes include how flexible LAs are in how applications can be made. For example, whilst for some LAs there is a standard online application, other LAs described accepting multiple types of applications to maximise accessibility:

So, we have an online application where parents can apply online, and we accept any sort of application, so we accept the online, we accept relaying by a school. So, the school can say, “Please, give us your details.” They can put it on a paper form and either send it in our internal post or scan it in to us. The parents can email us direct. We've got a generic team inbox and they can email that with their details, or telephone us. So, we accept anyhow that

we can...So, we try and make it as accessible as possible. We understand that not everybody has got IT skills or access to IT. So, yes, we do take any application.

LA 2

There are also important differences across LAs in terms of how proactive they are in raising awareness of FSM and increasing accessibility for groups who may face additional barriers to applying, for example through outreach work and translating information and applications into multiple languages, as described in Section 3. It is also clear from surveys and interviews that some LAs have honed their approach to FSM registration to strategically capture as many eligible children as possible in advance of key times such as for the start of their school year or for school census day.

Of course, schools play an important role in promoting and encouraging FSM applications, and have a vested interest in maximising FSM uptake to increase their funding, particularly via the pupil premium. Schools have direct contact with children and their families and provide an important source of information and support for FSM registration. The level of responsibility delegated to schools for the FSM application process varies across LAs and within LAs there is variation across schools in terms of the activities they undertake to maximise FSM registration. Schools with a higher proportion of FSM entitled children and with more restricted budgets have more incentive to be proactive to increase FSM registration. Different approaches to FSM promotion are also appropriate to fit schools' different situations.

So, some are fairly laissez-faire. You know, we've got- We're a typical London borough, where we've got some schools that might have two children eligible for FSM in their school, and others where we'll have 70% eligible for FSM. A real, real mix. And unsurprisingly, where you've got two children, not a lot of effort goes into identifying those children. Where it's 70%, it's all hands on deck, to the extent that they will ask parents for all their details, including NI number, so they can run those eligibility checks themselves in the school for everyone. So it varies from those two extremes, really.

LA 8

...it might also have depended on how financially buoyant the school budget is. Because obviously, some schools are fine, and some are really, really struggling. So, they will have made sure they've got as much money as possible from every avenue.

LA 6

If they are in an area which is low deprivation, low free school meal uptake, they're not going to be doing the extra workload to do that. Whereas, if they're in a high-deprivation area, then the incentive is there.

LA 10

I think the only thing would be we've got school secretaries that push for it more than others, and it's getting to those that don't push for it, and saying, "Could you...? Shall we help you? Can we do any more? Can we encourage you? Do you know you might be missing out and families are missing out?"

LA 2

Yeah, there is variation, and there isn't a one-size-fits-all. I think there are a lot of different strategies that are used, because of course, every school is very different, their communities are very different. The methods of communicating therefore need to be very different, to fit the needs of that community.

LA 14

Differences in incentives and disincentives across LAs and schools

Aside from the approach to FSM applications there are differences across LAs in terms of additional incentives or disincentives to apply for FSM. Some, though not all LAs, continue to provide vouchers to parents of FSM-eligible children to buy food during the school holidays - £15 per child per week – an initiative introduced during the pandemic, but which some LAs have chosen to maintain. For some parents this can provide an additional incentive for signing up for FSM, regardless of whether their child takes up the free meals at school.

That was a big, big upshift of people applying, especially those that had children in Key Stage 1 that were getting the universal ones before, when they would... and, even now, we still get quite a few people that might apply for the vouchers and we turn them down. They're like, "My child is getting free school meals. What do you mean?" and then we have to explain. Then, lo and behold, usually, within a matter of... you know, by the end of the day, they've got an application come in. So, it's a really... it was a really good way of getting the pupil premium numbers up.

LA 4

Additional benefits for signing up to FSM are provided by schools, again with variation across schools. For example, some schools provide school uniform grants and reduced or free school trips for FSM registered children. Whilst FSM (or Pupil Premium eligibility as described below which is derived from FSM registration) is clearly used by schools in this way to target additional resources/provide additional support to disadvantaged children, it was also described that some schools also intentionally use additional benefits to incentivise FSM sign up.

Obviously, as a school, every school is different. This school offers 50% off all trips for Free School Meal children, so they get 50% off. They get £25 per year to spend on uniform. From the local authority, they get their HAF voucher, which is their voucher that they get to spend on Tesco's or sports clubs and all the rest of it.

Academy 4 school 2

For example, we always make sure that when we're doing external clubs or extracurricular things, that we have a certain allocation of free places that we can afford to give to children that are Pupil Premium, which is important because parents can't afford £25 over 10 weeks... For our afterschool and breakfast club, for example, we will always make accommodations for children whose parents have a need. If they can't pay for it, we will give them a free space. So, that would be Pupil Premium driven

Academy 4 school 3

Those starting in Reception, because Reception, Year 1 and Year 2 get the universal infant free school meals, we found out a lot of schools were losing out on their pupil premium funding. So, it started by one school saying, "Oh, I'll give you a £25 voucher for a sweatshirt if you apply for free school meals and you're entitled for the benefit ones."

LA 4

So, I know some schools- I know there's one school that is like, "Oh, if you fill this in, you can go into a draw for a £20 voucher or £50." I think it was £100 actually. If you can prove that you've applied, even if you're not- so some schools, we seem to get an awful lot of applications which obviously come back as not eligible but they want their name in it. But that's their way of just trying to make sure.

LA 6

In addition to the various incentives available across LAs and schools, in the same way that universal infant free school meals (UIFSM) can reduce the motivation for parents to register for FSM, as discussed below, universal free primary meals in London was described as a challenge to FSM registration to be mitigated. This is in the interests not just of the children in terms of any additional benefits, the schools and LAs in terms of associated funding (for example Pupil Premium) but also in terms of funding for the free meals scheme itself. This is because the Greater London Authority (GLA) is only required to fund the free meals of non-FSM-eligible children, as funding is provided from central government towards the cost of FSM. This means the greater the level of FSM registration the lower the cost of universal free primary meals is. Mitigating the potential loss of FSM registration, loss of funding, as well as making the scheme affordable all provide incentives for the efforts and resources being directed at FSM registration within London, for example via local auto-enrolment, as discussed below.

They called it Universal Free School Meals Stakeholder Group. So it's wider than- It's about the food service generally, but within that, there has been a focus on auto-enrolment. Because, obviously, it's better if we can identify all the free school meal-eligible children, that makes their programme a lot cheaper, because they don't have- They're only paying for the children that aren't identified nationally.

LA 8

Differences in LA characteristics

Some of the differences in approaches of LAs are related to differences in LA characteristics. There is variation in the level of resources and therefore capacity for FSM registration-related activities. For example, London boroughs are relatively well funded and supported, in-line with the wider London universal FSM initiative and associated incentives mentioned above. It was discussed in interviews that London boroughs were given £20,000 towards piloting local FSM auto-enrolment. As well as additional funding, London boroughs appear to be supported to share learning and pool resources to more effectively identify FSM-entitled children regardless of whether they attend school in a different borough to where they live (which can be a complication for auto-enrolment processes).

You know, in the absence of national auto-enrolment, what we could do at a pan- London level...London, started providing Key Stage 2 meals. And because of that group coming together, again, lots of discussion about auto-enrolment there as well, and about free school meal provision.

LA 8

By contrast some LAs described having restricted resources which also limits what they can provide for their constituents. One LA explained that when children move their area from London they have assumed they still receive universal FSM in primary school, and they have to explain that they don't offer that and they can't.

Our local authority is under a section 114, which means finances are tight anyway. Even before we went into a section 114, I don't believe the local authority would've had enough funding to be able to provide free school meals for every child in primary or secondary or both.

LA 3

There are clear differences in the human resource dedicated to FSM, with some LAs having whole teams who work on FSM, whilst for others it can be just part of one person's job role. Which department within the LA has responsibility for FSM also varies, including the benefits team, public health, children's services etc and this can influence the focus and approach to FSM registration as well as practical barriers and opportunities. For example, where FSM sits within welfare benefits this can facilitate access to data for auto-enrolment, as well as the application processes for FSM.

it's included in all our claim forms, no matter what you're claiming within the department, free school meals is part of that option, and it's built into all of our forms, all of our correspondence. So every single member of the team will deal with free school meals at some point as part of some claim each day...We have tick boxes at the end of every single one of our forms, regardless of what that form is for, which details and explains that the data provided will be used for us to look at and consider eligibility for all the other benefits that are available. So if they're claiming council tax support, for example, we will have the options at the end that, based on their circumstances, we will look at whether they have eligibility for

free school meals, for Universal Credit, for housing benefit, or possible additional discretionary payments.

LA 7

One of the characteristics of LAs which is potentially influential for both funding/resources and their level of involvement in FSM registration is whether their FSM eligibility checking is a paid for service. Some LAs charge schools for their FSM registration activities, with fees varying from a flat rate, to a per FSM-eligible pupil rate. For some LAs this funding covers the cost of their work on FSM registration, whilst for others it is more of a nominal fee. Other LAs do not charge schools for their FSM registration services. Where LAs do charge this can also lead to increased efforts in FSM registration activities to demonstrate value for money.

The service is kind of funded through, they call it de-delegation, so it's taken out of monies for schools prior to schools getting their funding, but it has to be agreed by schools forum, which it is agreed, and then the academies and free schools make a direct contribution, we invoice them for a contribution towards the cost of the service. And what that gives the city is a single route of application. So everything comes through our team.

LA 13

So I guess we're only looking to recover the team costs and to ensure that those multi-academy trusts are contributing to that and our schools are not left at, you know, a disadvantage. At the end of the day, for us as an authority, you know, our aim is to make sure that we have accurate free school meal recording, that our schools can contact us and get a swift response.

And, you know, you don't have to find many children to make it a really, you know, it's a very cost-effective service. It's an income generator. So, you know, we do work really hard to find people that are eligible.

LA 13

No, it's paid for, but it's minimal. If I tell you we get a cursory admin payment of £30,000 a year in total. It's not about the money. It's the politics of it. It is work that we do, it is work that we build in and it is work that costs money, of course. Is it important to us in terms of does that money go into our budget at full level, blah-di-blah? No, because it works as it works and there is an understanding, in terms of schools, education, that this is our responsible area, and in return, we will do all of this. It's a cursory payment. It doesn't even pay for one of my staff, let alone anything else. It probably doesn't even pay for the system licenses. You know, that's how cursory it is. But it's not about that. It's about, yes, they have to pay us, they have to acknowledge.

LA 7

Now they pay for us, they demand a bit more, as well. They need to get something out of it, to cover the fact that they're paying. So, all those changes, really, have made our service be a little bit smarter.

LA 2

Not all schools opt into this service. There are also differences in the approaches taken with MATs – who may opt in to the service and may pay a different rate, or may be included regardless whether they pay, or may opt out.

...so most schools buy into our service. We do the applications and process those, but as [Name] said, there are 13 that don't buy in, that buy in software and use other methods.

LA 9

But actually, what we do for the schools is huge...they have portals, they have lists, they have- we deal with all their queries, any complaints. It's a massive thing and we do- because at the moment, we charge academies for it, obviously. LA-maintained schools get it all for free. But academies, we charge each year at £500- well, we charge £75 a year for reception eligibility checks. Well, trust me, for some schools, that's a right old bargain. And then, we have three different rates depending on how many children are in the school. So, a little school will pay next to nothing, £100, for us to do their checks all year. But it means that when they get a kid who starts at the school, mid-year, they can just go, "Oh, Johnny is joining us in what have you, can you just confirm if they've got a check on the system?" So, they do it for all their new starters because they could already have it. Because often, the CTF will come across to the school, and it can come a month after the child starts. So, they know that they can give them a free meal from day one then, or not.

LA 6

We're just doing it for them [academy schools]. So we did have a debate about whether we do, because some authorities do charge academies separately for that process, because... And part of me, as a good council employee, says we should. But all those other benefits that those children are eligible for, most of them are residents of the council, we need to be providing those benefits to them, as well. So, if we're doing the work, it's... We just soak it up, as part of our work... We just believe it's a good thing to do.

LA 8

Different approaches across MATs and their schools

Fewer MATs responded to the survey (17) and interviews (5 interviews across 4 MATs), though it is clear from those who engaged with this research that again there is variation in practices, including across different schools within the same MAT.

MATs and their schools are unable to access the ECS themselves and therefore either need to work with their LAs to access this on their behalf or use alternative checking systems.¹⁸ Because some MATs have schools that span multiple LAs this can mean that within their MAT their schools have different FSM registration approaches available to them. One interview respondent described a school that became part of an academy in another area and thereby lost access to the eligibility checking services in their own area, but also the academy was not bought into the services in their own LA either which left them with less support for FSM eligibility checking compared to before.

And all they've ever known, it's the same staff, so they're like, you know, [Name], can you confirm free school meals? And it's like, "Actually, you need to go to the authority that maintains the school." They're like, "No, but our address is in [Place] and it's like, "But [Place], you now need to go to [Place]."

And then they came back to me and said they don't buy into [Place], into their checking, so they'd found it quite challenging not to be able to get the level of support that they were used to.

LA 13

And obviously, we work across five different local authorities so it does make it trickier than it could be if there was a consistent approach...So, dependent on what local authority you're in, it's dependent on how you're bound to apply for the free school meals. Some local authorities are still paper-based which means that our schools are putting the paperwork within the induction pack for any new starters or in-year admissions. But with the ever-changing make-up of our school and demographics of our school, some questions were raised about the accessibility for some of our more vulnerable parents. Potentially, parents who might have EAL or low literacy, how are they able to actually ascertain what they need to do for this?

MAT 2

Where MATs are not included in LAs' FSM registration processes – either because they do not opt in to the paid service, or because they are not automatically included without charge, their students can miss out on the benefits of auto-enrolment and other approaches to maximise FSM

¹⁸ For example OFSM <https://apply.cloudforedu.org.uk/why-ofsm> though note alternative eligibility checking systems are based on the ECS.

registration, along with other schools that opt out of the service. This has significant implications given that 82% of secondary schools are academies or free schools.¹⁹

...we have a lot of academies in [Place]. When some of the schools first decided they were going to go on their own, they lost a lot of applicants. Some of the feedback from two of the academies, three of them went their own way and they all came back, but some of the feedback from two of them was that the parents just didn't want to associate the schools with it. They liked the extra layer. So, you know, you're not going into school... the school doesn't know all... can't see all your bank statements or Universal Credit statements, you know

LA 4

One MAT reflected in the interview that it would be more cost effective and efficient for them to be able to access the ECS themselves, and instead of the fees paid by their schools to the respective LAs, for the MAT to employ someone to ensure FSM registration is done effectively for all schools within their MAT, regardless of LA.

There's also the subscription fees which is a constant across our local authorities, where we are almost held by the local authorities to pay these fees. Now, I've reached out to the system – the ECS?... And they won't allow that within a Trust. So, I couldn't employ my own person to do this overview. It has to be done through local authorities...because, when I spoke to some of these professionals, and they were saying that they were paying upwards of £3,000 for a checking system, I was a bit like, "Well, we've got 27 schools; £3000 a pop for primary, more for secondary. That's a hell of a lot of money that I could be employing somebody to be doing these checks more regularly."

MAT 2

Although MATs can provide another level of guidance support to schools in terms of how they promote FSM, their role in terms of FSM registration is currently limited as they are not able to provide the equivalent FSM checking services of LAs.

¹⁹ Department for Education (2025) 'Schools, pupils and their characteristics' <https://explore-education-statistics.service.gov.uk/find-statistics/school-pupils-and-their-characteristics/2023-24>

2. Changes over time have fed into changes in FSM registration practices

The introduction of universal infant free school meals reduced incentives for parents to apply for FSM but led to increased efforts from LAs and schools

There have been a number of significant events or policies that were described as affecting FSM registration, either in terms of registration rates or registration processes. The introduction of universal infant free school meals (UIFSM) in 2014 reduced the incentive for parents/carers to register for FSM. Accordingly, LAs described increasing their efforts and adapting their approach to maximise FSM registration and counteract any potential drop in FSM registrations and thus missed pupil premium funding for schools. LAs described dedicating additional resources to FSM registration and adopted a more proactive approach, e.g. from parents having to apply directly to collecting relevant information to check FSM eligibility from all parents in order to check eligibility, and encouraging schools to follow up on FSM registration.

Universal Infant Free School Meals made us really rethink, really encourage, because we were aware and schools were aware that, because the meal was free anyway – and at this point there were no vouchers or any other incentive, other than, perhaps, help with school trips and things – to register for Free School Meals, because the meal was free.

So, there was a big need, I think, on behalf of schools, to encourage registration, because they would miss out on the Pupil Premium, wouldn't they? A lot of schools, in a lot of areas, really rely on the Pupil Premium, the extra funding, to support the children.

LA 2

I think we were allowed an extra temporary two members of staff to register everybody for Universal Infant Free School Meals, and we did a big- We actually requested that all the infant schools, or all the primary schools with infant children, really did reg- We really chased up registration and encouraged them for the first time. Rather than, "We're here if you come to us. That's fine," we threw it out there and said, "We need to help you get this Pupil Premium and to get..." So, yeah, we had two additional members of staff, I think, for six months, that their job was to register all these and gather whether they were eligible..

LA 2

...so in 2014, when the provision of universal infant free school meals came in, and it impacted Reception, Year 1 and Year 2. We actually printed 9,000 forms that year to look at the whole three years as opposed to just the incoming... so we've been doing this since 2014... [previously] It was just if people applied.

LA 13

When that came on board, it was government advised, but we implemented it. We offered this pupil premium checking service for schools. And basically, what it was, it's a form that's

got a declaration on it on as to what we're going to do with it or use. And we're asking all the parents to give us their National Insurance number, date of birth, and name, and then we used to check them all off. And it was focusing a lot on the reception children coming in, to put in the reception packs.

And it was to counteract that element of where parents think, "Well, my child is getting a free meal. I don't need to worry about the wider things," because there are all this pupils premium funding, all the attainment levels. All that kind of stuff is all in the bag, but they don't know that. So, I think we've done quite well with that, in capturing that.

LA 12

That's really the critical point, I felt, for schools, having seen what happened in [Place], that actually you're giving Free School Meals to children for the first three years of their school life. The parents are not going to apply, and you're going to lose Pupil Premium funding.

LA 1

Because I think, particularly, since universal free school meal comes in, people just go, "Oh, I'm getting- I've got free school meals." And then, they don't always understand the difference between universal and an actual benefit-related free school meal. So, we do quite a bit of the work. They have posters each year that we update. We do posters in different languages. So, they'll promote that for us.

LA 6

One LA commented that changes in how pupil premium funding was to be spent also undermined the incentives for parents/carers to apply for FSM if their child was receiving a free meal already:

Although they have to complete a pupil premium statement, it doesn't now need to be shown for the individual child... I was actually a chair of governors, and I was working in a school when pupil premium first came out...It was very much each individual child had almost an allowance, and it could help towards music lessons, or school trips, or uniform, or things like that. And you were actually encouraged, right at the beginning, there were pupil premium awards, and you were encouraged to think outside the box. And I remember a secondary school bought a child a bike, because they were coming late to their first lessons of the day, because they were having to drop their siblings off at primary school, and they couldn't then walk to school in time for the first lesson.

So, they bought him a bike. So, it was very much out-of-the-box thinking was really celebrated, whereas now it's not. It's, kind of, absorbed into the budget. So, yeah, there's not as much incentive for parents to sign up, because they don't get as much stuff out of it that

they see... They don't see the benefit to themselves until the child starts Year 3, and then they'll get the meals.

LA 10

The Covid-19 pandemic increased awareness and need for FSM

The Covid-19 pandemic in 2020 was described as having a significant impact on FSM registration, both due to increased need and increased awareness, as the issue of FSM was receiving media attention. A different kind of support was also available, such as packed lunches or food vouchers when schools were closed. Accordingly, there was reportedly a dramatic increase in the number of FSM applications for LAs to process. The pandemic also led to different families becoming entitled to FSM who had not previously been, and who were perhaps less accustomed to applying for benefits and related support.

And obviously, COVID had a massive impact, because when people saw that children were getting vouchers for meals, a lot of people went, "Oh, I want some of that," and signed up. And of course, as soon as they sign up, if then they weren't eligible initially but then, after the third lockdown, they were furloughed or made redundant, that then, in our regular checks, it flagged them up, and we went up thousands during COVID, because more fell into the criteria. And then, because of transitional protection, they haven't fallen off.

LA 10

Also, I think, during COVID, we had a lot of people registering because they were offering alternatives to the dinners, like a voucher, or packed lunches or whatever, food boxes.

LA 2

...going back to COVID, this is when people who you never thought – they never thought – they'd be eligible. Hairdressers, with quite a big cash turnover, were suddenly unable to work and needed all the help they could get...

LA 2

I think it's a combination of some of the schools actively trying to promote it and also parents, during that period... Because there was all that hoo-ha on the telly, in the news, about free school meals and the vouchers and everything, Joe Public became more aware of it as well.

LA 3

One LA also described how the pandemic affected their approach to promoting free early years meals in nurseries. Previously they were not involved in promoting FEYM; it had been solely the responsibility of the relevant schools and nurseries.

It was when parents were working from home. When the children went back to school, they had the nursery children at home and it was, “No, we haven't got any more vouchers, but if you go... What nursery are they at? That's a maintained one. If you apply for free school meals and you're eligible, they can have a meal at school for the whole day.” So, it gave the parents... That's how we sold it, was it gave them a couple of days at home to carry on working from home, if they had that option... because I didn't really get involved with nurseries, to be honest, before lockdown. Then it's only since lockdown, the free school meals with the transitional protections. We found that useful to say to the parents, “Well, look, if you get it in now, you're eligible. We can stick on the transitional protection until the end of Year 6.”

LA 11

Another LA described implementing an outreach programme in their area which targeted families newly entitled to FSM who might have less awareness of FSM.

It came out very much from COVID, post-COVID, because I could see the furlough information by ward, across the whole of the borough, and I could see, even in our most leafy suburbs, furloughing at times tripling in those communities, when that data was coming through.

So, it is very clear to me that we were getting a very different demography, and not wanting to pre-judge anything, but a hypothesis that, “Well, maybe these are families who don't know what they don't know, and don't know what they're eligible to, because their circumstances have changed so much.”

So, we did a pilot with the Citizens Advice Bureau, and I was very keen for them to do outreach work, to link with those communities in school, and piggyback off existing systems. It might be parent support advisors, it might be family support workers, the people who really know those communities, day in, day out, and to have a confidential space to talk to with an expert, in terms of thinking through that very confidential information about finance and eligibility.

LA 14

In addition to the pandemic legacy effects of increased awareness of FSM, and a larger number of FSM-eligible children who, due to transitional protection will remain eligible until the end of their education phase, some LAs have also continued to provide additional FSM-related benefits that were introduced during the pandemic – such as food vouchers during the holidays, which provide an ongoing incentive for FSM sign up.

It was introduced for the Christmas of 2020, and here we are, you know, over four years later, and still doing it, but, yeah. So, it was introduced for then for COVID. Also, of course, on the back of Marcus Rashford with his, sort of, thoughts of children, if they need food during term times, then they need them for school holidays, as well, which is fair enough. So, our only eligibility... well, we've got two eligibility criteria. One, they've got to go to a school in the [Place] area. So, not necessarily live here, but they've got to go to a school in the [Place] area and they've got to be in receipt of benefit-related free school meals.

However, the decision to continue with food vouchers during the holidays is left to individual LAs and some explained that this policy ended in their area.

It was up to each local authority as to whether they chose to do that. At the beginning, most local authorities did choose to do that, because of the impact of COVID in conjunction at that point, it just made sense to do that. We did that for two years.

Once we came out of COVID, we actually had the political argument and we actually met with our councillors and we stopped that, because, whilst it was great for the time, we just felt that a better use of the money was on trying to change underlying behaviours and actually try and utilise the funding in targeted ways where we could actually change people's lives longer-term, and a voucher was never going to do that. And that was a quarter of our funding every single time, you know, because that was something like £1.3m.

The introduction of Universal Credit and transitional protection has impacted the number of children registered for FSM and the eligibility checking activities of LAs

Another significant factor relevant to FSM registration is changes to the benefits system, namely the introduction of Universal Credit (UC). Because of the processing time for UC, there can be a gap when families need FSM but are not yet technically eligible. It was also explained that the ECS has been less well suited to FSM eligibility checks since the introduction of UC and returned more unclear results.

So, if a family becomes unemployed and they are waiting for their first Universal Credit payment... They're telling us, "I'm sorry. I've no job, I've no income, and I'm not showing as eligible," because the previous month they were earning, but they've got to wait... before we can say, "Yes, you are eligible."

Previously, when it was Child Tax Credit and we worked with HMRC more than DWP, there were times that we could ring up on the parent's behalf and say- Because there were things like the Working Tax runoff and things like that that we could ring up and they could say, "Yes, they are going to become eligible in two weeks, once this..."

So, we were able to help families quicker, whereas now, with DWP, we have tried to ring and they just say, "We can't. Until their award statement, we can't tell you anything," which I guess could be correct because they say the reason being that, "Yes, they haven't got a job this week, but they could go out and get a job next week." By the time the reward statement was due to be paid, they may not be eligible anymore.

And when you've gone from a simple, "If they're in receipt of A, B, C, D, or E," in terms of a benefit, "to being under an income threshold," predominantly, under the new Universal Credit. I mean, that is a substantial change.

LA 7

...but the problem we have at the moment is, with the transition within the benefits system at the moment, ECS isn't conclusive right now, particularly around those residents with Universal Credit and particularly those residents with Universal Credit who are actually also earning, because the system can't always clarify what their actual income is, in terms of identifying the earnings and whether the earnings are actually below the qualifying threshold.

So we actually get a large, large proportion of question marks back at the moment. And it's all driven by the inability of the systems currently to be able to read, specifically, Universal Credit breakdowns.

LA 7

Additionally, the associated change in eligibility criteria and the introduction of the earnings threshold can lead to more frequent changes in eligibility status which will become relevant as transitional protection ends and FSM eligibility re-checks focus on checking continued eligibility, rather than identifying previously ineligible children.

As part of the switch to UC, transitional protection was introduced to prevent any loss of FSM entitlement for children whose parents or carers were migrating to the new benefit system, which simultaneously brought in a new income-based eligibility threshold. A clear outcome of this has been an inflation in the number of children eligible for FSM, with no way to distinguish between children currently eligible and those technically no longer eligible but still included under transitional protection. Transitional protection has also reduced the need for LAs to re-check eligibility, and may have provided additional motivation to register pupils during this period. There was some worry from LAs about how they would adapt their FSM registration processes once transitional protection ends. The research with LAs took place in 2024 and early 2025, and at this time, there was also confusion about whether transitional protection was actually ending as planned in March 2025 or not, with LAs explaining they had not received confirmation either way. This silence was interpreted by some as confirmation that the planned end was proceeding, and communications were being put in place accordingly – but also interpreted by others as an

indication that it would be delayed again. The latter transpired to be the case – though this was not officially confirmed by the Department for Education until June 2025.²⁰

We had a massive increase in the number of enquiries coming in for checks. Then, subsequently from that, there was a big jump of the number of children that were eligible from there. Because the protection was in place, the numbers have just increased over time.

LA 3

We do worry. I might be going off-piste a little bit, but I think you'll be aware that the protection for all those that have been eligible, the no longer eligibles, is to end at some point in March, but not until they change their phase of education. The way that ECS runs reports is it just says, 'No longer eligible,' which has been a bit of a grey area because they're no longer eligible, but are they protected, yes or no? That is the next thing. Up until now, we've been able to say, "Look at the report on your date." If they've been no longer eligible with a start date on or after 1st April '18, then they are protected. They're no longer eligible but still going to get Free School Meals because of the protection.

However, come the time that this changes, we will not, as I am aware... I don't know if there's going to be anything else or if it's our IT that need to work this out, but there's no other way to immediately show the general population, the whole entire number on roll, whether they're no longer eligible, protected, or not.

LA 2

Advances in technology have enabled LAs to implement more efficient and effective practices for FSM registration

In addition to changes in policies and events, improvements in technological support for checking FSM eligibility have allowed LAs to process applications more quickly as well as enabling batch re-checks. As well as the move from paper to electronic applications, LAs also described using different software, along with the ECS, to optimise their approach to checking FSM eligibility and sharing data with schools.

I think the biggest change was the speed of processing. So I would say that through the paper application when they still used to have to send their tax credit award notice, that probably from start to finish meant that they waited 10 days. Using the online system, we could process it that day, depending on volumes.

²⁰ A government press release (sent by email June 4th 2025) titled 'Over half a million more children to get free school meals thanks to historic government action' noted, 'Transitional protections have been in place since 2018 to ensure no one who gained FSM eligibility would lose it while UC was rolled out. We are extending protections until the threshold is increased in September 2026.'

So, definitely since I've been in post, the previous... The gentleman who did the job before me, and they didn't have the technology – that has come a long way since I've been in post, too – but they used to have only paper applications, and they used to only save the data of those that were eligible.

At that point, we then invested in further IT software, and we moved a lot of the manual paperwork-exchanging that naturally occurred by email and what have you between schools and our office, and we put it all onto a central portal that all schools were given logins for.

So basically, all the live data became available 24 hours a day, 365 days a year, through them just being able to log on and draw down that data and see at any point in time what their live awards were and what changes, if any, were being made. So that removed that burden out of it because, you know, logging onto a portal to be able to check and do their verification was just so much simpler because they had no reports to juggle, it literally was just doing a data check.

On the whole LAs and schools have honed their approach to FSM registration practices over time

At a more local level, LAs described making significant improvements to their approach to FSM registration, sometimes prompted by staffing or organisational changes which brought in a fresh pair of eyes to question existing practices and seek to make them more effective and efficient. In general, LAs described increasing efforts by themselves and schools to hone their approach to FSM registration over time.

3. There are still barriers to registering for FSM

Data from both the surveys and interviews suggest there remain a number of barriers to applying for FSM. The most frequently described barrier was having English as an additional language. LAs and schools described efforts to make FSM registration more accessible to families with English as an additional language, such as translating application forms, schools helping with filling in applications, and outreach within specific communities.

We've gone to, like, international cafés or Ukrainian coffee mornings and stuff, and we've taken our laptop, and we've done live applications. We went to a hotel where the Afghanistan refugees had been placed, and we sat in their lobby, in a hotel lobby for a full day, and asked people to come down and bring their passports and their National Insurance numbers, so that we could do live checks. Because, there's no way they could've accessed that themselves.

And we had a form that we'd got translated by our translation team into Farsi or whatever, or Ukrainian. And we then took the information from that and put it on our system while we were with them..

LA10

...we had two large communities of South Koreans, or Koreans, and also from India or Sri Lanka, Tamil speaking. And there was talk that there was a stigma around the Korean community about applying for free school meals, even though they'd be eligible for it.

So, I think there was a campaign that was done, and we had the leaflets printed in Korean and in Tamil. And but, I don't recall anyone saying, "Well, oh, because of the Tamil leaflet, 25 Tamil children we found to be eligible," if that makes sense, or, "Families have applied because of our campaign." It was put out there, but it wasn't measured. The response or the outcome wasn't measured.

LA12

Where there're language barriers between communicating with the school and the parent, they may not be able to communicate as well with the school to say that they're facing financial difficulties.

LA3

I would think that sometimes it's people who are new to the country, language-skill barriers, things like that. They're the immediate ones I think of, and I don't think that... I think the school staff are so supportive of them that they do help them. We have school staff saying, "Is it okay if I relay this, because the parent's English isn't very good?" or, "Parent's IT skills aren't very good." Of course, we're always happy to do that.

LA 2

We also have many families in our schools, and I'm sure you'll know this in [Place] and the other LAs you talk to, where, parents, English is not their first language. Often, a lot of the resources are taken up explaining things to parents so that's also another kind of blocker there.

LA5

In both the surveys and interviews, stigma was described as a barrier for some people applying for free school meals, despite FSM status being anonymous within schools, as one LA described. It was suggested that potential stigma may be a reason for some parents opting out of auto-enrolment as well as for not applying directly. Schools and LAs described being sensitive to the issue of stigma in terms of how they promote FSM, for example by emphasising the benefits to the school via pupil premium, and in how they communicate with parents, for example asking all parents to sign up rather than singling people out, or having more private one-to-one conversations with families that appear to be struggling financially.

There's a little bit of, "I don't want people to know I'm eligible," still. Tiny, tiny little bit, but we do get people that say that, "I know why you found me eligible. We were having a bad time, but I really don't want to be eligible. I really don't want the protection. I'm really embarrassed by this. I don't want other students knowing that my child was eligible." So, there's still that, and I think that's quite a shame...

But certainly when I go out, and stand and say to parents, "Will you, please, fill this?" I say, "Pupil Premium." I don't say, "Free School Meal application."

LA 2

It's quite difficult to get parents to register initially because some of them are reluctant to sign up because there's a stigma attached to it.

I think it's more important to talk about the secondary side of it because the primary bit almost takes care of itself in terms of you having those individual conversations with the parents. But there is a real stigma attached to it. So, unless there's an incentive base for it, parents don't often want to sign up because they think there's a stigma attached to their children having free school meals. Even though, of course, when they're having the free school meals, we don't make it obvious that those children are having free school meals, especially as more are.

MAT 1

...because of that, sort of, embarrassment, you know, the way that people felt about it possibly being a point of difference and that they needed this social assistance. It was a real blocker at the core of most of our communities because there was almost a social embarrassment to it.

And we decided to make that change at the same point when our schools stopped issuing different coloured tickets or different queues for whether your child was to pay for the meal or collecting tickets for the meal, and it was all switched to an unidentifiable or what we call an Allpay card, a school Allpay card, which was rolled out into all our schools and it was all part and parcel of that in terms of removing that social burden.

LA 7

However, it is clear that the stigma described is not shared by everyone regarding FSM – as interviews indicated that some parents would talk to each other about FSM and associated benefits (such as school holiday food vouchers) and would enquire about it even when not eligible.

I had a lot of enquiries from Joe Public saying, “Well Jo Bloggs down the road, who lives from me, she’s getting free school meals, and she’s getting loads of money, so I’m entitled as well.” I noticed an increase in... There’s been a lot more communication, amongst parents, with each other. They’re, kind of, self-promoting it.

LA 3

Other barriers that were described include IT skills and digital access, low literacy, not wanting to take up the meals, and confusion about needing to apply if their child gets universal infant free school meals. One LA explained that a school in their area with many Muslim students was found to have low FSM uptake when they identified many eligible children through auto-enrolment though they were unable to determine whether this was due to language barriers, cultural factors or some other reason. These barriers may, of course, overlap.

... unfortunately, the people who need it the most are the ones that are less likely to access it, because they might only have a phone that’s internet enabled. They might not have a laptop, and we all know that filling out big, long forms isn’t easy. They might not be literate, and again, the parents who aren’t literate generally are probably the parents whose children are eligible.

LA 10

Asylum seekers and families with no recourse to public funds (NRPF) were highlighted in both interviews and surveys as facing particular barriers to accessing FSM. In 2022, FSM were permanently extended to children in all households with NRPF, provided they met the relevant income threshold.²¹ However, in practice, in addition to potential language barriers and potential lack of awareness of the availability of FSM, the application process is less straightforward, and some LAs also described uncertainty about whether they were taking the correct approach.

²¹ <https://questions-statements.parliament.uk/written-statements/detail/2022-03-24/hcws714>

Language and knowledge are barriers, we also often find families with a NASS number do not know what their NASS number is and need considerable support to get it

survey response

So, they then came under something called 'no recourse to public funds'. And then, we had to do an entirely different thing, and we had to write a process for their schools, because it's the schools that have to- We're not the ones that can say that they're eligible. It's the schools that determine their eligibility, due to the evidence that they can provide.

LA 10

... we have a paper form for the no recourse to public funds applications, which we generally work really closely with schools to just confirm the position of the families and kind of gather evidence required to process those applications.

LA 13

I've spoken to other authorities and think we're not doing anything wrong, so it's a matter of we have the form, the DfE suggested form that says, 'We're not allowed to work. We have no recourse to public funds. We have less than a certain amount of savings in the bank.' We get them to sign that and we approve it. We don't verify that in any way. We didn't know of a way we could....but it worries me that I've approved that at some point back in 2019. We don't ever take off the protection for those children. Things could have changed and they could now be allowed to work....I don't know if you've got anything you can help or advise, but I'm sure we're not doing anything wrong, because we've been doing it so long, but you just wait for that tap on your shoulder, saying, "You're giving a lot of money away here."

LA 2

That process is a little bit taxing in that, when you put the nano number in, is it nano, it doesn't always give you the correct result. More often than not it says, 'Not eligible.' which then means that we have to go into the manual process. As soon as we do that, as soon as they provide me with the Home Office's letter stating that they are eligible for support under section five, is it, of the Immigration Act I know that they're eligible.

LA 3

There was also uncertainty about whether applications from families with NRPF were included in transitional protection, which is not clearly specified in the Government guidance on providing FSM for families with NRPF.²²

²² Department for Education (Updated 29th October 2024) 'Guidance Providing free school meals to families with no recourse to public funds (NRPF)' <https://www.gov.uk/government/publications/free-school-meals-guidance-for-schools-and-local-authorities/providing-free-school-meals-to-families-with-no-recourse-to-public-funds-nrpf>

And DfE, and there are guidelines on this, but they're very vague, they're very, 'If you feel that they meet the,' you know, 'Please, use this form as an example.' It's not, 'You must do this, and you must see that...' The third bit was that they are actually getting regular checks, but, because we make them eligible and then no longer eligible, they are protected, we believe, until the time that they change phase of education. So, they'll be another group of people that we think, "Well, does their protection stop because they're still not eligible, or are they-?"

LA 2

The other thing that, I think, schools may struggle with is the protection element. Where the parents are NRPF applicants, my advice to schools is, "You need to check them at least once a year, once an academic year." If they wish to check them or recheck them more than once a year that's entirely up to them, but with the immigration status- Because some of these parents that I have seen, they started off as NRPF applicants and they were eligible. When they were given residency they no longer qualified.

LA 3

One LA shared that some families with NRPF were worried that applying for FSM might jeopardise their asylum case and that they could be misinformed by the legal advice from their solicitors. This chimes with another issue that has been highlighted by a human rights charity for migrant rights: since parents/carers applying are required to share their immigration status, which may then be shared with the Home Office, there may be reluctance to apply for FSM, as they may perceive this as too risky. Accordingly, they are calling for a 'data-sharing firewall' with the Home Office in relation to FSM applications.²³

There have been, on occasion, a few people who would be eligible under the NRPF rules but they, themselves, have said, "No, we don't want to take it up." One of the reasons why they've said that they don't want to take it up is someone, their solicitor, has advised them that they shouldn't take up any benefits from the UK, otherwise it will have an adverse effect on their application... As much as me and the school try to convince the parents it won't, because we're not solicitors... So maybe some education for the solicitors to say, "If they are eligible, it doesn't affect their asylum application or their application for leave to remain in the country."

LA 3

LAs and schools described a range of activities to try to reduce the barriers to applying for FSM. LAs described providing training and resources to schools to support understanding of the

²³ https://www.praxis.org.uk/s/FSM-and-children-with-NRPF-briefing_September-2022-public-2.pdf

application process and strategies to maximise registration. LAs and schools work to raise awareness of FSM through social media, school newsletters, posters (translated into multiple languages), talking to parents at parents' evenings and outreach, as described above, through the Citizens Advice Bureau and with specific groups facing language barriers. They also make efforts to make the application process more accessible, as described in Section 1, such as providing multiple application routes including paper forms for people without access to a computer, collecting parent data during admissions, schools supporting parents with applications, and completing applications on parents' behalf. As echoed throughout the survey responses, there was a suggestion that centralised auto-enrolment could help address these issues. There is variation in the approaches based on the information shared, but it is clear that many LAs and schools engage in considerable efforts to maximise FSM registration.

4. Some local authorities are already implementing local auto-enrolment, though this does not replace existing registration practices

Definitions and approaches to auto-enrolment

From the surveys and interviews, it is clear that ‘auto-enrolment’ is used to describe a range of approaches aimed at reducing the effort required by parents/carers to apply and increase FSM registration. For example, some local authorities described their approach as auto-enrolment when collecting all the necessary details of parents/carers to check FSM eligibility (name, date of birth and national insurance number), via schools when children are first registered. Another model is to ask for permission to check for FSM eligibility when any other benefit is applied for, embedding this question into all benefit application forms. In its purest form, (in terms of automaticity for parents/carers), parents/carers are not required to share data, instead eligibility is identified from existing administrative data and parents/carers are only required to confirm their permission for FSM registration – typically through an opt-out model.

Even when using administrative data different approaches are taken across LAs, largely informed by their different characteristics. Some had access to only part of the data they needed and still required schools to e.g. share names of parents/carers. Some faced a lag in the data used and therefore had an additional step of having to check if parents/carers still met the eligibility criteria. For some LAs their approach was informed by working with Fix our Food who provide a free FSM auto-enrolment toolkit²⁴, or with the consultancy Policy in Practice²⁵ who provides support with data linking and identifying potentially FSM-eligible children. Additionally, LA approaches to auto-enrolment were informed by what other LAs were doing and by sharing best practice and lessons learnt.

LA characteristics are also an important factor in how feasible it is for them to implement an auto-enrolment system. For example, for non-unitary authorities accessing the data needed is more challenging. Whilst the initial setting up of auto-enrolment can be time- and resource-intensive, there are different levels of funding available to LAs for this exercise. For example, London boroughs received £20,000 each from the London Mayor to pilot auto-enrolment. Additionally, London boroughs described having access to a network for sharing learning and collaborating across borough boundaries. Not all LAs have a team dedicated to FSM, nor do all LAs have the budget to bring in help from external consultants for auto-enrolment and, as described in Section 1, the responsibility for FSM can sit within different teams across LAs which can also influence auto-enrolment – for example, when FSM already sits within the benefits team data sharing for

²⁴ Fix Our Food ‘Free school meals auto-enrolment toolkit and resources’ <https://fixourfood.org/what-we-do/our-activities/schools-and-nurseries/gated-content/>

²⁵ Policy in Practice <https://policyinpractice.co.uk/about/>

auto-enrolment may be relatively easier. It was also commented that, for example, public health teams tended to have more resources to lead on auto-enrolment.

In London, luckily we've got a London group, so they're able to share their data sharing agreements with each other, discuss the issues with each other. So those colleagues have kind of helped get everyone comfortable with that.

LA 8

But then if you look at what my officers are doing anyway, actually in the bigger picture, in the grand scheme of things, it doesn't take them much more time than what they're currently doing anyway. A form is a form is a form. If they're having to click one extra button to award free school meals at the same time as they're processing housing benefit or council tax support, then how are you going to account for that 30 seconds or 60 seconds?

LA 7

...we've seen it in other councils. They've only seen benefits but it's about that initial time, and effort, and money, because a lot of the councils who have been able to put it in place have had a project manager, had an outside consultancy to help them get it up and running.

And I've said, "I really am interested but I have so much work on, I have not got time to project manage this, and make sure everyone's on track." ...We just need someone. And I'm like, "Who do we go to? Who do we get to be that person?"

I said, "Because with all due respect, coming from an education side, the councils that I can see have managed to put in place are normally public health run, or within their intelligence hub. People who have got a bit more-" Well, public health tended to have a bit more money, let's say, for project work. We don't. Our CYP budget is overspent and the main priority in [Place] is special educational needs.

LA 6

It is important to highlight that where auto-enrolment had been introduced, this had not replaced other FSM registration processes, but was in addition to other routes to FSM registration – such as direct applications from parents and collecting data from all parents during school admissions, with one LA describing it as an additional step to catch any FSM-entitlements that had not already been picked up by the other processes in place.

I think now, we know it's an additional once-a-year mop-up to try and get extra ones on, but then the normal processes carry on through the year.

LA 9

Interviewer: So, at the moment, although you're doing auto-enrolment you're still getting applications directly from parents and from schools as well, is that correct?

Respondent: Yeah, it's a multi- And it has to continue that way, as well. You know, with our schools, one of the worries was with London's Key Stage 2 meals coming in. Now, with, effectively, universal free school meals at primary school we would see a drop-off.

LA 8

Another important point is that although parents/carers may be automatically registered (with consent) for FSM without having to actively apply themselves, auto-enrolment is not an automatic process but rather one that needs to be repeated to capture newly eligible children as circumstances change. LAs differed in how frequently they implemented auto-enrolment - for example, from having it as an annual exercise to repeating at key times of the year.

Finally, auto-enrolment could be hugely time- and resource-intensive for LAs, especially for initial setup, as discussed further below. So, while it may appear automatic to parents/carers, it is generally not a low-resource process and tends to require ongoing input from LAs.

The challenges of implementing local auto-enrolment

Setting up local auto-enrolment can be resource intensive

LAs described the process of setting up local auto-enrolment as being very resource-intensive, requiring significant staffing capacity often across multiple departments - public health, revenues and benefits, legal, business, education - and time needed to set things up. For some, this included visiting every school to secure their buy-in. LAs commented that the initial setup requires more resources but this should lessen going forward, for example once legal queries are already resolved and any practical issues are ironed out. It is also worth mentioning the considerable activity of LAs in sharing learning and support, for example in relation to the data challenges discussed below.

So this time last year, we were, kind of, still in the throes of can we do it, is it legal, have we got permission to use the data and all that. So we jumped through a lot of hoops to get the permission to use the data, but yes, in the end, we used housing benefits and Council Tax reduction data that came from the revs and bens team. They passed that to our data and intelligence teams who did some matching to see what children on the system who were eligible for free school meals weren't signed up for free school meals.

So they identified those children and then our free school meals business support team wrote out to the families to say, 'We think you're eligible. Do you want us to enrol you? If you don't, this is how you opt out. If you don't opt out, we'll enrol you onto the system', and then they enrolled them over the summer last year...

So we actually had a dedicated project supervisor person who would come in and do all of that process mapping and keep putting the meetings in, keep identifying more of the people that we needed.

It was a monster of a project and involved almost every single department in the council. It was enormous, the amount of time, effort and people that it took.

LA 9

So, basically, we had this cohort of children and we were like, “Well how can we check their parents? We don’t have any details.” Now those children... [Name] went to every school and said, “Can you give us their parent’s name?” That was... You know, can you imagine that happening in the summer months? It was incredibly difficult for him to manage that. A lot of schools were on holiday. It’s not a priority. Those school offices have limited resources, you know.

We also have many families in our schools, and I’m sure you’ll know this in [Place] and the other LAs you talk to, where, parents, English is not their first language. Often, a lot of the resources are taken up explaining things to parents so that’s also another kind of blocker there.

So the idea was to get all this information back and then we would work closely with Revs and Bens.

LA 5

So, it took several colleagues a lot of meetings, particularly with legal, to fully understand the data sharing agreements. It involved linking with other partners across different LAs who’d already done this, to understand what they did, why they did it, how they did it, and learn what went well and what didn’t go well. So, that involved senior colleagues, including myself, from [Place], from those other local authorities to join those meetings, to share their learning.

And of course, it’s using the corporate management team, because this needs to go right to the top of our strategic leadership, to get the authorisation to do what we plan to do as well.

LA 14

...we have a project team who've been collating data from within the council, from Benefits, and from schools and from various others, to do an auto-enrolment project.

LA 11

We put in a two-year plan and we worked through that plan with schools. The initial two-year plan was about stabilising and building in and changing all our forms gradually and all our processes so that free school meals was an automatic consideration in terms of everything that we did in terms of the bigger benefits and support picture. It wasn't easy dealing with 68 schools, trying to get them all on board, different staffing levels, different sizes, some had the ability, some didn't.

So we visited every school, we attended every headteachers' forum, we put together a full process overview and an overview of the plan of what our aims were and issued that to all the schools. And we defined what parts of the process we would need them to actually be on top of and to control, because it was a partnership approach and we wouldn't be able to get where we needed to be without their support, and they wouldn't see their numbers and their funding increase by default without our support, so it had to be a partnership approach in terms of joint responsibility to push this forward.

LA 7

Legal challenges to setting up auto-enrolment

There were a number of challenges related to establishing the legality of using parents' data for auto-enrolment, under the General Data Protection Regulation (GDPR). One LA explained they justified their use of data to the Department for Work and Pensions (DWP) based on the public good. Getting permission from DWP was also described as a hurdle to contend with, along with other challenges such as the supposed requirement for families to apply and experiences of inconsistent responses from different government departments.

To actually describe the level of complexity about sorting all this out because there were three very, very separate legal hurdles to get through. A lot of hoops to jump through. This is possibly the most complex thing that either of us have ever done...

Part of that is because of the legal hurdles because some of the times, we were just actually waiting to hear whether or not legally we would be able to give them permission for X, then Y, then Z. Then when we actually thought we had everything legal in place, it was announced that if a certain person is accessing data from a council website or a council database, then they don't need the DBS check, but because it was from external to internal database, then they suddenly needed a DBS check... So it became a lot more frantic...

LA 9

Just to clarify my point that I made earlier, the legal basis that we are satisfied we can do this is the Data Protection Act 2018, in terms of the re-use of data for a purpose outside of that which it's originally held. It needs a lawful basis, and the lawful basis to reuse DWP data for the purpose of FSM auto-enrolment, it's a combination of two legal bases: One is the UK GDPR Article 6(c), legal obligation.

And then, the other is Article 6(e), public tasks. So, that is the legal basis within which that we're satisfied we can do this. So, clearly, it does involve DWP data. It involves processing housing benefit and council tax reduction claims.

It was also evident from the surveys and interviews that LAs had different experiences regarding whether or not they were granted permission to use the necessary data. These inconsistencies were a barrier to some LAs and to others meant they had to carefully consider how they approached the issue of asking for permission to access data and the justifications they used.

So the first part really was around GDPR, and when it comes to that consent, you don't need consent because it's for a public good. So it's under the same kind of legal principle as you don't need consent to access people's information in order to contact families around vaccinations. So for that public good, you can actually just go and contact people. You can go and say, "We are able to enrol you." However, it got a lot trickier when it came to the actual data around benefits because ultimately, the data controller there, or the data holder and owner is the DWP.

Now, there's a memorandum of understanding between the DWP and every local authority and it's how you go through the hoops with that, because although it's the local authority that's holding that data, ultimately, it belongs to the DWP. Now, it's one of those, a lot of places, I think, hadn't specifically gone and asked permission from the DWP because within that, it says that information can be freely shared for use for welfare. So free school meals are considered welfare there.

So there was quite a lot of legal fudginess, but I'm actually quite pleased that [Place] decided- okay, I'm pleased now in retrospect. I wasn't at the time, but we basically said it's not good enough to just assume that this is a welfare. We still have to ask permission from the DWP to use its data. We did hear about other places who'd gone for that permission through the memorandum of understanding and been told, "No, that's not what you want. You need to go through the Department for Education," and the Department for Education had come back and gone, "Oh no, it's the DWP." So they ended up in the doom circle, the, kind of, total loop.

We have done some work on this [auto-enrolment] in the past, but as an organisation we don't have an application process where you are agreeing to that data being used to determine other welfare benefits like FSM, so we don't operate an 'opt-in process'. In the past we have done some data matching against the Revenues & Benefits data, but in 2022 when a Data Sharing Access Request was done it was turned down by HMRC, as they said their data regarding an individual's earnings could not be used for purposes other than that for which it was originally intended, so the data matching process stopped.

Survey respondent

Data-related challenges

Other challenges related to data included accessing the necessary data, the potential for errors when using data matching, and the timing of when data was received – whether the information was up to date and how it aligned with census day. As some interview respondents highlighted, even when LAs did have access to certain benefits data, families could still potentially be missed, as they might be claiming other types of benefits not covered by the available data for example Council Tax Reduction.

So, when we had that information of that cohort of parents, we then worked with Revs and Bens so Revs and Bens could see... Now this is a very tricky data-matching process, and this is where there were stumbling blocks because so many children had the same name, the same date of birth, and the danger is that you match the parent on benefits to the wrong child. So a lot of parameters had to be in place to minimise that as much as possible.

So the idea was that Revs and Bens would be able to... They would only, remember, be able to potentially identify a parent. There's no guarantee...

Although we have Revs and Bens, there are parents on different types of benefits. Those are different, they sit within housing, they sit within different departments. So a parent may not appear on council tax benefit but they could appear on a different benefit that we may not have visibility over.

LA 5

I think because we haven't only just collected their data, it could be a year later. I don't know, I guess it's that auditability of it, isn't it? And experience of phoning to tell a family that they've shown as being eligible for free school meals to be told that they're categorically not because their income is way above that.

LA 13

Because free early years meals (FEYM) for children at the pre-school stage include the additional criterion that the child must attend before and after lunch, and are only required in maintained settings, there is an extra step required in identifying eligible nursery children.

Ultimately as well, you don't have to have your child in a nursery. So that makes it actually a lot trickier, because we then have to say, "Okay..." When we're cross-referencing, you can say, "Well, we've identified all of them, but they're not in a nursery, or are they with a childminder?" It is a lot, lot more complicated and it may be that simply we don't have the capacity to do something like that because it is far less obvious, far less legally easy as well. Just the actual logistics of it...

LA 9

Complicated cases for local auto-enrolment

Where LAs had successfully implemented local auto-enrolment there were still complications that were difficult to address at the LA level. For example, children attending school in a different LA from the one they live in; children attending schools where either the school itself or the academy trust had opted out of the LA FSM service and were therefore unable to enrol them for FSM.

So, what our current process doesn't find- Or we can't match them to our census if the child is a resident in [Place], but they go to a school outside of [Place]. So they won't appear in our census, we can't match them, can't find them.

But in London, that's a lot of children, because a lot of children go across the borders, etc. So we're looking at how we find those children, as well.

LA 8

Roughly, around 800, but 100 of those were children from those 13 schools. So we couldn't enrol ourselves because they didn't buy into our service. There's about 100 there that we wrote to them. We wrote to the families, wrote to the schools and said, 'These families are eligible. Can you get them signed up?'. So there were 100 there we couldn't enrol, and then there were just short of 700 that we then could enrol ourselves that we did. So yes, 700 to 800 mark we had, yeah... But just because a child was at a school where they had their own system, we didn't want to exclude them. So we wanted to make sure that- I mean, we are not able to physically put them on the system, which is why we thought, "Well, from a moral, ethical and technical standpoint, we have to let those schools know that they do have children who are eligible, that aren't enrolled and that their system hasn't picked them up." So we did that.

LA 9

Although two MATs described in the surveys either using or moving towards auto-enrolment, this was not something we were able to explore in the interviews as the MATs and schools we spoke to were not using or planning to use this approach. However, one local authority interviewed described that, when the auto-enrolment exercise was implemented, they found a disproportionate number of children previously unregistered in academies.

But academies in the primary sector, in the last two rounds, have been disproportionately represented as... You know, we've found more children in academies relative to the number of children that are in the academies, if you see what I mean.

So that raises some questions about their process for identification when they come into school, versus a maintained school's process.

LA 8

One LA also mentioned the issue of children not in school who may be entitled to FSM.

So, I think auto-enrolment is really quite challenging. So, on that list, we have a significant number of children who are electively home-educated and they don't fall under the guidance for government for free school meals.

LA13

Impact of local auto-enrolment on FSM registration

LAs described the number of previously unregistered children entitled to FSM who have been identified through auto-enrolment and the significance of the associated increase in pupil premium funding for schools. Compared to initial estimates, some LAs found the number underwhelming, but reassuring in terms of the effectiveness of their existing approach to encouraging FSM take-up. For some, the numbers identified grew as they tweaked their approach. In terms of patterns of who was identified, answers varied from not having the data or not having reviewed it, to picking up more children at primary (which is in line with our previous findings). One LA mentioned identifying more children from a school with a large proportion of Muslim students and wondered about language barriers. Others described finding fewer and fewer eligible, suggesting they are more successfully closing take up gaps as they repeat the auto-enrolment exercise.

I mean, if we break that down into primary and secondary, 203 extra pupils were across 42 primary schools. So, that yielded about £294,350 of additional pupil premium funding per year. And then, in terms of secondary, it was an extra 121 pupils across 20 secondary schools, and that was £127,050, again, of additional pupil premium, and that is per year. So, quite a difference in finance.

LA14

In total, there're almost 600 children that have been auto-enrolled so that is a huge amount. That's £7m to the schools.

LA5

We have just run it for the third time, using October 2024 census data, and again, our percentage hit has got better again. So we found another 275 children now, from a long list of about 360. So the process- The initial identification is better, and we're finding more of those to be eligible. So we're up to 550-odd children that we've found now, through that process.

LA8

So there had been a big marketing campaign to try and get more children enrolled anyway, and then it got to a point though- and we explored this later actually. We talked to the people in charge of that marketing campaign, and they had concluded themselves that unless there was an auto-enrolment project, then they weren't really going to get that many more children enrolled just by advertising it.

So they were just coming against too many barriers, and they actually said at the time that they'd be throwing good money after bad if they continued just to try and advertise it, and something else was needed and auto-enrolment, they concluded, was the way to get more children on the system.

LA 9

The potential for national auto-enrolment

Taking together the challenges described above – the resources required, the conflicting legal advice, the complications that are difficult to address at the LA level, as well as the need to repeat the process periodically to capture changes in circumstances and the need to continue existing FSM application processes alongside – there is a strong case to be made for centralised auto-enrolment.

Some of the LAs interviewed called for national auto-enrolment, commenting on the amount of time and resource it takes and the challenges and the need to jump through hoops, when the government already has the data needed and could implement it themselves. They also argued that if children are entitled, they should be signed up automatically.

Well, it would be so good, wouldn't it, all of this data that we've had so much angst about, finding a legal basis for sharing it, whether it's GDPR or elsewhere, that data is centrally held, isn't it? So, wouldn't it be great if, centrally, the children were identified, and then there isn't the, kind of, dancing round the handbags that we have to do.

All of the resources that are really tight, whether it's customer service, whether it's schools, if it was just identified centrally, and everything flowed from that point, that would save a lot of hassle. So, a real plea, if you can influence any policy so that there's that central identification from that centrally-held data that we know straight away, with 100% coverage, who is eligible, that's the dream scenario for us.

LA 14

Accurate eligible on-roll, LA-by-LA, young people and children. You know, if they know those kids are in those families and they know they're eligible and they should be getting a free school meal, then why don't we know? Why have we not got access to that data? Why do we have to jump through hoops and speak to and argue with and have all these battles trying to get this data, and in the end, we're told, "No, you can't have that. No, you can't have that. No, you can't use it for that." It's ridiculous. Ridiculous.

LA 7

Well, it's a nonsense that we're all doing it, to be honest, isn't it?... It should be done at a national level. And, if not, at a London level. Because at least then- You know, we know where all the children are going, and the funding and the resources can go with the child. It's crazy that we're doing this in 33 different London authorities.

And I know, just from the conversations and the meetings, that I get asked to do- I mean, I've spoken to, I think, about 15 other authorities, just to say what we've done, and they're worried about it. So that's a huge resource and capacity, that's impacting.

LA8

5. Variations in the interpretation of the free early years meals policy

Free early years meals (FEYM) provide a particularly stark example of how a national policy is being interpreted and implemented with huge variation. The Department for Education confirmed that:²⁶

- Free meals are available to nursery children attending a maintained school, free school or academy, where they meet the same benefits and income criteria as for FSM, and are receiving education both before and after lunch.²⁷ Where these conditions are met there is a duty to provide free meals.
- Nurseries are expected to meet the costs of providing the free meals within existing budgets.
- Transitional protections also apply to nursery children and so if registered for free meals during nursery they remain eligible for free meals until the end of primary school.

However, it was apparent in both surveys and interviews that there is a spectrum in terms of how this policy is implemented, with some LAs including FEYM in their local auto-enrolment processes (alongside other registration processes) and alert to the additional benefits during transitional protection, to no access at all to FEYM in some LAs.

Interviewer: So, it makes a difference, the auto-enrolment process?

Respondent: It does, yeah, and especially for the nursery children, actually, because I don't always know about the nursery children. So, I can at least pre-empt them going into a nursery, by saying, "You would be eligible if you went to a maintained nursery school."

LA 11

... that's through the auto enrolment. Normally, I would not get involved with the nursery children. However, schools and the school meals contract, we do feed some children that are in full-time nursery. Some parents pay for it, but if a child is on free school meals, like these 24 children, they'll only get a free meal if they do a full day in nursery, so they have curriculum activity before and after lunch, and that remains.

LA 12

Interviewer: Are nursery children included in these auto-enrolment checks, in your maintained nurseries?

Respondent: Yeah. So in our maintained nurseries or if they're in a nursery in a maintained school, then we'll pick them up. And obviously the amount of- We don't actually know

²⁶ Via email correspondence

²⁷ This additional eligibility requirement was imposed in [The Education \(School Lunches\) \(Prescribed Requirements\) \(England\) Order 2003](#)

currently what that amounts to in cash terms, because it's linked to the number of hours that the child is in that nursery setting for. Which can be different, for different children...But the main thing is we identify- And it's a much lower amount, but the key thing is we've identified them. And then we can track them through- You know, they can get access to the other benefits we've already mentioned. But then, when they hit a reception school, then we can make sure that we've checked that they're still eligible for free school meals.

LA 8

...we do deal with nurseries, and promote it in the same way, as we would.. we promote it through the school in the same way if they're maintained, and they will do it for nursery children. But our website and our information makes it very clear that to actually receive the meal, they need to be attending before and after [lunch] because obviously, they wouldn't need one otherwise, would they? But to put them on the system. But then when we come to that time like now, where if they're getting a school place, but they're in the nursery already, we will start adding them so that they're eligible at the time to then when they go into reception, they will get that eligibility.

Because we see a lot of applications obviously at the time of allocation of- especially where children are in nursery. So, we do support the nurseries as well, where we can, and where we need to.

LA 6

One LA explained in their survey response that in answering the question it became apparent that there was confusion about this policy which they are now looking into:

This survey has highlighted that there is confusion in the EYFS dept around whether pre-school children can access FSM. There are only 3 children down as being registered for FSM in [place], this is now an area we are working to improve and we will ideally capture these children in our auto-enrolment project.

LA survey respondent

Importantly in some LAs potentially entitled children did not have access to FEYM either because the LAs stated that they do not believe nursery children are eligible for FSM, or because the nurseries did not provide meals and therefore, as one LA survey respondent put it, “there is no benefit to applying for FSM”. In each of these situations the policy was not interpreted as a duty but more as something that is optional, though again there is variation – as one LA described finding a way around the lack of kitchen facilities:

... but not all of them have a vehicle to be able to provide the meal. So, that's the other problem, is that some of them don't claim it because they don't have a contract with a caterer that can provide a school food standard compliant meal. So, if they're a maintained nursery,

but who don't have a kitchen on site or a kitchen delivery, then they don't claim it, because they don't have a way of feeding those children.

LA 10

Interviewer: So, in that case, it's not interpreted that there's a statutory obligation to provide a meal for that child?

Respondent: So, we have only just discovered this, only in the last couple of weeks. So, we're having a conversation about that at the moment. So, because I would say that I can't speak on behalf of the county council, but I would say that there is a moral argument that they should then find that, if we've identified that they are that, that it shouldn't be about that. But, if a nursery doesn't have a way of doing it, I don't know how that would work.

LA 10

I do lay that out and say to them, "If they're there in the morning and afternoon, you must give them a free meal. You have to make provision for them. And if you don't have a school kitchen..." ... So, we work with the catering provider to transport meals there in hot boxes, to feed those children, because the nursery didn't have facilities. So, we do do exercises like that.

LA 12

Respondent: No, so for school-age they do, school-age children, there's a statutory duty, but I don't believe that statutory duty is for pre-school children.

Interviewer: So, where they do provide free meals for pre-school children, that's something they can do, but they don't have to do?

Respondent: That's my understanding. Yeah. We encourage them, we strongly encourage them. Some schools it's just operationally not possible. For other schools, they see it as an opportunity to get children in their door, who will most likely remain with them when they go to school.

LA 13

One LA explained that the guidance on FEYM was not clear because it depended on how you interpret 'full-time education', though the official guidance described above does state that in order to be eligible, nursery children that meet the criteria 'must be receiving full-time education or must be receiving education both before and after the lunch period'.²⁸

This is where, I think, because it's full-time education, it's the interpretation of that... It's that education that isn't defined as to what that means, but certainly within [Place], as I said, and I know... I don't think we're the only authority that does it, but there isn't the facility

²⁸ <https://www.legislation.gov.uk/ukxi/2003/382/article/3/made>

for nursery-aged children to have a meal at school. The reason I mention our unique setting is because, obviously, the Reception-aged children, that's clear they do have an entitlement to a meal because they're of Reception age... but because they're pre-compulsory school age so that it's that thing about, in the guidance – in the Statutory Instrument, sorry – it's making reference to those that are receiving education, but it doesn't stipulate what format that education takes as such.

LA 1

Where there were systems in place to register children for FEYM there was also sometimes a lack of awareness of how long this free meal eligibility was maintained through transitional protection, identifying the end of nursery as the relevant end of education phase, whilst official guidance to local authorities, as another interview respondent shared, specifies that the end of education phase for nursery children under transitional protection is the end of primary school.

For others the transitional protection provided additional incentive to get nursery children registered where entitled. Interestingly, the before and after lunch criteria means that even in the case where a parent meets the income and benefits eligibility criteria when their child is in nursery, if they are not attending before and after lunch their entitlement is not recorded and they would have to reapply in reception, assuming they still meet those criteria.

And then, even if they were classed as FSM eligible, so they did stay for the lunchtime session and they were morning and afternoon, they would be re-checked before they then went into the school's reception, because that's classed as the end of their school phase. So, we re-check all children who are moving into reception, if we've got their details. And so, if their parents' status [has] changed, if they've come off benefits and they've got a job, then they won't continue their free school meals eligibility or transitional protection from reception, unless they still tick all those same criteria

LA 10

Also, because my understanding is that their end of phase of education is classed as the end of primary school. So why wouldn't we sign them up when they're nursery and have that guaranteed option?

LA 13

Then it's only since lockdown, the free school meals with the transitional protections. We found that useful to say to the parents, "Well, look, if you get it in now, you're eligible. We can stick on the transitional protection until the end of Year 6."

LA 11

There were also inconsistencies found in how the FEYM policy was being implemented across different types of maintained nurseries – school-based maintained nurseries vs standalone maintained nurseries, with the latter potentially not being included.

...because we weren't aware that the maintained nurseries gave their children a UPN, and were still- Because, they weren't attached to schools, but they were a school in their own

right. And we hadn't, as a team of two, we hadn't realised this, because we just hadn't been in that loop of it. So, they had always been told, as a nursery, a standalone nursery, that they couldn't do free school meals. But, when we realised that they were doing censuses- And that's down to the fact that we'd just never had a conversation about it, it was just new... So, it's not that they've been getting the funding and not spending it. It's just that they've not had any funding, because they've always said, "Zero free school meals." Because, also, with some of them, the criteria has never been explained to them, they don't have the same training, because they're not in a school. So, it's just been a perfect storm of just the communication hasn't reached the right people, and it just hadn't been realised yet. So, that's a discussion to come.

LA 10

Some LAs described variation across nurseries even within school-based nurseries, encouraging them to provide free meals where children are entitled, but not treating this as a requirement.

We've got two standalone maintained nurseries in [Place]. One provides meals and one doesn't provide meals and then we have a number of schools that have nursery settings and we encourage them if their session times meet the requirement, i.e. children can stay morning and afternoon, then we encourage them to provide that offer of a meal...We've got seven of our schools have nursery classes that provide meals. There are a few more that have nurseries, but don't offer meals.

LA 13

And nurseries, I think, I'm not 100% sure, would have that obligation. If that child is eligible for benefit-related free school meals, you need to provide them with a meal, if they're there all day.

So, I know there's obligation or responsibility for governing bodies to make sure certain things happen in school when it comes round to school meals. I'm not sure about the free school meals part in a nursery.

LA 11

Perhaps one of the difficulties with the FEYM policy is that responsibility for implementation often lay with a separate team – for example Early Years – to the team that dealt with FSM registration. Some of the LAs were not aware of the registration processes for nursery meals because this was handled by a different team, treated separately from FSM registration. Some LAs that responded to the survey asked for input from relevant teams and interview respondents helpfully passed on contact details of maintained nurseries in their area who would have more insight on this policy. The two maintained nurseries we contacted, from two separate LAs, did not agree to an interview, but did confirm via email their overall practices in relation to FEYM, which again highlights the different chances an entitled child has of being registered for FEYM depending on where they attend nursery, with one explaining they operate in-line with national guidance which they quoted and the other explaining they do not offer free meals because children bring in packed lunches. As the quotes below illustrate there is wide variation in the likelihood of an entitled child being able to access FEYM.

The nurseries don't buy my checking service, so they do their own, but they're only funded for Early Years Pupil Premium. They don't get FSM Pupil Premium, because they're too young. I appreciate the Pupil Premium funding isn't to pay for meals.

LA 1

But, I don't think there's anyone specific in the early years team that's doing anything about free school meals, if that makes sense? But, I think it's more on the nursery level.

LA 11

I assume that's what it is. I let the early years team do their thing and they tell me how many children are entitled to benefit-related vouchers, the free school meal vouchers... because we only look at the statutory school-age children so Reception onwards.

LA 3

They're having their information collected, but it is a completely separate process. We have nothing to do with what we call Early Years. We keep Early Years very, very separate, because, the way that our borough administers it, it's tied up with the childcare access, vouchers, support, and that's a whole separate team, because of the logistics around that.

LA 7

There is also variation in terms of how the FEYM policy is applied with relation to children receiving the meal – with some nurseries using their discretion to be able to offer a meal when children have not had to attend before and after lunch in order to be eligible to receive it.

If children are doing the two and a half days, we will honour a lunch on the third day, even though it only might be a half day on the basis that the children that are coming in on the other half of the day, maybe aren't getting a lunch. It's very small numbers in total.

LA 13

They can't be in in the morning, have lunch, then go home. They're not eligible then. So, they have to be within... they have to be in lunch before... classroom in the morning, lunchtime, classroom in the afternoon and they are entitled for benefit-related free school meals for up to two full days within their 15 hours, because the other day would only be a half day. That's not [Place], that's, sort of, throughout England.

LA 4

Respondent: So, one school we have in [Place] specifically, lots of the children will come in before and then do their afternoon session. But a lot of them do the morning session. Just the way the families work.

Interviewer: And if they are entitled to free school meals, they can have that, even if they only do a morning session or an afternoon session?

Respondent: Yes...They tend to stay for it. Sometimes, we get the parents to come in and visit as well and have their lunch...Just as a way of getting them involved...

So, if there's a child there who's maybe not even on free school meals, but we know that they might not have a meal if they go home, we'll give them one before they go.

MAT 1

The additional criteria for nursery children to attend before and after lunch, which we have written about elsewhere²⁹ makes the process of checking eligibility more complicated for LAs, including when using auto-enrolment as discussed above, and may be one reason why checks for FEYM are not approached in the same way or included in the main approach to FSM checks.

We don't do that mass sign-up in nurseries. Because, you know, I can't remember how many I said, but we haven't done that. Not least because there is that element of then, for a school-aged child, if they're free school meals, they're free school meals. For nursery-aged children, if we only check them, if they're morning and afternoon, we wouldn't be checking or wanting to identify people who don't meet the free school meals criteria.

LA 13

As described below, as LAs use free meals registration as an indicator of disadvantage which helps them choose how to target additional resources, this is also the case in terms of identifying pre-school age children who are disadvantaged and may benefit from other help that is available.

I did find 24 children in nursery. And I'm contacting the nurseries and the schools involved, and I have been forwarding that information on to the EYPP team. Because, there are other funding streams, like, I don't know, care vouchers or something like that. So, I don't want any of these families to miss out. So, those, I picked up 24 children that weren't known to anybody.

LA 12

²⁹ Cooper and Jiménez (2024) 'How can we reduce food poverty for under-fives?' <https://epi.org.uk/publications-and-research/how-can-we-reduce-food-poverty-for-under-fives/>

6. There are many limitations to using FSM as a primary measure for identifying disadvantage

FSM was used by LAs to identify families in need and target their resources, for example from the Household Support Fund.

So, for every child we identify, we just target our internal resources better to them. Which will be things that other authorities are doing, like from the Household Support Grant, looking at food vouchers, for example, during holiday times, and we still do that. From that grant, we do a holiday activity food programme eligibility. We do uniform support grants for children moving stages of school, so start of primary and secondary. We have a swim and leisure offer for children eligible for free school meals. So there's a whole host of local benefits, on top of...

LA 8

However, key issues raised in the interviews highlight some of the limits of FSM as a measure of disadvantage. Transitional protection, for some, brought into question the 'deservingness' of some FSM recipients, as potentially families still in receipt of FSM were now in a much better financial position. At the same time the income threshold for FMS was described as being too low and there were clearly families who were in need but did not qualify.

And it's like, speaking to a parent, you can hear it in their voice. It's like, "Oh..." You know, it's a bit of a shock, like, "What, I'm only getting £8,000 a year, but the threshold is £7,400?" It is bad, and I do recall talking to a lot of schools.

They were just like, "I don't believe it," and I said, "I don't like it." I thought, you know, it's just, "There's nothing I can do. I'm a government employee, I'm an officer," and it's just like, it is what it is, black and white. And there are times when we've done discretionary or gave some grace to some parents, to give them free school meals.

But, again, I'm not funding that. That funding comes from the schools' pocket, and it's almost like, I go back to the school, I said, "You need to have a conversation with your head teacher, governing bodies. Is there somewhere you could put your hands in your pocket, be there a risk, because parents may not be eligible for free school meals, so you won't be able to claw your money back? You know, you'll miss out."

LA 12

There are a lot of people that wouldn't meet... that would no way make- the free school meal criteria now, if they were to apply. So, I mean, you said at the beginning, free school meals is, like, a, sort of, deciding factor for poverty and things like that. I don't think it's an accurate one, but, you know ... there are people that were furloughed during lockdown and they've gone back now to, you know, a really well-paid job.

LA 4

So, you'd have a family unit where you're saying, "Well, actually, as a Free School Meal measure, only two of the four children in that family are meeting that deprivation. So, are they deprived, or aren't they?"

LA 1

Universal Credit, £7,240, is not a lot of money in this day and age, especially if you've got more than one child.

LA 3

The threshold hasn't changed. So, we've got a lot of people who are in food poverty, because that threshold hasn't kept up with the cost of living. But, transitional protection has helped in some of that, if those parents were- Like, during COVID, and it was one of those. So, once transitional protection goes, it will lose capturing those ones.

LA 10

The biggest change would be if they increase the threshold on UC, because that hasn't been increased since 2018, and we have more, and more, and more families missing out because they're £60, £70, £80 a month over the threshold.

LA 11

I have parents writing to me who are struggling on Universal Credit and I say, "You still don't meet the threshold. It's not a local authority [decision]"

LA 5

There are some parents that are on borderline FSM, cannot claim FSM, because they're just, maybe, teetering just over it. We know they should be FSM, as in they really are in great need.

MAT 4 school 2

Accordingly, schools themselves described their own approach to identifying disadvantage alongside FSM, basing this on need rather than FSM criteria necessarily, and using discretion in providing free meals and additional resources for children whose families appear to be struggling. However, it was also acknowledged that providing discretionary meals and other benefits of

course comes at additional cost to the schools which are already working within constrained budgets, as has been shown in other research.³⁰

Similarly, the school can come to me and go, “Actually, this family is really struggling.” I don't have the money to fix that, but the school does, so I can say to them... I can remind the school. The school have discretion, under the Education Act, to waive or reduce the charge for school meals, so they can apply that with their budget.

LA 1

We pay for five extra meals every day. The reason why we pay for five extra meals is the duty staff is usually the head, and deputy, and senior leadership team. When we see that that child has significantly woofed their meal down within seconds and they are hungry, we have the availability then to go and grab another meal for them and feed them.

We started this only... Is it April? We started this at the beginning of March because there were, significantly, quite a few children that were very hungry. I will say they were FSM children, so what we've done is we're giving them 2 meals when needed. Especially when they are Year 5 and 6, they're 9, 10 years old, they are getting hungry.

MAT 4 school 2

But any parent who would ever come and approach with a problem because they were in financial difficulty, whether they were free school meals or not, we would always try and meet a need as far as we could, because that's just the kind of culture that we have... It's always based on the need of any given circumstance at any given time. Our parents know if they need something, that they can ask. If they're asking, it's because they know they need it and we would know they needed it. Obviously, if there's a free school Pupil Premium element, we're going to know that the need is greater, but that doesn't mean that a family won't hit a financial crisis for one reason or another and need support in a different way.

MAT 4 school 1

The schools are still feeding them, but then there is that complexity around, “Are we going to just forego that finance even as schools are obviously not financially very strong at the moment? Or are we asking these parents that we know are vulnerable to then foot the bill because they haven't...?” So, there are layers. There are layers of things that... I don't think it's the most accessible way of getting it done.

MAT 2

³⁰ Child Poverty Action Group (2024) ‘The Cost of School Meal Debt’
https://cpag.org.uk/sites/default/files/2024-11/Cost_school_meal_debt.pdf

The barriers to registering for FSM described in Section 3 demonstrate that there are some FSM-entitled groups who are not currently registered for FSM, with some vulnerable groups at particular risk of not taking up FSM, such as families with NRPF.

So, we have a family that wasn't FSM, but there was such an enormous amount of need, but, due to the fact that they'd come to the country as immigrants and they'd just landed in the country, they couldn't get support for anything. So, we supported them with everything. We've had children from Ukraine and the rest of it, so we've had to support [them] and they're not FSM, but to us they still need support.

MAT 4 school 2

Finally, the FSM measure only relates to children registered in education – children missing from education is an increasingly concerning issue,³¹ and we have shown elsewhere that children missing periods of education are less likely to be registered for FSM despite meeting the family income and benefits criteria.³²

The issue of how we identify disadvantaged children and young people has significant implications for holding government to account on their experiences within and outside of education, so it is imperative that we find a solution. The announcement immediately before publication of this report that the Department for Education will cease transitional protections from summer 2026, and expand entitlement to FSM to all children in families claiming UC from September 2026 is a welcome development in terms of free meals being accessible in principle to a greater number of disadvantaged children, yet adds further complexity and urgency to the issue of how well FSM identifies disadvantage, particularly over time.³³ EPI plans to continue to investigate potential solutions over the coming year.

And yeah, children educated other than in school or at school, that's where the biggest kind of challenge and the change that came in, I think it was last year, wasn't it?... So the local authorities should – not must – but should make provision for those families kind of missing out on their free school meals because their child is not currently in a school and may never be in a school for whatever reason.

And I guess that's complex because it's not just- so for us, we have a fairly simple relationship with schools. Schools know the children and we notify the school and the school will query that with us. Whereas, for those children who aren't in a maintained school, it's much more

³¹ Crenna-Jennings, Joseph and Hutchinson (2024) 'Children Missing from Education' <https://epi.org.uk/publications-and-research/children-missing-from-education/>

³² Campbell with Cooper (forthcoming 2025)

³³ A government press release (sent by email June 4th 2025) titled 'Over half a million more children to get free school meals thanks to historic government action' noted, 'Transitional protections have been in place since 2018 to ensure no one who gained FSM eligibility would lose it while UC was rolled out. We are extending protections until the threshold is increased in September 2026.'

SEN-focused and it's a much more difficult relationship to, kind of- because we don't- as a free school meals team, we don't have any direct relationship with those families at all.

And whilst it's a bit, you know, it's us and schools and the parent, when there's no school as an intermediary, that's been quite challenging,

LA 13

As well as that, children who are not in education, either electively or been expelled, wanting some sort of compensation for the school meal that they should be able to take that they can't.

LA 2

And the other thing we're seeing a lot more of in free school meals is with the change in policy last year with EOTAS and schools having to support children with disabilities with vouchers and- because I did a whole new policy on the Education Otherwise Than At School. And we now do- we put a whole policy in place last year around supporting children who aren't in school with vouchers on a termly basis, based on the non-statutory guidance in the free school meal.

Actually, guidance which- but that opens up a can of worms because Section 61 of EOTAS is a very small amount of children, and there's lots of other children who have education outside of school that's not considered EOTAS, and they're like, "Well, my child's at home"... So, it's Education Otherwise Than At School. So, basically, they can't be placed in a school. But EOTAS itself, under Section 61, is a really tight criteria that they have to have no setting, a blank section I in their educational health and care plan. And basically, it means that there's no school, even as far as in the country, but certainly, within a reasonable distance, and that can be outside of county, who could meet the needs of that child.

LA 6

Conclusions and policy recommendations

Summary and conclusions

It is clear that LAs and schools are engaging in many activities to promote FSM registration, and in some cases dedicating significant time and resource to this end. There is still variation in LA approaches and policies, as well as school practices, which means the likelihood of a child entitled to FSM being registered as FSM may be unequal across different schools and areas. Some LAs have introduced local auto-enrolment to increase FSM registration, though there can be many challenges to initial implementation and once implemented this does not replace the other routes to FSM registration. Importantly, different characteristics of LAs make auto-enrolment more challenging for some. Many LAs described the significant resource required to set up local auto-enrolment.

In the case of free early years meals (FEYM) there is not just a difference in the processes for registration, but this national policy is actually being interpreted and implemented differently across areas, with some children therefore not having access to the free meals they are entitled to. In some areas the free meals policy is interpreted as not applying to early years as children are not in full-time education by definition; in others the policy is not seen as a statutory obligation. For some of the LAs we spoke with there are potentially free meals available in early years but this is hard to find out about in practice because the registration for these free meals is dealt with by a separate team. By contrast for other LAs early years is included in their main FSM team and therefore included in local auto-enrolment and their promotional activities.

Whilst changes over time both in terms of events (the Covid-19 pandemic), policies (e.g. the introduction of universal infant free school meals) and advancements in technology are likely to have led to increased efforts in FSM promotion and registration, there are still barriers to applying. Families with English as an additional language and those with no recourse to public funds are particularly vulnerable to missing out. There is still a stigma which makes some people reluctant to apply even when they are entitled. There is also confusion about entitlement, for example, in relation to universal infant free school meals and transitional protection. Significant efforts are made by LAs and schools to overcome these barriers, again with variation, and therefore these barriers seem to be bigger/smaller across different areas.

In terms of FSM as a measure of disadvantage, whilst it can be a useful way for LAs to target other resources towards disadvantaged families, it is clearly limited and has potentially become more limited in recent years. Whilst on the one hand, transitional protection means that with the FSM-registered population there will be some families who no longer meet the FSM eligibility criteria, at the same time the low income threshold which has not kept pace with inflation means that LAs and schools can see families in need, who would benefit from FSM but are not currently entitled. Schools are able to use different ways to identify need, based on their communications and relationships with families, and use their discretion to direct resources to help families in need, regardless of FSM eligibility, where school budgets allow, though this is more possible in some schools than in others. The issue of how we identify disadvantaged children and young people has significant implications for holding government to account on their experiences within and outside of education, so it is imperative that we find a solution.

The announcement immediately before publication of this report that the Department for Education will cease transitional protections from summer 2026, and expand entitlement to FSM to

all children in families claiming UC from September 2026 is a welcome development in terms of free meals being accessible in principle to a greater number of disadvantaged children, yet adds further complexity and urgency to the issue of how well FSM identifies disadvantage, particularly over time. EPI plans to continue to investigate potential solutions over the coming year.

Despite this expansion in FSM eligibility, without further action from the government children may continue to miss out on the free meals they are entitled to. The barriers to registration and differences in registration practices across LAs means children still face inequalities in access to free meals. The narrow targeting and patchy implementation of free early years meals (FEYM) means many pre-school children will be unlikely to benefit from this expansion in FSM eligibility.

Below we make two policy recommendations that if implemented would promote wider access to free meals in practice, not just in terms of entitlement.

Policy recommendations

1. Introduce a system of national auto-enrolment for FSM and FEYM

For many of the current difficulties with FSM and FEYM registration, auto-enrolment would provide a clear solution. The current system requires lots of effort and coordination from different actors – LAs, schools, nurseries, parents – and centralised auto-enrolment would ease this and allow LAs, schools and nurseries more time and resources to focus on other areas.

A national system of auto-enrolment would also remove inequalities in access to FSM across areas due to different FSM registration practices. In terms of barriers families face in applying to FSM – including English as an additional language, stigma, confusion about eligibility – auto-enrolment would largely eradicate these issues (though not entirely, as some families may still not apply for the welfare benefits that qualify eligibility for FSM).

Where LAs have implemented local auto-enrolment they have found significant impact in terms of additional children being identified as eligible and associated funding for schools. Therefore, although we do not have recent figures on the gap in FSM take-up, (the most recent estimates being from 2013³⁴), the preliminary findings from LAs make the case that national auto-enrolment would be an improvement on the current system(s) in place. They highlight that there is a gap in take up which is significant to those individual children as well as to schools for funding and LAs for identifying disadvantaged children that may benefit from other resources.

Auto-enrolment should be introduced nationally, rather than delegated to LAs, as we have found that the different levels of resources and characteristics make auto-enrolment more challenging for some LAs. In the current climate of constrained public resources there is a strong case to be made for improving the efficiency and equity with which national policies are implemented.

³⁴ Estimated as 11% in 2013 – see Lord et al (2013) ‘Pupils not claiming free school meals’ <https://assets.publishing.service.gov.uk/media/5a7b8bbaed915d414762113c/DFE-RR319.pdf>

For LAs to implement auto-enrolment this requires significant investment of time and resources and is an addition, rather than a replacement, to their other FSM registration practices, as they are not able to implement this in a way that is fully automatic, but rather need to run auto-enrolment as a repeat exercise. A centralised auto-enrolment process would need to be immediately responsive so FSM-entitled children are identified as soon as their circumstances change and they meet the eligibility criteria. This will become even more important when transitional protections end as there will be much more frequent changes in families' entitlements to FSM.

There are additional complications to implementing auto-enrolment at the LA level, including children attending schools in a different LA to where they live, children in MATS that are not signed up to the LA checking service and children moving schools.

A national system of auto-enrolment could also increase the uptake of free early years meals (FEYM) which is sometimes not included in LAs' main approach to FSM registration, despite being part of the same FSM legislation.

In terms of FSM as a measure of disadvantage, this would be improved by a national auto-enrolment approach, not only due to removing gaps in registration, but also through improving identifications of disadvantaged children when not attending school or not accessing nursery – whether or not this identification would be linked to a free meal. The invisibility of some groups of children who do not attend school has increasingly been recognised as problematic in recent years, so picking up some of these children through auto-enrolment is a potential additional advantage of centralising the process.

Any national auto-enrolment system would need to ensure the inclusion of families with no recourse to public funds, who have a different set of eligibility criteria and currently face significant barriers to FSM registration. It is however also important to recognise that coverage, while better, would not be complete, because some families do not register for the welfare benefits they are entitled to, and will not be signed up for Universal Credit.

2. Clarify the free early years meals (FEYM) policy and support nurseries to provide free meals to all children who meet the free school meal eligibility criteria

Although children who meet the FSM eligibility criteria and attend a maintained nursery before and after lunch are entitled to receive a free meal there is some confusion over this policy, with some LAs interpreting it as not applying to nursery children and others interpreting this policy as optional. Government should clarify this national policy for all maintained nurseries to ensure all LAs and nurseries understand the obligations of providing a free meal to entitled children.

For this policy to be meaningfully implemented the guidance to LAs and maintained nurseries should support them in how to meet this obligation where the maintained nurseries do not have kitchen facilities. It should also clarify obligations where settings only operate in the morning or afternoon.

Government should also remove the before and after lunch criteria, which makes auto-enrolment processes more complicated for FEYM.

Government should provide funding for settings to offer the meals, otherwise the associated increase in children eligible for FEYM will add more financial pressure to the already challenging situation settings are operating within. Unlike schools who receive funding for FSM (separately from Pupil Premium funding), nurseries are expected to meet the cost of the free meals within existing budgets, which is a clear barrier to providing the free meals.³⁵

FEYM should be included within the centralised auto-enrolment we recommend above. Additionally, whilst the priority is to register all entitled children, which is currently restricted to children in maintained nursery settings, ultimately children who meet FSM criteria should have access to a free meal regardless of the type of setting they attend. Given the upcoming expansion of FSM entitlement this means expansion of FEYM to all children attending early education whose family is in receipt of Universal Credit. Otherwise, the youngest children, who are at highest risk of poverty, will not benefit from the recent expansion in FSM eligibility. Again, expansion of the entitlement must be accompanied by funding to enable settings to provide the meals.

As we have shown elsewhere far fewer children are registered for FEYM compared to children registered for FSM in primary school, with 8 per cent of children attending maintained nurseries registered for free meals compared to 18 per cent of children in reception.³⁶ Recent research suggests there could be more than 300,000 pre-school children living in poverty and attending formal childcare yet not eligible for FEYM due to multiple factors including the narrow targeting of the policy.³⁷ This is particularly concerning because poverty rates and food poverty rates are higher amongst pre-school children,³⁸ and so there is a problem of unmet need for pre-school age children specifically.³⁹ Acting on the above recommendations would begin to address this imbalance in support for pre-school children.

³⁵ Furthermore, nurseries do not have the same financial incentive as schools to maximise FSM registration as Early Years Pupil Premium is not contingent on FSM eligibility (unlike in schools) and is paid at a much lower rate (up to £570 per year for nurseries compared to £1,515 per year for primary school children). Enabling settings to provide the meals by funding the policy is therefore vital.

³⁶ Campbell (2025) 'Who has been registered for free school meals and pupil premium in the National Pupil Database?' <https://epi.org.uk/publications-and-research/who-has-been-registered-for-free-school-meals-and-pupil-premium-in-the-national-pupil-database/>; Cooper (2024) 'How can we reduce food poverty for under-fives?' <https://epi.org.uk/publications-and-research/how-can-we-reduce-food-poverty-for-under-fives/>

³⁷ Food Foundation (2025) 'Boosting early years nutrition to support a healthy childhood' https://foodfoundation.org.uk/sites/default/files/2025-5/TFF_Early%20years%20report_2025.pdf

³⁸ Cooper (2025) Ibid

³⁹ There is also an inconsistent approach in education policy with free meals being prioritised for the youngest school children (via universal free school meals for all children in reception to year two), in recognition of the importance of 'boosting attainment early', whilst the youngest children, not yet in school, have the most restricted access to free meals.

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Appendices



Appendix 1: Freedom of information request

Freedom of Information request to Department for Education, 'Frequency of checks by local authorities using the Eligibility Checking System from 2001 to present' available at https://www.whatdotheyknow.com/request/frequency_of_checks_by_local_aut#incoming-2666070

This data is from the eligibility checking system which is a tool made available by the government to local authorities so they can check pupils' eligibility for FSM by submitting their parents'/carers' details. As we discuss in our evidence review this can also be used to make batch re-checks – where multiple people's details are re-submitted to re-check eligibility. We know that some LAs, such as Newham⁴⁰, do these batch re-checks frequently to quickly capture any newly eligible pupils. We are therefore interested in the number and frequency of re-checks as we expect this to be related to under-registration rates - LAs that re-check more frequently are more likely to have a lower under-registration rate.

We requested the data for the most recent available year (2023) and the oldest year available still (2018) with the number of checks broken down by LA and by month. It is not possible to get this data by week. We focus on total number of checks. We have no way of distinguishing re-checks from original checks.

The number and frequency of checks has increased from 2018 to 2023 with the majority of LAs running checks every month in 2023. There are a few outliers who still run checks for only one or two months in 2023 and two LAs listed as running no checks.

Note the number of LAs we have data on from the ECS is 153.

Figure 1 shows that in 2023 it became much more common for LAs to use the ECS checker every month. An important caveat to this based on what we know from the interviews is that this does not mean that the majority of LAs run re-checks every month – this includes ad hoc checks for new individual applications. Therefore, the more frequent use of the ECS could be due to more frequent changes in circumstances/more new applications throughout the year (potentially related to the introduction of Universal Credit) or more frequent re-checks.

Figure 2 shows that in 2018 there was a clear peak in the number of LAs running checks in September – the start of the school year – but the number of LAs running ECS checks is much more evenly spread across all months in 2023.

⁴⁰ <https://www.newham.gov.uk/school-meals-newham/free-school-meals/2>

Figure 1. Number of months the ECS checker was used

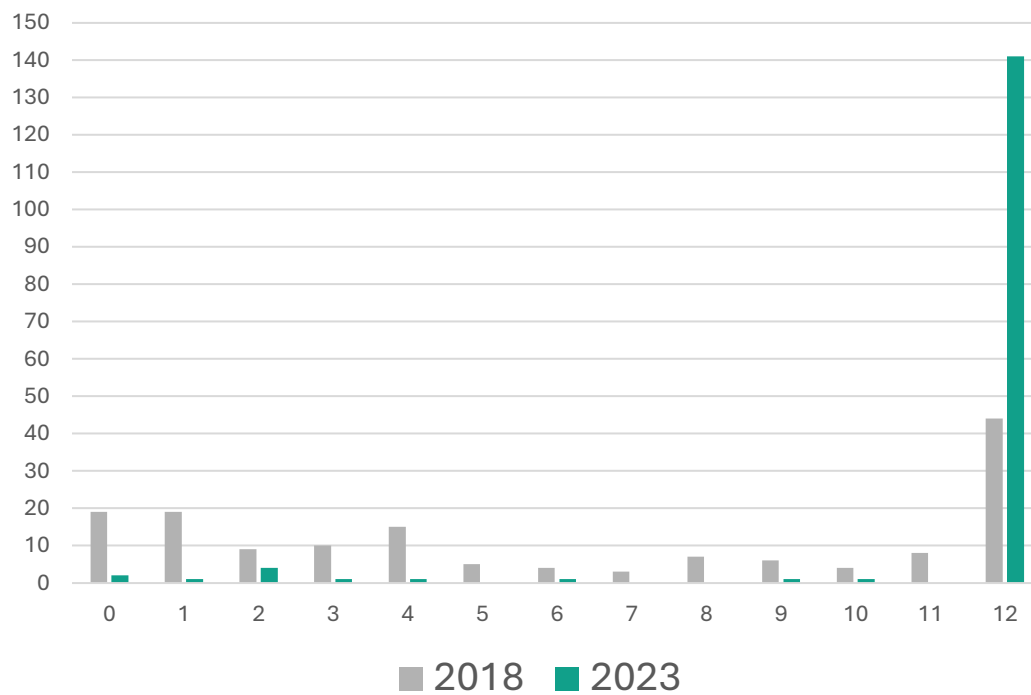
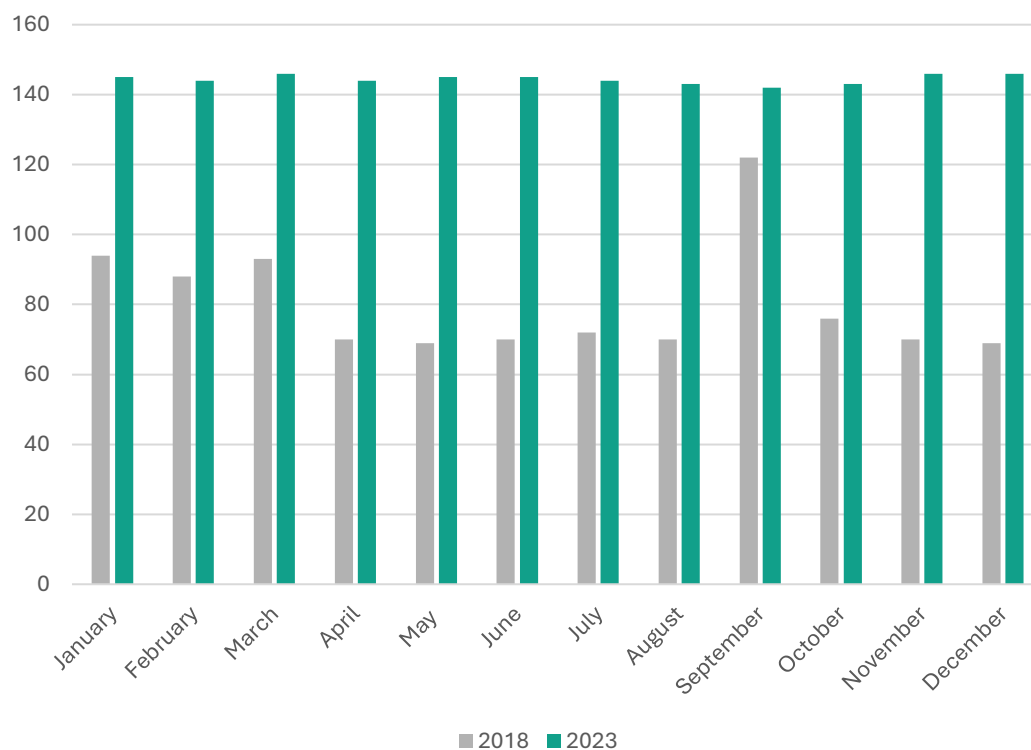


Figure 2. number of LAs running ECS checks by month



Appendix 2: Survey to local authorities and multi-academy trusts

A separate survey was shared with local authorities (LAs) and multi-academy trusts (MATs) in 2024. We contacted every LA inviting them to complete the survey and shared the survey in the Local Government Association newsletter. We invited a random sample of 149 MATs to complete the survey.

The survey was sent via a Smart Survey link as well as a word document based on feedback during pilot surveys that LAs would find it easier to use a word document. In practice the majority of LAs and MATs used the word document as they sometimes required input from multiple departments.

LAs from all regions responded to the survey, with the largest proportion of responses from London, the South East and the North East.

Table 1 Local authority surveys by region

Region	Response Percent	Response Total
London	18.5%	10
South East	14.8%	8
North East	13.0%	7
Yorkshire and the Humber	11.1%	6
East of England	9.3%	5
North West	9.3%	5
West Midlands	9.3%	5
East Midlands	7.4%	4
South West	7.4%	4
		54

17 MATs responded to the survey from almost every region – missing the North East and East Midlands. Also note some MATs had schools across multiple regions.

Survey questions are available from the authors upon request.

Appendix 3: Qualitative interviews

This research was exploratory and focused on understanding processes which lends itself to a qualitative approach. Semi-structured interviews were conducted in early 2025 with 14 local authorities and 4 MATs (including 2 schools from the same MAT).

On average interviews lasted one hour and most were with individuals but two were with two co-workers. All interviews took place online via Teams and were recorded and anonymously transcribed before being thematically analysed in NVivo using both inductive and deductive coding.

Interview participants were contacted via survey participants in addition to contacting additional MATs as it proved more difficult to recruit MATs for interviews.

The final sample of those who completed interviews includes LAs from almost every region in England and with a mix of characteristics that are relevant to the focus of the research, including proportion of children registered for free school meals (FSM), proportion of children with special educational needs and disabilities (SEND) and proportion of children with English as an additional language (EAL). Whilst there is even greater variation in characteristics at the local authority level Table 2 below show characteristics by region to avoid disclosive details which may make local authorities identifiable.

Table 2 Interviews by region and selected characteristics

Region	No. of interviews	% registered FSM	% EAL*	% White British	% SEND**
London	4	28%	44%	23%	18%
South East	2	21%	16%	67%	19%
North East	1	33%	9%	83%	20%
Yorkshire and the Humber	1	28%	18%	68%	18%
East of England	2	21%	17%	66%	18%
North West	0	29%	18%	70%	19%
West Midlands	1	30%	23%	56%	19%
East Midlands	2	25%	18%	68%	17%
South West	1	21%	10%	80%	20%
Total	14				

Notes: Data is based on Department for Education Statistics for 2023/24; *Percentage English as an additional language; **Percentage of pupils with special educational needs and disabilities based on combined total percentage of pupils with EHC plans and SEN support without EHC plans.

Topic guides for interviews are available from the authors upon request.