

Registration for Free School Meals (FSM): issues and implications for research, policymaking, practice and access

Main public output



**Dr Tammy Campbell,
Dr Kerris Cooper,
and Allen Joseph**

October 2025

About the Education Policy Institute

The Education Policy Institute is an independent, impartial research institute that promotes quality education outcomes, regardless of social background. We achieve this through data-led analysis, innovative research and high-profile events. <https://epi.org.uk/>

Acknowledgements

Thanks to our advisory group, to all those who have provided feedback, comments and advice throughout this project, and to those who organised, presented at and facilitated our deliberative event, including:

Jake Anders, Jon Andrews, Kate Anstey, Alice Bradbury, Maria Bryant, Georgina Burt, Dayna Brackley, Myles Bremner, Jonathan Capstick, Claire Crawford, Whitney Crenna-Jennings, Daniel Edmiston, Tilda Ferree, Ella Green, Jacalyn Guy, Timo Hannay, Emily Hunt, Jo Hutchinson, Sonia Ilie, John Jerrim, Allen Joseph, David Laws, Helen McGlade, Selena McGuinness, Sundus Mahdi, Ruth Maisey, Sarah Maughan, Beatrice Merrick, Owen Mooney, Rosie Osborne, Abigail Page, Natalie Perera, Birgitta Rabe, David Robinson, Dave Thomson, Sam Tuckett, and Ellen Wright.

Thanks to all who attended and participated in our deliberative event. Thanks to the local authorities, multi-academy trusts and schools who took the time to fill in our survey – often with input from multiple departments – and engage in interviews, as well as sharing useful information, collecting their own additional data and responding to follow up questions. Thanks to the Local Government Association for sharing their insights on local auto-enrolment and sharing our survey as well as the Department for Education and Eligibility Checking System team for responding to multiple queries and sharing information. Thanks to Joni Kelly for research assistance. Thanks to Jon Andrews for proofreading and editorial comments, and to Amber West and Rebecca Ferdinand for proofreading.

The Nuffield Foundation is an independent charitable trust with a mission to advance social well-being. It funds and undertakes rigorous research, encourages innovation and supports the use of sound evidence to inform social and economic policy, and improve people's lives. The Nuffield Foundation is the founder and co-funder of the Nuffield Council on Bioethics, the Ada Lovelace Institute and the Nuffield Family Justice Observatory. This project has been funded by the Nuffield Foundation, but the views expressed are those of the authors and not necessarily the Foundation. Find out more at: <https://www.nuffieldfoundation.org/>

Bluesky: @nuffieldfoundation.org

LinkedIn: Nuffield Foundation

Please see Annex A for data citations and acknowledgements.

About the authors

Dr Tammy Campbell is Co-Director for Early Childhood and Wellbeing at EPI. Previously she completed a British Academy Postdoctoral Fellowship based in LSE's Centre for Analysis of Social Exclusion (CASE). She remains a Visiting Senior Fellow at CASE. Her PhD in Quantitative Social Science for Social Policy was awarded in 2016 by the UCL Institute of Education, and she also holds degrees in Policy Analysis and Evaluation, Psychology, and Philosophy.

Pre-PhD, Tammy was a Government Social Researcher, in the (then) Department for Children, Schools and Families; before that, she worked with children and young people. Tammy's interests span the social, structural, educational, political and psychological processes shaping young lives. Her research has included investigations of inequalities and experiences in the pre-school years, 'ability' grouping, bias and stereotyping in assessment, the part played by 'faith' schools in stratification, the workings of the system intended to serve children with special educational needs and / or disabilities, and peer effects.

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

Dr Kerris Cooper is Senior Researcher, Early Years and Inequalities at EPI. She previously worked at the Centre for Analysis of Social Exclusion (CASE) at the London School of Economics (LSE), where she is currently a Visiting Senior Fellow. Kerris has over ten years of research experience focused on poverty and inequalities, covering many topics including the causal effect of income on children's outcomes, the role of social security policies in mitigating or exacerbating inequalities, changes in the attitudinal context for policy-making and gendered data gaps in violent crime statistics.

Kerris' expertise relates to childhood inequalities in particular and in 2017 she completed a PhD in Social Policy at the LSE, exploring the relationship between poverty and parenting in the UK and the role of mothers' mental health. Kerris holds a First Class Honours degree in Combined Social Sciences from Durham University and an MSc in Social Policy (Research) with Distinction from the LSE.

Allen Joseph is a researcher in the Early Years, Inequalities and Wellbeing at EPI. He joined the Education Policy Institute in September 2022 following an undergraduate research internship in July 2021. He has also worked as a research assistant at the Department of Education, University of Oxford evaluating a language intervention. Allen graduated with a degree in psychology from the University of Bath.

Contents

About the Education Policy Institute	2
Acknowledgements	2
About the authors	3
Contents	5
Executive summary	7
Introduction	7
Previous evidence and discussion on the free school meals (FSM) measure in the National Pupil Database (Section 1)	7
New analyses of the National Pupil Database and Households Below Average Income data exploring who has been registered for free school meals and pupil premium (Section 2)	8
New analyses of the Millenium Cohort Study: characteristics, experiences and outcomes of children registered – and not registered – for free school meals (Section 3)	10
How do free school meals registration practices differ across place and time? (Section 4) ..	12
What can we learn from other countries? International approaches to identifying socio-economic disadvantage in education systems (Section 5)	14
Views from experts: messages and ideas from a deliberative event on uses of FSM and possibilities for the future (Section 6)	15
Next steps and recommendations (Section 7)	17
Final recommendations and suggestions that have arisen throughout the research including our deliberative engagement across the project with others working in this area are:	19
Introduction	23
Section 1: Previous evidence and discussion on the free school meals (FSM) measure in the National Pupil Database	26
Section 2: New analyses of the National Pupil Database and Households Below Average Income data exploring who has been registered for free school meals and pupil premium	31
Key messages and implications from this output	31
Recommendations	34
Discussion points	36
Section 3: New analyses of the Millenium Cohort Study: Characteristics, experiences and outcomes of children registered – and not registered – for free school meals	38
Key findings from this output	38
Recommendations and next steps	42
Section 4: How do free school meals registration practices differ across place and time? Research with local authorities and schools	45

Section 5: What can we learn from other countries? International approaches to identifying socio-economic disadvantage in education systems	52
There is wide variation in how socio-economic disadvantage is conceptualised	52
There is wide variation in how socio-economic disadvantage is measured	54
The quality and completeness of data affect how disadvantage is captured	56
Section 6: Views from experts: messages and ideas from a deliberative event on uses of FSM and possibilities for the future	60
Issues with FSM as a measure	61
Use of FSM in research	62
Use of FSM in accountability and schools	62
Use of FSM in funding	63
Conflicting uses, tensions, and lack of clarity	63
Alternative ways to measure disadvantage	64
2026 and beyond: time for a complete reset?	66
Auto-enrolment for FSM	67
Section 7: Next steps and recommendations	71
What might replace FSM as a measure?	71
Outstanding policy issues	75
References	78
Annex A: Citations and acknowledgements for all data used throughout project	83
National Pupil Database	83
Households Below Average Income	83
Millennium Cohort Study and linked National Pupil Database	83
Annex B: Summary table of reviewed countries	85

Executive summary

Introduction

This project explored the free school meals (FSM) measure in the National Pupil Database, and its use in research, policymaking, and practice.

For years, FSM has been a core measure of child and family circumstances, used by analysts and academics, within government, by services and practitioners, and within schools. It has been used to identify children for targeting and interventions, to allocate funding and resources, to evaluate policies and educational systems, and for accountability purposes. It has been used to proxy disadvantage, deprivation, and family circumstances in research.

Given the prevalence and multidimensionality of the uses of FSM, including for many high-stakes purposes, it is important to understand it more deeply as a measure. Ever since individual-level data on FSM has been collected and made available for these many purposes (in the early 2000s), researchers concerned with accurate data have questioned FSM's validity and reliability. Our project follows in this tradition.

During the project, we reviewed and synthesised the history of the FSM measure and its uses. We investigated which pupils and families are represented by FSM, and how this changes over age, stage, time, and place. We explored how identification as FSM-eligible relates to school attainment and pupils' experiences within education. We explored the means by which children are identified and recorded as FSM-eligible, and how this varies by place and has changed over time.

We briefly scanned approaches to conceptualising and identifying socio-economic disadvantage in other countries, and we held a deliberative event with attendees from varied backgrounds, including central and local government; governmental agencies; universities; research and policy organisations; charities and lobby groups; and education unions. During this event, participants discussed what alternative and complementary measures may be useful or desirable alongside or instead of FSM, and their feasibility.

Previous evidence and discussion on the free school meals (FSM) measure in the National Pupil Database (Section 1)

We reviewed, synthesised and discussed existing evidence on the evolution of the FSM measure, over the past two decades, and on its uses, including in the pupil premium (PP). We also explored

the strengths and weaknesses of FSM and PP as measures for identifying disadvantaged pupils in research and policymaking.

We found that, as well as individual-level family income poverty, registration of children for FSM depends on numerous aspects of the context and time in which they live. This means that the composition of the group denoted FSM in the NPD varies and depends to some extent on these factors. The extent and types of disadvantages experienced by children recorded as FSM-eligible have differed over the years, in line with the changing contextual conditions and requirements for entitlement.

The evidence that we reviewed also indicates that, over time, procedures for identifying children as ‘free school meal-eligible’ have increasingly dissociated from practices and decisions in terms of providing actual free school meals. This was emphasised by our findings through the rest of the project. Furthermore, our review found that children registered for FSM receive very different support and interventions depending on the area in which they live.

New analyses of the National Pupil Database and Households Below Average Income data exploring who has been registered for free school meals and pupil premium (Section 2)

We used records spanning all children in pre-school, primary, and secondary state education from 2003 to 2023, who are included in the National Pupil Database (NPD). We also made comparisons to poverty estimates from the Households Below Average Income (HBAI) dataset, derived from the Department for Work and Pensions’ Family Resources Survey.

We looked at levels of registration (and under-registration) for FSM over time and by age-group; at compositional changes to the groups of children flagged as FSM-eligible and PP; at patterns of registration for FSM throughout school careers; and at how FSM compares to area-based measures of income deprivation (IDACI). We also look at measures of low-income in the pre-school years.

Our findings include indications that:

- The proportion of children recorded as FSM-eligible in the NPD has risen since 2018 (from 14 per cent to 25 per cent), and the composition of the FSM group is now more diverse in terms of current family circumstances.
- Overall, across time, fewer children are registered for FSM than are estimated to be in poverty.

- Under-registration of eligible pupils is not equally distributed across areas and pupil groups, so FSM/PP are a better proxy for poverty and educationally-relevant disadvantage in some areas than in others, and for children of some ethnicities and language backgrounds than others, and for children of some ages rather than others.
- Estimated poverty rates far exceed the percentage of children registered for FSM and PP within some ethnic groups (but not others). For example, 55 per cent of reception/key stage one children recorded as of Pakistani or Bangladeshi ethnicities were estimated to be in poverty, while only 16 per cent were FSM-registered. 16 per cent of children of the same age recorded as White were also FSM-registered, but far fewer – 22 per cent – estimated to live in poverty.¹
- Children in London were much less likely than most other regions to always be registered for FSM at every point during primary and/or secondary school, despite London's overall child poverty rates being high. For example, among pupil premium children in year 11 in 2023, 18 per cent in London had always been FSM registered, throughout their schooling, compared to 29 per cent in the North East.
- There were vast differences between local authorities and schools in the number of times children who were registered for pupil premium had been registered for FSM. In some schools, for example, only 1 per cent of pupil premium students had always been registered for FSM, each year. In others, 99 per cent of pupil premium students had always been registered for FSM – suggesting deeper and more permanent poverty. Some local areas and schools are treated as serving a relatively more (dis)advantaged population than they actually cover, because pupil premium eligibility only requires a child to be FSM-registered once.
- The more frequently a child is registered with a state school, the more likely they are ever to be registered for FSM. That is, when children have multiple periods missing from education, or non-enrolment, they are less likely to be FSM-registered in the periods that they do attend school. This suggests that children whose lives are more transient and who have less stability and continuity of contact with the education system are less likely to access the services and provisions to which they are entitled.

¹ 2019 estimates (the latest year for which we had robust pooled poverty estimates; additional years available in full paper). Poverty here is anchored poverty after housing costs.

- Very few nursery-aged children are registered for FSM, despite higher rates of poverty and food insecurity among families with children of this age.

New analyses of the Millenium Cohort Study: characteristics, experiences and outcomes of children registered – and not registered – for free school meals (Section 3)

We analysed the national Millennium Cohort Study to address the following questions:

- What can we learn about the characteristics, in terms of key home and family factors known to be related to (dis)advantage and child development, of children who are not registered for FSM when they meet eligibility criteria and are entitled to be registered?
- How does registration and identification as FSM-eligible relate to children's experiences within the school system?

We found that:

- At most time points, the majority of MCS children living in poverty² were not even entitled to be FSM-registered. This is because criteria are stringent and income thresholds for registration low.
- The more times a child is not enrolled in a state school, and 'missing from education,' the less frequently they are registered for FSM. But there is little relationship between number of enrolments and poverty. Children who miss periods of education and are enrolled for fewer years are less likely to be registered for FSM when entitled to be – but they are similarly likely as those who are enrolled more often to be in long-term poverty.
- A fifth of MCS sample children in very disadvantaged families who meet criteria for FSM eligibility at both the primary and secondary stages are not consistently registered at both stages: suggesting substantial unmet need and a system not working as intended.
- According to many key family factors and factors important in the home environment surrounding a child, those registered for FSM seem to be the most disadvantaged, followed by those who are entitled but not registered, followed by those not in poverty.
- According to other home and family factors playing an important part in children's environment, expereinces growing up, and development, the main pattern is of a stark

² According to the measure in the MCS, which is receiving 'less than 60 per cent of median equivalised family income,' and is 'derived from the aggregate income of the MCS families.' <https://cls.ucl.ac.uk/wp-content/uploads/2017/07/Millennium-Cohort-Study-Initial-findings-from-the-Age-11-survey-Full-report-WEB-VERSION.pdf>

difference between those families not in poverty and the rest: both children in poverty registered for FSM when entitled, and those in poverty but not registered when entitled.

- At all ages, a striking pattern is a relationship between registration for FSM when entitled and both the percentage of pupils within a child's school FSM-registered, and the income deprivation level of their local area.
 - With statistical controls, it is the percentage of pupils within a child's school who are registered for FSM that seems most important. The more peers registered within their school, the more likely an entitled child is to also be registered for their entitlement.

We also found:

- Children in the MCS sample who are registered for FSM consistently fare worst throughout their educational careers across different aspects of their schooling experiences and in both the primary and secondary phases, in terms of:
 - Their feelings about and reported experiences of school.
 - Their self-esteem, efficacy and expectations.
 - Their teachers being more likely to judge them unfavourably, and to hold lower expectations for their progress.
 - Their academic attainment.

By the time they take their GCSEs, 73 per cent of the sample who are FSM-registered do not attain the key threshold of five subjects at C/grade 4 and above (including English and maths). This compares to 57 per cent of those children who are not registered for FSM though they meet eligibility criteria, and are entitled to be registered; 57 per cent of other pupils in poverty; and 32 per cent of those not in poverty.³

These negative experiences throughout schooling seem particularly pronounced for the FSM-registered group, including when they are compared to other children in poverty and those who meet registration criteria but are not signed up. This suggests a specific 'FSM penalty'.

³ Unattenuated estimates. Controlling for earlier cognitive tests and Key Stage Two scores (and therefore focussing on differential progress only at the secondary age), we estimated that 59 per cent of FSM-registered children do not meet this threshold, 50 per cent of those FSM-entitled but not registered; 51 per cent of other children in poverty; and 38 per cent of those not in poverty.

How do free school meals registration practices differ across place and time? (Section 4)

This strand of the 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 strand was 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.⁴ Fieldwork took place in 2024 and early 2025. We found:

- Local authorities and schools invest in a **range of approaches to maximise FSM registration**, though there is still **variation in FSM registration practices**. This means that 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 parents needing to proactively make a direct application with the LA, to schools collecting the required information from all parents/carers en masse for FSM checks through the LA using the Eligibility Checking Service, to data-matching auto-enrolment processes coordinated by LAs without the need for parents/carers to share information.⁵ 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, whilst in others parents are required to reapply if their circumstances change. There are also different incentives across schools and LAs for families to apply for FSM (for example, some offer vouchers for food during school holidays; some do not). These differences in registration practices inevitably lead to differences in levels of registration.
- Despite increased efforts to maximise registration there are still **barriers for parents/carers applying for FSM**.
 - These include **language barriers** for parents/carers with English as an additional language, **stigma** which makes some parents/carers reluctant to apply, and lack of

⁴ 54 LA responded to our survey, which included both closed and free text questions; 17 MATs responded; and we interviewed 14 LA and 5 MAT staff.

⁵ See here for an example of resultant ‘opt-out’ process: <https://policyinpractice.co.uk/case-study/fsm/>

digital access and IT skills. In addition to these barriers, families with **no recourse to public funds** face additional challenges in registering for FSM: the application process is far less straightforward; government guidance was perceived as less clear for this group; and some families with NRPF were worried that applying for FSM might jeopardise their asylum case (though it should not).

- Where LAs implement **local auto-enrolment** this is usually **resource-intensive** and in addition to rather than in place of existing approaches to FSM registration.
 - Setting up local auto-enrolment often requires input from staff across multiple teams, legal considerations related to data protection and potentially practical difficulties with data matching. These are greater for some LAs than others depending on their characteristics (e.g. in terms of internal structures, administrative systems and staffing) and available funding.
- **Changes over time have influenced FSM registration practices.**
 - Significant events (such as the Covid-19 pandemic) and policy changes (such as the introduction of universal infant free school meals) have impacted how LAs and schools approach FSM registration. These changes in registration practices, along with the events and policy changes, mean that at different points in time it has been easier/more difficult and there have been varying levels of incentives to register for FSM.
- The current **low income threshold** makes FSM **less meaningful as a measure of disadvantage** because it excludes a significant proportion of families in poverty.
 - LAs and schools stated that the commonly identified children who were in need and would benefit from FSM but were not registered or did not meet the eligibility criteria.
- **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 were not aware that 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. The inconsistent implementation of this policy is particularly problematic given that pre-schoolers are more likely to be living in poverty and are at a critical period of development.

What can we learn from other countries? International approaches to identifying socio-economic disadvantage in education systems (Section 5)

In this section we review developments across a number of OECD countries, including both national and subnational systems, and concentrated on the primary and secondary phases of education. We examined how different systems identify disadvantaged pupils.

We find a wide range of approaches and measures (see Annex B), varying across key dimensions:

- Whether measures are unidimensional or multidimensional.
 - For example, in the United States, school funding allocations rely largely on census-derived estimates of the proportion of children living in poverty, while in New Zealand, an ‘Equity Index’ spanning dozens of factors including parental qualifications and age, contact with social services, residential mobility, and national background – as well as family income-level – is used.
- Whether measures are concentrated at the individual or the local level.
 - This also varies over time, within place. For example, the Netherlands previously included school area neighbourhood characteristics in its composite indicator but later removed them, having found that they contributed little explanatory value.
- Whether self-reported or administrative data is used.
 - Though here there are also shades of grey: several countries use census data, which is administrative, but which contains self-reported components.

We found that there are numerous trade-offs and judgement calls to be made in determining the best (or least bad) measure to use, balancing considerations including precision, practicality, and privacy. Ultimately, our brief review of the international evidence did not point to any one optimal system; instead, it highlighted the limitations (and to some extent, the strengths) of many

countries' approaches, and the tensions between theoretical conceptualisations of disadvantage and social position, data collection in practice, and public acceptability.

Views from experts: messages and ideas from a deliberative event on uses of FSM and possibilities for the future (Section 6)

Section 6 summarises ideas from our end-of-project deliberative event, held at the Nuffield Foundation in July 2025. We invited expert researchers, policymakers and practitioners to discuss the issues raised throughout our work, and in that of others also exploring the use of FSM and associated topics, and to imagine next steps. All presentation slides from the event can be found here: <https://epi.org.uk/wp-content/uploads/2025/07/Nuffield-FSM-Event-Slides.pdf>

Participants shared wide-ranging and often conflicting views across themes including:

- Use of FSM in research
- Use of FSM in accountability and schools
- Use of FSM in funding
- Conflicting uses, tensions, and lack of clarity
- Alternative ways to measure disadvantage
- Next steps and challenges in 2026 and beyond
- Auto-enrolment for FSM

Some of the main points arising during the event included:

- Contentions that the longstanding focus on FSM as a key unidimensional measure has hidden or minimised other factors crucial to educational attainment and wellbeing, and that it can consequentially 'drive policy' in an inefficient way.
 - Though others argued that FSM does have reliable predictive / explanatory value, and therefore use at the high level in policymaking, research, and funding allocation.
 - While others argued that it is unfair to use FSM at the lower level, e.g. to compare schools based on similar numbers of FSM pupils, because so much of importance is not captured by FSM alone
- Contentions that FSM should not be used as a measure without also accounting for ethnicity, language background, and area deprivation – because its predictions vary with these factors.

- Discussion of the fact that provision and take-up of meals is becoming ever more disconnected from registration of children as FSM-eligible, thus muddying the meaning and use of the measure.
 - Alongside suggestions that the use of FSM registration records for other purposes can actually get in the way of providing food and tackling hunger
 - As well as indications that the frustrations of the frontline staff within education and health sometimes conflicted with the frustrations of the researchers at the deliberative event
- Discussion of the pros and cons of individual-level vs area-level measures:
 - Such as the individual-level Pupil-Parent Matched Data under development by the Department for Education, or, alternatively, pupils' prior attainment.
 - Such as the area-level Indices of Multiple Deprivation, or census-based area portraits.
 - Also of combinations of the two (such as amalgamating the local-level Income Deprivation Affecting Children Index with individual-level FSM).
- Discussion of public perceptions and social desirability of different approaches, and the extent to which they may be accepted or rejected by the voting public.

Some participants also questioned the very premise that there is a robust or desirable way forward in terms of usefully measuring educationally relevant disadvantage. Several contended, for example, that concerns about fair distribution of resources to schools only arise because so many other aspects of the education system result in an uneven distribution of pupils with different characteristics, and that tackling this of itself would result in a 'more even playing field.' Others suggested that concerns about distribution would be alleviated by introducing more universalism into the school day, including blanket provision of meals.

To some extent there was a resignation among participants and for some a sense that the challenge of accurately and usefully conceiving and measuring disadvantage for educational policymaking was insurmountable. There was also some cynicism about the extent to which more accurate data would actually be utilised by government, given the ways that multiple agendas, ideologies, and political, economic and social forces drive policymaking and implementation.

Next steps and recommendations (Section 7)

Lastly, in Section 7, we propose next steps and highlight outstanding policy recommendations arising from this project. Particularly, we focus on the challenge to consistency of FSM as a measure that has arisen over recent years and will potentially come to a sharp cliff edge in 2026, due to announcements this year that transitional protections and legacy FSM-eligibility will cease, while all families in receipt of Universal Credit will become entitled to FSM (see Table 1).⁶ We discuss possible approaches to developing a relatively stable conceptualisation and operationalisation of educationally relevant ‘disadvantage,’ including using combined individual-level indicators of a child ever being registered for FSM, and area-based indicators of deprivation.

⁶ <https://www.gov.uk/government/publications/free-school-meals-expansion-impact-on-poverty-levels/free-school-meals-expansion-to-all-children-on-universal-credit-impact-on-individual-and-child-poverty-levels-and-number-of-children-in-households-r>

Table 1: Changes to FSM and pupil premium entitlement criteria over the transition period to 2026 and beyond

Jan 2023	Jan 2024	Jan 2025	Jan 2026	Jan 2027	Jan 2028
<i>Who can be registered as eligible for / is entitled to means-tested FSM (and therefore can appear as FSM-registered in the National Pupil Database)</i>					
Those receiving a qualifying legacy benefit (income support etc)	Those receiving a qualifying legacy benefit (income support etc)	Those receiving a qualifying legacy benefit (income support etc)	Those receiving a qualifying legacy benefit (income support etc)	Everyone currently on UC	Everyone currently on UC
Those on UC with income less than £7,400	Those on UC with income less than £7,400	Those on UC with income less than £7,400	Those on UC with income less than £7,400		
Those who have met the above criteria at any point since April 2018 (5 year period)	Those who have met the above criteria at any point since April 2018 (6 year period)	Those who have met the above criteria at any point since April 2018 (7 year period)	Those who have met the above criteria at any point since April 2018 (8 year period)		
Children in families with no recourse to public funds, who meet specific income thresholds	Children in families with no recourse to public funds, who meet specific income thresholds	Children in families with no recourse to public funds, who meet specific income thresholds	Children in families with no recourse to public funds, who meet specific income thresholds	To be confirmed: Children in families with no recourse to public funds, who meet specific income thresholds?	To be confirmed: Children in families with no recourse to public funds, who meet specific income thresholds?
<i>Who is recorded as pupil premium?</i>					
Everyone registered for FSM at any point in the last 6 years	Everyone registered for FSM at any point in the last 6 years	Everyone registered for FSM at any point in the last 7 years	Everyone registered for FSM at any point in the last 8 years	Currently to be confirmed / under development within government	Currently to be confirmed / under development within government

Final recommendations and suggestions that have arisen throughout the research including our deliberative engagement across the project with others working in this area are:

For policymakers:

- A national system of centralised auto-enrolment for FSM should take place, in order to minimise the number of entitled children not accessing meals and associated provisions, and so that policy can be enacted as devised and reach those intended.
 - This will also make FSM registration a more clearly defined measure of disadvantage, capturing all entitled through UC receipt: at the moment, the FSM measure in the NPD captures registration rather than entitlement.
- The government should move towards greater coverage of FSM eligibility for pre-schoolers, removing restrictive conditions, and resourcing provision.
 - Making entitlement in the early years equivalent to the later school years would not only remove the policy contradiction where the youngest children (who are most likely to live in families in poverty and who are at a key developmental stage) are less well served by food policy in education, it will result in data that is consistent with the later years and therefore helpful for research and analysis.
- Relatedly, government should consider extending auto-enrolment by joining up information at the statutory stage of education with preceding information in the pre-school years.
 - As some children attend funded pre-school on the basis of low income eligibility, and some receive early years pupil premium and/or early years FSM, a coherent cross-phase system could better track and consistently identify low-income children in order to provide targeted support.
- The process for registering children from families with no recourse to public funds also needs to be made easier, tackling issues with the application system and requirements, lack of clarity in government guidance, and fears that receiving FSM may impact crucial aspects of life such as asylum applications.

- Free early years meals policy should be clarified, and providers resourced for all children who meet FSM eligibility criteria, regardless of the type of early years setting they attend. Additionally, the ‘before and after lunch’ criteria, which can complicate registration processes, should be removed.

For analysts and researchers:

- Care needs to be taken when making comparisons between FSM/PP pupils and their peers. Consideration should be given to factoring in additional measures to analysis and interpretations to account for changes in composition and varying patterns of school enrolment across groups. Our analyses suggest that for many purposes it would be useful to account, either statistically during analysis or in interpretation of findings, for:
 - Periods of non-registration from school. For many purposes, periods of non-enrolment should be treated as equivalent to being enrolled and FSM-registered. This is because non-enrolled children are likely to be in poverty (and also to be disadvantaged within the system in other ways). While this will result in some false positives, it mitigates against many children missing out.
 - Ethnic group and language background
 - Location
 - Measures of local deprivation
- Comparisons of schools and areas should be careful when relying solely on pupil premium as a measure of disadvantage.
 - This is because pupil premium eligibility only requires a child to be FSM-registered once. There is wide variation in the number of instances of registration for FSM among PP children and, to some extent, this reflects differences in persistence of poverty.⁷

⁷ For example, according to PP designation, a child who has been FSM-entitled and registered for all six years through primary years 1-6 is treated as equivalent to a child who is registered only once, for example in year 3, and whose family circumstances are relatively more affluent for the remainder of the time.

- Researchers should continue flexibly to test and trial different approaches to conceptualising and measuring disadvantage, taking account of and responding to the uncertainties and changes in terms of data availability in this fast-moving area.
 - A composite measure using individual-level FSM combined with area-level deprivation has many conceptual and practical advantages (see Section 7; though it is far from perfect), so should be prioritised for development.

Introduction

Introduction

This is the main public output from a Nuffield Foundation-funded project exploring the free school meals (FSM) measure in the National Pupil Database, and its suitability for use in research and policy. For years, FSM has been a core measure of child and family circumstances, used by analysts and academics, within government, by services and practitioners, and within schools. It has been utilised to identify children for targeting and intervention, to allocate funding and resources, and to evaluate policies and educational systems. Given the prevalence of its use for high-stakes purposes, it is important to understand FSM more deeply.

In this output, we firstly, in Sections 1-4, briefly recap findings produced during the course of this project. These come from four main publications, and three shorter articles. They are:

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/wp-content/uploads/2024/01/FSM-Report-Strand-1-FINAL-1.pdf>

Campbell with Cooper and Fowler (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 with Campbell (2025) *'How do free school meal registration practices differ across place and time? Research with local authorities and schools.'* https://epi.org.uk/wp-content/uploads/2025/06/Updated-FSM-registration-report_FINAL.pdf

Campbell with Cooper (2025) *'Characteristics, experiences and outcomes of children registered – and not registered, when entitled – for free school meals.'* <https://epi.org.uk/publications-and-research/registration-for-free-school-meals-final-report>

Campbell and Cooper (2024) *'Exploring the free school meals measure in the English National Pupil Database.'* <https://www.bera.ac.uk/blog/exploring-the-free-school-meals-measure-in-the-english-national-pupil-database>

Campbell, Cooper and Hodge (2024) *'Under-registration for free school meals in early primary school: How could this be tackled?'* <https://epi.org.uk/publications-and-research/under-registration-for-free-school-meals-in-early-primary-school-how-could-this-be-tackled/>

Campbell (2025) '*Free school meals: the case for auto-enrolment.*'

<https://www.tes.com/magazine/analysis/general/free-school-meals-and-the-case-for-auto-enrolment>

In this main public output we also include two sections detailing new work. One (Section 5) gives a brief sense of some of the approaches to identifying socio-economic disadvantage within education systems in different countries.

The other (Section 6) summarises ideas from our end-of-project deliberative event, held at the Nuffield Foundation in July 2025. We invited expert researchers, policymakers and practitioners to discuss the issues raised throughout our work, and in that of others also exploring the use of FSM and associated topics, and to imagine next steps. All presentation slides from the event can be found here:

<https://epi.org.uk/wp-content/uploads/2025/07/Nuffield-FSM-Event-Slides.pdf>

Lastly, in Section 7, we propose next steps and highlight outstanding policy recommendations.

Section 1: Previous evidence and discussion on the free school meals (FSM) measure in the National Pupil Database

Section 1: Previous evidence and discussion on the free school meals (FSM) measure in the National Pupil Database

The first main output from this project was a review of the evidence and discussion on the FSM measure, its uses, strengths, and limitations.⁸ In this report, we briefly recapped findings from a previous publication that planted seeds for the project.⁹ Then we reviewed, synthesised and discussed existing evidence on the evolution of the FSM measure over the past two decades, and on its uses, including in pupil premium (PP). We explored the strengths and weaknesses of FSM and PP as measures for identifying disadvantaged pupils in research and policymaking, and we laid out next steps for the continuing project.

The rest of this section summarises key content from this first report.

FSM: the past two decades

Firstly, we laid out the factors – at the high-level macro, down to the individual family and child-level – that have impacted which children are recorded as FSM and non-FSM in the NPD.

Families are entitled to apply for FSM for their child based on their receipt of certain welfare benefits, and low-income.¹⁰ However, as well as individual-level family income poverty, registration of children as FSM depends on numerous aspects of the context and time in which they live. They include:

- Global economic and societal conditions that impact families' work and income (such as the financial crisis in 2008, and the Covid pandemic 2020 onwards).
- Welfare benefits regimes and policies under successive governments (because receipt of benefits determines entitlement for FSM).
- Incentives to sign up for and be registered as FSM-eligible (such as additional national entitlements and local provisions, based on FSM status – including holiday clubs and food programmes, and grants for expenses like school uniform).
- Disincentives to sign up for FSM (at the social level – for example, stigma – and the practical level – for example, lessened reason when free school meals become universal).

⁸ <https://epi.org.uk/wp-content/uploads/2024/01/FSM-Report-Strand-1-FINAL-1.pdf>

⁹ https://sticerd.lse.ac.uk/case/_new/publications/abstract/?index=8641

¹⁰ <https://www.gov.uk/apply-free-school-meals>

- The methods through which schools, local authorities, and governments promote and enable families to register their children as FSM-eligible.

This means that the composition of the group denoted FSM in the NPD varies and depends, to some extent, on the time and place in which a child lives. Measurable and unmeasurable family-level characteristics may have become more or less prevalent within the FSM-recorded group over time. The extent and types of disadvantages experienced by children recorded as FSM-eligible have differed over the years, in line with the changing contextual conditions and requirements for entitlement.

The evidence that we reviewed also indicates that, over time, the procedures for identifying children as ‘free school meal-eligible’ have increasingly dissociated from practices and decisions in terms of providing actual free school meals. Furthermore, children registered for FSM receive very different support and interventions depending on the area in which they live.

Strengths, weaknesses, and possible uses of the FSM measure in representing disadvantage and prioritising pupils

Our evidence review suggested a number of strengths and weaknesses of FSM as a measure, and nuances in the ways that it can be used more or less robustly in research and policymaking. Key to note here is that the discussion on FSM’s adequacy for its various uses often relies on an implicit tolerance for error, which varies and is subjective.

Strengths

- The FSM measure is easily and consistently available within the NPD and requires no additional burden on schools for collection.
- The FSM measure requires no additional disclosure of personal information from families to schools.
- The FSM measure has been widely used and therefore has currency in conveying messages about how children who are more disadvantaged are faring under different educational and wider social policy regimes.
- There is a body of research into the FSM measure and ways in which it can be used, which can be utilised in understanding, interpreting, and improving research and policymaking involving FSM.

Weaknesses

- The binary FSM measure:
 - obscures substantial variation and heterogeneity within the groups denoted FSM and non-FSM;
 - and fails to convey the gradient of incremental (dis)advantage seen across many other measures of pupil/family background.
- Using the FSM measure to make predictions and set expectations for individual pupils results in inaccurate information for some, because it averages over large differences within the FSM-registered group (and within the non-FSM-registered group). This can result in misallocation, bias, and stereotyping.
- FSM is often assumed to be an individual-level measure, but, in fact, propensity to be registered as FSM-eligible depends to some extent on structural, compositional, and cultural factors at the group and local level – lending a lack of clarity to what FSM means and represents.
 - For example, registration for FSM among entitled families is higher in areas which are more deprived, and within some ethnic groups compared to others.
- Pupil premium funding based on recorded FSM eligibility has fallen over a period where child poverty has risen – so FSM-registration does not adequately reflect levels of need based on its current criteria for eligibility.
- Some teachers report that FSM does not identify the most disadvantaged pupils within their school, so it targets ineffectively, and misallocates support and funding.
- This is congruent with quantitative studies of survey data, which suggest an imperfect overlap of FSM with key predictors of educational success and advantage within life, including:
 - Mothers' education
 - Measures of socio-economic status/'working class'
 - Family income-level, particularly gradients and the distribution at the higher end
 - Welfare benefits receipt
 - Instability/mobility in housing and other family circumstances
 - Parental employment

Some extremely disadvantaged pupils are therefore excluded from prioritisation based on the FSM measure.

Possible uses

We considered the evidence and its implications in terms of use of the FSM measure in research and analysis. Known FSM eligibility is recorded termly in the NPD for children present in state-funded education. Combining data from multiple time points over pupils' trajectories can improve and add nuance to interpretations in work using the measure, particularly when different combinations are compared and/or used alongside one another. Combinations may include:

- Considering children ever recorded FSM over the course of their school career, either as a distinct group, or compared to those 'never FSM,' or to the average.
- Using a linear variable denoting 'number of terms/years FSM' rather than a binary variable and looking across the spectrum.
- Using FSM alongside other measures of family circumstances, and triangulating understandings and interpretations with other data, from surveys and administrative sources, to generate a picture of how less resourced and advantaged families and pupils are faring.
- Interpreting the experiences of pupils denoted FSM through a wider lens, incorporating understandings of factors outside of education, such as poverty, in causing outcomes and experiences within education.

Section 2: New analyses of the National Pupil Database and Households Below Average Income data exploring who has been registered for free school meals and pupil premium

A solid teal horizontal bar with a diagonal cut on the right side, located at the bottom of the slide.

Section 2: New analyses of the National Pupil Database and Households Below Average Income data exploring who has been registered for free school meals and pupil premium

In the second main output¹¹ from this project we used records spanning all children in pre-school, primary, and secondary state education from 2003 to 2023, who are included in the National Pupil Database (NPD; where FSM-registration is recorded). We also made some comparisons to poverty estimates from the Households Below Average Income (HBAI) dataset, derived from the Department for Work and Pensions' Family Resources Survey.

We looked at levels of registration (and under-registration) for FSM over time and by age-group; at compositional changes to the groups of children flagged as FSM-eligible and pupil premium (PP)¹²; at patterns of registration for FSM throughout school careers; and at how FSM compares to area-based measures of income deprivation (IDACI). We also look at measures of low-income in the pre-school years.

Key messages and implications from this output

Several key messages emerged from the analyses in this second report. Firstly, **the proportion of children recorded as FSM-eligible in the NPD has risen since 2018, and the composition of the FSM group is now more diverse and uncertain**. Some children are in the group because of protections of legacy FSM-status under Universal Credit roll-out, while contemporary peers whose families have a similarly low income are not. Not knowing the basis on which children are included and flagged as FSM-eligible means the data on these pupils are less useful for research, and that policy is targeted less efficiently than is optimal.

Overall, across all years, **fewer children are registered for FSM than are estimated to be in poverty**. This is partly by design: because the family income threshold for registration is so low (£7,400 per annum). It is also because there is under-registration among eligible children. Additionally, FSM eligibility criteria do not account for factors such as housing costs and family size, which are heavily associated with poverty.

¹¹ <https://epi.org.uk/publications-and-research/who-has-been-registered-for-free-school-meals-and-pupil-premium-in-the-national-pupil-database/>

¹² Children are denoted pupil premium if they have ever been registered for FSM in the past six years

The under-registration of eligible pupils is not equally distributed across areas and pupil groups. The youngest primary children, in particular, are less likely to be registered, and this is problematic because investment in the earliest years lays important foundations. FSM registration confers funding through pupil premium as well as other substantial entitlements including to the Holiday Activities and Food Programme.

Very few nursery-aged children are registered for FSM, despite higher rates of poverty and food insecurity at this stage. Lack of registration for FSM amongst this age group is problematic, given the importance of early development and nutrition. In this second main report, we also discuss methodological implications of this lack of coverage for proxying poverty and low-income in research on the early years, and alternative measures.

Nationally, the non-FSM and non-pupil premium recorded groups have become more ethnically and linguistically diverse over the past decade, according to other data collected in the NPD. Change has been slower in the FSM/PP groups (though these groups were more diverse to begin with).

In terms of comparisons over time, this means that factors such as language background and ethnicity are useful to account for in research, as they will explain some of observed differences between groups. This is particularly important as **estimated poverty rates far exceed the percentage of children registered for FSM and PP within some ethnic groups** (but not others). Among children recorded as Pakistani, Bangladeshi or Indian ethnicities, estimated poverty rates are far higher than the percentage of children registered for FSM, and, to a lesser but still large extent, for PP.

In terms of geographies, there has been a slow shift over the past decade where children recorded as FSM are more likely to live in rural areas. Throughout the decade, there are very different relationships between the percentage of children estimated to be in poverty and the percentage registered for FSM, across different regions. This also differs within many regions over the years, and varies according to children's ages.

Turning to trajectories of FSM-registration over time, within cohorts, well over half of the PP children in both cohorts inspected at Year 11 (in 2023 and 2016) had been FSM-eligible and registered at points throughout their school career. They lived in very low-income families, and were eligible and registered, at times during both the primary and secondary school phases. In the 2023 cohort, White British children were much more likely than children of other ethnicities to

always be recorded as FSM-registered throughout their school careers. This was not the case for the 2016 cohort, when children recorded as Pakistani or Bangladeshi were more likely, emphasising the shifting nature of the FSM and PP registered groups. **Children in London were much less likely than most other regions to always be registered for FSM at every point during primary and/or secondary school, despite London's overall child poverty rates being high.**

Children who are **missing** from the data, and therefore not registered in state school in one term within an educational phase (primary or secondary), are particularly likely to have been registered for FSM at least at one other point. Alongside other research, this may suggest that children who experience time out of school are more likely, on average, to be economically or otherwise disadvantaged.

Aside from this, on average, **the more frequently a child is registered with a state school in the January spring census, the more likely they are ever to be registered for FSM.** This adds to evidence that children whose lives are more transient and who have less stability and continuity of contact with the education system are less likely to access the services and provisions to which they are entitled within it.

Variations across groups of children and individuals in number of times and timing of being recorded as FSM-eligible may reflect at least three things, at the family-level:

- timing and persistence of poverty experienced;
- differences in tendencies to claim, and underclaiming of FSM, among eligible children living in poverty; and
- transience and instability in school attendance – if children are missing from school, they will not be registered for FSM, regardless of family finances.

Children are registered for pupil premium if they have been registered for FSM at any point during the past six years. **There are vast differences between local authorities and schools in the number of times children who are registered for pupil premium have been registered for FSM.** In some schools, only one per cent of pupil premium children have been registered for FSM at every January spring census of the phase, in others, virtually all (99 per cent). In some local authorities, fewer than one per cent of Year 11 pupil premium children have always been registered for FSM, since reception; in others, 37 per cent. To the extent to which number of

registrations for FSM represents persistence of poverty, this presents problems for comparisons between schools and LAs that rely only on using PP to proxy disadvantage.

In some local authorities, rates of registration for FSM are much lower than would be expected given the average recorded deprivation level (IDACI) of children in the authority, and this has been more pronounced at some time points than others. Discrepancies between FSM and IDACI are lowest in the most recent years, and there is less variation by LA. To some extent this is probably because protections of legacy FSM status under Universal Credit roll-out have resulted in more children from income-deprived families being registered for FSM for longer. Discrepancies are lower in terms of PP registration. Nonetheless, some remain, meaning again **that some local areas are treated as serving a more advantaged population than they actually cover.**

Overall, **FSM/PP are a better proxy for poverty and educationally-relevant disadvantage in some areas than in others, and for children of some ethnicities and language backgrounds than others, and for children of some ages rather than others.** This has implications for research, policymaking, and the fairness and efficiency of resource distribution.

Recommendations

We ended this report with a number of recommendations, premised on the assumption that it is important for research and policymaking to use accurate data, and for resources to be targeted precisely and efficiently: in order to help build evidence, tackle inequalities, and compensate for disadvantages.

We argued that, to help achieve this, if recorded FSM eligibility is to continue to be utilised as a key measure, the government needs to better identify and quantify which children meet its criteria for FSM registration. Care also needs to be taken when making comparisons between FSM/PP pupils and their peers, with additional measures factored into analysis and interpretations to account for changes in composition and varying patterns of school enrolment across groups.

We posited that, if the government intends to continue using FSM for policy and resourcing purposes, it should analyse linked cross-government individual-level administrative data to explore and more exactly quantify the composition of the current FSM-denoted group, and how this has changed over time. The composition of the group, in terms of current as opposed to legacy FSM-eligibility, should be made explicit, so that a more nuanced understanding of the children now recorded as FSM (and not) can assist research, policymaking and resource

distribution. Since our report was published, at the time of writing this summary, the Department for Education has confirmed that such analysis has not yet taken place.¹³

We also recommended that the government should repeat previous exercises (last carried out in 2013) using linked cross-government data to accurately quantify under-claiming of FSM and under-registration for PP, including by individual LA.¹⁴ Again, this up-to-date information is necessary if FSM and PP are to continue to be used instrumentally in resourcing and policy.

We recommended that the government should move towards greater coverage of FSM eligibility for pre-schoolers, removing restrictive conditions, and resourcing provision.

Given known under-registration, we suggested moreover that the government should, as also recommended by the Education Select Committee and being tabled in a private members' bill, consider centralised auto-enrolment for FSM to render coverage more complete, particularly for the youngest children.¹⁵ This could be extended by joining up information at the statutory stage of education with preceding information in the pre-school years.

We suggested that, in analyses, depending on the exact research question, comparisons of the FSM/PP groups to the non-FSM/PP groups across time, age, or place would often benefit from accounting explicitly for composition according to ethnicity and language background (EAL). This is because these factors are not stable within the groups over time, age, and place, and may often explain apparent differences in outcomes according to FSM/PP status. Depending on the question and analyses, this may either be through factoring in the information on ethnicity and EAL statistically, or by using it in interpretation of patterns by FSM/non-FSM and PP/non-PP.

Depending on the exact research question, we also recommended that construction of measures using the FSM variable in historical NPD data would often benefit from incorporating both number of times registered for FSM, and time missing from education (when no FSM status is recorded). Not incorporating this information can result in underestimates of disadvantage for many children who miss some schooling.

¹³ <https://www.tes.com/magazine/news/general/dfe-does-not-know-how-many-pupils-will-lose-free-school-meals-fsm>

¹⁴ <https://assets.publishing.service.gov.uk/media/5a7b8bbaed915d414762113c/DFE-RR319.pdf>

¹⁵ <https://committees.parliament.uk/committee/203/education-committee/news/205506/schools-bill-should-autoenrol-children-for-free-school-meals-education-committee-report/>
<https://bills.parliament.uk/bills/3781>

We cautioned that comparisons of schools and areas should be careful when relying solely on PP as a measure of disadvantage. This is because there is wide variation in the number of instances of registration for FSM among PP children (and, to some extent, this reflects differences in persistence of poverty).

In the early years, in terms of measurement for research and picking up children known to be living in low-income families, we concluded that FSM by itself is inadequate for many purposes. Using different amalgamations of markers of low income, including early years FSM, early years PP, known pre-school funding on the basis of low income, and known FSM in early primary school, can result in indicators with no false positives: because all children who have been registered for these provisions have lived in low-income families at a proximal time. But a substantial proportion of false negatives (children in poverty who cannot be flagged in the data) remain in the groups not picked up by these measures during the early years.

Discussion points

Lastly, we noted in this report that Universal Credit protections mean that while the number of instances of being FSM-registered can be used (in combination with other factors, including missingness, as above) to better proxy disadvantage for earlier cohorts of children, this option is no longer viable for current cohorts. In future cohorts, we noted that even the measure of whether a child has ever been registered for FSM/PP will begin to change year by year, losing stability and precision across time.¹⁶ In fact, since the report was published, changes have been enacted, which will have further implications for measurement and research. From September 2026, all children will lose transitional protections to their FSM registration. At the same time, all those whose families receive Universal Credit will become entitled to register.¹⁷ The implications of this for the composition of the FSM-registered group and for its stability and variation over time are currently uncertain. We discuss this further in Section 7.

¹⁶ See here for further detail on the mechanisms behind this: <https://files.eric.ed.gov/fulltext/ED627800.pdf>

¹⁷ https://assets.publishing.service.gov.uk/media/68416b27578282a4b102c065/Free_school_meals_-_guidance_for_local_authorities_maintained_schools_academies_and_free_schools.pdf

Section 3: New analyses of the Millennium Cohort Study: Characteristics, experiences and outcomes of children registered – and not registered – for free school meals

Section 3: New analyses of the Millenium Cohort Study: Characteristics, experiences and outcomes of children registered – and not registered – for free school meals

In a detailed analytical paper,¹⁸ published alongside the current report, we investigate two main questions:

- What can we learn about the characteristics of children who are not registered for FSM when they meet eligibility criteria and are entitled to be registered?
- How does registration and identification as FSM-eligible relate to children's experiences within the school system?

We build on the previous literature and our work utilising the National Pupil Database (NPD) and Households Below Average Income dataset. We use linked data from the Millennium Cohort Study (MCS). The MCS has followed a large national sample of children from their birth around the turn of the century through their childhoods and teenage years, and into adulthood.

MCS data includes detailed information on welfare benefits receipt and indicators of family income, spanning the school years, at ages five, seven, 11, and 14. At each point we can construct indicators of whether a child looks as though they meet eligibility criteria and are entitled to and 'should be' registered for FSM.

The linked MCS data also includes yearly information directly from the NPD on FSM registration, so we can examine whether children who appear entitled and as though they 'should be FSM' are in fact registered – or not.

Key findings from this output

- At three out of the four time points (at ages five, seven and 14), the majority of MCS children living in poverty were not even entitled to be FSM-registered. This is because criteria are stringent and income thresholds for registration low.
- At all time points (at ages five, seven, 11 and 14), there is a group of children who meet criteria for registration but who are not registered.

¹⁸ <https://epi.org.uk/publications-and-research/registration-for-free-school-meals-final-report>

- The more times a child is not enrolled in a state school, the less frequently they are registered for FSM. But there is little relationship between number of enrolments and poverty. Children who miss more years are less likely to be registered for FSM – but they are similarly likely as those who are enrolled more often to be in long-term poverty.
- A fifth of MCS sample children in very disadvantaged families who meet criteria for FSM eligibility at both the primary and secondary stages are not consistently registered at both stages: suggesting substantial unmet need and a system not working as intended.

Factors predicting non-registration for FSM when entitled

Across the four study waves, at ages five, seven, 11 and 14, we look at a range of family and home characteristics, parent and financial factors, and school and local area factors that represent probable relative advantage / disadvantage.

For many of these factors, there is a gradient. Children registered for FSM seem to be the most disadvantaged, followed by those who are entitled but not registered, followed by those not in poverty.

Children registered for FSM when entitled are **less** likely than those not registered when entitled and **much less** likely than those not in poverty to:

- Have contact with their biological father
- Live in a home owned by their family (at older ages)
- Live in a home without damp
- Be read to every day
- Have a quiet area for homework
- Have their own computer
- Have no responsibilities for caring for others
- Have a parent with higher confidence in their own parenting
- Have a mother who works / has worked
- Have a mother with good health (at older ages)
- Have a mother with good mental health (at older ages)
- Have a mother who feels financially comfortable (at older ages)

- Have someone attend their parents' evening, or be involved with their school
- Have paid extra lessons

For other factors, the main pattern is of a **stark difference** between those families not in poverty and the rest: both children in poverty registered for FSM when entitled, and those in poverty but not registered when entitled.

Both children registered for FSM and those not registered when entitled but also in poverty are **much less** likely than those not in poverty to:

- Live in a home owned by their family (at younger ages)
- Have their own bedroom
- Go on paid day trips and outings
- Attend classes and clubs outside of school
- Own many books
- Have a mother with educational qualifications
- Have a mother in a managerial position
- Have a mother with good health (at younger ages)
- Have a mother with better mental health (at younger ages)
- Have a mother without perceived financial difficulty, or who is not behind with bills (at younger ages)
- Have not moved schools in recent years (at older ages)

A striking pattern at all four ages is an inverse relationship between registration for FSM and both the percentage of pupils within a child's school FSM-registered, and the income deprivation level of their immediate local area (according to the Indices of Multiple Deprivation). When family and home characteristics, parent and financial factors, and school and local area factors are controlled for, it is the percentage of pupils within a child's school who are registered for FSM that dominates. **The more peers registered within their school, the more likely an entitled child is to also be registered for their entitlement.**

Experiences and outcomes of children registered for FSM

Children in the MCS sample who are registered for FSM fare worst throughout their educational careers:

- In terms of their feelings about and reported experiences of school (e.g. their liking of school; feelings that their teacher is 'getting at them;' their unhappiness with and at school).
- In terms of their self-esteem, efficacy and expectations (though here there are also differences by gender) (e.g. feelings about their own capabilities and competence, plans for their future education).
- In terms of their teachers being more likely to judge them unfavourably, and to hold lower expectations for their progress – even when accounting for capabilities as proxied by cognitive test scores (e.g. teacher ratings of 'ability and attainment,' and of the child's likelihood of post-16 study and university attendance).
- By the time they take GCSEs, children registered for FSM are much less likely to pass key thresholds, both compared to those not in poverty and those in poverty but not registered for FSM when entitled (i.e. pupils who are similarly low-income and in receipt of the same qualifying welfare benefits).

Depression of trajectories and negative experiences within schooling seem particularly pronounced for the FSM-registered group including when they are compared to other children in poverty and those who meet registration criteria but are not signed up. This suggests a specific 'FSM penalty.'

Mechanisms through which this penalty may play out that are supported by this research and wider work within this area include:

- Poverty and related disadvantages being most profound among the FSM-registered group, which impacts multiple aspects of their families' resources and lives and consequentially educational attainment.
- Unnecessarily restrictive requirements and aspects of the school system (for example, costs for extras within the school day) acting to severely disadvantage and compound the disadvantage of those who are most deprived.

- Differentiating structures and practices within the education system acting to reproduce rather than mitigate social inequalities.

Recommendations and next steps

We consider our analyses of the MCS, those across our wider project, and our previous work, and conclude by making several recommendations in this particular report (on the characteristics and experiences of children registered and not registered for FSM in the MCS).

In analysis and for other purposes where a child being registered FSM-eligible is used as a key factor, periods of non-enrolment should be treated as equivalent to being enrolled and FSM-registered. This is because non-enrolled children are likely to be in poverty (and also to be disadvantaged within the system in other ways). While this will result in some false positives, it mitigates against many children missing out.

The clear gradient shown in this report particularly in attainment from those FSM-registered, to those entitled but not registered, to those otherwise in poverty, to those not in poverty, is a challenge once more to research that focuses solely on FSM-registered v non-FSM-registered when exploring the relationship between disadvantage and education (for example, in order to map progress in closing the attainment ‘gap’). Again, alongside findings in our previous reports for this project,¹⁹ this suggests a need to supplement FSM-based analysis with other measures.

As we recommended previously in the project, once again the evidence supports the suggestion that centralised national auto-enrolment for FSM should take place. Our findings in this report have shown that non-registered, entitled children are much more disadvantaged according to multiple dimensions than their peers not in poverty – and so it is important that they can access the meals and other provisions to which FSM-registration is a gateway.

Child poverty should be alleviated at source, so that its impacts are not felt throughout children’s lives. The most immediate and obvious first step to beginning to fulfil this is to revoke the ‘two child limit’ which mechanically places substantial numbers of children in poverty.

It is crucial to ensure the education system and schools work actively to counteract disadvantage in children’s home lives, rather than to compound it. Demands and requirements (for example, in

¹⁹ https://epi.org.uk/wp-content/uploads/2025/03/FSM-report-March-2025_PDF.pdf

terms of expensive branded uniforms and equipment and extra payments) should be legislated against. There is a move towards this in the current Children's Wellbeing and Schools Bill but it needs to go further.

It is important to think carefully about enactment and implementation of targeted policies; to be aware of and mitigate against unintended consequences of well-intentioned initiatives. This is so that they can be played out as fairly and effectively as possible and alleviate rather than reproduce disadvantage.

New data from studies of 2020s cohorts²⁰ will in time offer an opportunity to build on and update our analyses, and to see whether and the extent to which the patterns we have indicated here, where FSM-registered children fare worst throughout their educational careers, and children not in poverty fare best, continue in the more recent years and in upcoming policy and social environments.

²⁰ <https://fivetotwelve.org.uk/>
<https://cls.ucl.ac.uk/cls-studies/children-of-the-2020s-study/>
<https://www.annafreud.org/research/current-research-projects/growing-up-in-the-2020s-national-study/>

Section 4: How do free school meal registration practices differ across place and time? Research with local authorities and schools

A solid teal horizontal bar with a diagonal cut on the right side, located at the bottom of the slide.

Section 4: How do free school meals registration practices differ across place and time? Research with local authorities and schools

The third main report from our project²¹ explored 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.

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.²² 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 our third 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 updated²³ and a new child poverty strategy is due to be published.²⁴

The findings outlined below, summarising our third main report, 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 our 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.

²¹ https://epi.org.uk/wp-content/uploads/2025/06/Updated-FSM-registration-report_FINAL.pdf

²² <https://publications.parliament.uk/pa/cm5901/cmselect/cmeduc/732/report.html>

²³ <https://schoolsweek.co.uk/free-school-meals-check-system-redesign-to-boost-take-up/>

²⁴ <https://www.gov.uk/government/publications/tackling-child-poverty-developing-our-strategy/tackling-child-poverty-developing-our-strategy-html>

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 know that 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 entitled, 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 sufficient 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 sufficient funding to enable settings to provide the meals.

Section 5: What can
we learn from other
countries?

International
approaches to
identifying socio-
economic
disadvantage in
education systems

Section 5: What can we learn from other countries?

International approaches to identifying socio-economic disadvantage in education systems

Socio-economic disadvantage is widely recognised as a significant factor influencing pupils' educational outcomes.²⁵ In response, many countries have devoted considerable resource to supporting socio-economically disadvantaged pupils through targeted funding and interventions.²⁶ Understanding how education systems identify disadvantaged pupils is therefore of utmost importance, as these policy choices can shape who receives support, on what basis, and with what level of precision.

Given that the design of identification mechanisms has implications for equity, resource targeting, and the delivery of support in schools, this chapter briefly examines some of the international evidence to consider how socio-economic disadvantage is defined; what indicators and data sources are used; and what steps have been taken to improve the identification of need.

The section draws primarily on education systems that either use needs-based school funding formulas or allocate additional funding through targeted programmes for specific groups of pupils. It focuses on developments across a number of OECD countries, including both national and subnational systems, and concentrates on the primary and secondary phases of education (see **Annex B** for a summary of reviewed countries and data sources).²⁷ The focus throughout is on describing policies rather than evaluating their impact on pupil outcomes or recommending specific strategies; this, deliberately, is to support a clear comparison of identification mechanisms without conflating design features with questions of effectiveness.

There is wide variation in how socio-economic disadvantage is conceptualised

Some education systems focus narrowly on one dimension of socio-economic disadvantage.

Socio-economic disadvantage is often understood as the accumulation of barriers that limit access to economic, social, or cultural resources.²⁸ However, in several jurisdictions, a common

²⁵ <https://epi.org.uk/publications-and-research/annual-report-2024/>

²⁶ <https://www.nao.org.uk/reports/improving-educational-outcomes-for-disadvantaged-children/>

²⁷ The review reflects international examples for which policy documentation was available in English or could reasonably be translated

²⁸ <https://pubmed.ncbi.nlm.nih.gov/26301469/>

approach has been to capture dimensions related to economic disadvantage or income poverty. In practice, direct income data is seldom used. Instead, eligibility for welfare-linked entitlements, such as reduced or free school meals, is often used as an indirect measure of disadvantage. In Scotland, the Pupil Equity Funding allocation is based on the number of children eligible for free school meals; a similar approach is adopted in Northern Ireland's Common Funding Scheme.²⁹ In the United States, federal Title I allocations rely on census-derived estimates of the proportion of children living in poverty, with school lunch eligibility sometimes employed to refine estimates at the local level.³⁰

In contrast, other education systems have adopted a broader conception of disadvantage, incorporating educational and socio-cultural characteristics of the family. The Netherlands uses its '*onderwijsachterstandenindicator*' which combines data on the education level of both parents, whether the family is in contact with debt services, and additional indicators relating to migrant background.³¹ Similarly, Australia's Schooling Resource Standard calculates a 'socio-educational advantage' score derived from parental education (completed school education and highest level of post-school education) and occupation data.³²

Some education systems draw on indicators related to socio-economic disadvantage, including factors that reflect wider family circumstances. For example, New Zealand recently introduced an 'Equity Index' which draws on a suite of variables, including measures of parental socio-economic indicators (e.g. income, qualifications, benefit receipt, age at the pupils' birth, the number of older siblings and parental contact with the justice system); child socio-economic indicators (e.g. contact with youth justice, care and protection plans); transience (e.g. number of home changes); and national background (e.g. ethnicity, age at visa approval, migration status, proportion of lifetime spent overseas).³³ These models rest on the view that disadvantage emerges from the interplay of multiple risk factors.

²⁹ <https://www.gov.scot/policies/schools/pupil-attainment/>
<https://www.education-ni.gov.uk/articles/common-funding>
<https://www.education-ni.gov.uk/publications/free-school-meal-entitlement-fsme-indicator-socioeconomic-deprivation-northern-ireland-advantages-disadvantages-and-alternatives>

³⁰ <https://www.ed.gov/sites/ed/files/2022/02/Within-district-allocations-FINAL.pdf>

³¹ https://www.cbs.nl/-/media/_pdf/2019/45/de-nieuwe-onderwijsachterstandenindicator-primair-onderwijs.pdf

³² <https://www.education.gov.au/recurrent-funding-schools/schooling-resource-standard>.

³³ https://www.educationcounts.govt.nz/_data/assets/pdf_file/0003/243327/Equity-Index-variables-fact-sheet-Aug-2022.pdf

Yet it is worth noting that as the scope of indicators expands, so too does the potential for ‘conceptual slippage’; their inclusion can blur the distinction between socio-economic disadvantage and other forms of vulnerability. Where definitions are broad, it may be harder to ensure that support reaches pupils experiencing socio-economic hardship specifically (though the extent to which this is desirable is in itself to be debated). It may also become more difficult to assess whether funding is improving outcomes for the group being identified and prioritised, particularly if eligibility criteria capture a wider range of needs.

There is wide variation in how socio-economic disadvantage is measured

Another key distinction lies in whether disadvantage is identified at the level of the individual or inferred from broader area-level indicators. Many of the education systems listed above rely on individual-level indicators, derived from direct information about pupils or their families. Other education systems use area-level indicators, which infer disadvantage from the socio-economic characteristics of the neighbourhood in which pupils live or the schools they attend. These area-level indicators typically draw on administrative or census data, matched to either pupils’ home postcodes or the area in which the school is located. Ireland’s ‘Delivering Equality of Opportunity in Schools’ programme allocates funding using its ‘Pobal HP Deprivation Index’ based on home address, a composite index drawing on factors such as local rates of unemployment, low education, lone parenthood, and housing overcrowding.³⁴ Alberta, a province in Canada, adopts a similar but school-based approach; its ‘Socio-economic Status Grant’ is calculated using national census data aggregated at the school authority level with indicators including maternal education, lone parent households, home ownership, average income, and parental post-secondary education.³⁵ In sum, whilst such measures often capture socio-economic disadvantage, they do so through aggregating contextual data at a geographic level.

Area-level indicators are used in many systems, perhaps in part because they reduce reporting burdens; avoid the sensitivities of collecting and storing individual-level data; and draw on information that is often already available. Area-level indicators can potentially also capture

³⁴ <https://assets.gov.ie/static/documents/the-refined-deis-identification-model.pdf>

³⁵ <https://open.alberta.ca/dataset/8f3b4972-4c47-4009-a090-5b470e68d633/resource/c3303ed0-6b12-4774-b6c9-8a6b6115abbf/download/educ-funding-manual-2025-2026-school-year.pdf>

aspects of the broader environment including the peer groups and local contexts in which they are learning—factors which may independently influence a pupils’ outcomes in ways that individual-level data cannot fully capture. Yet these methods are not without limitation. There is a risk of ecological fallacy, in which assumptions about individuals are incorrectly inferred from data aggregated at the group level.³⁶ By treating neighbourhoods as if all families living there face the same challenges, they risk identifying some pupils as disadvantaged when they are not whilst missing others who are. Similarly, disadvantage may not affect all children in the same neighbourhood in the same way, nor does it have to shape their outcomes through the same mechanisms. Lastly, area-level indicators may be revised only occasionally and at inconsistent intervals, meaning they may become out of step with current socioeconomic conditions.³⁷

Education systems can also differ in the *number* of indicators they rely upon. Many of the reviewed systems drew on a wide set of variables, capturing multiple indicators into a composite profile. England’s National Funding Formula incorporates both eligibility for free school meals (a proxy for household income, though its limitations are well documented—see Campbell & Cooper, 2024) and the Income Deprivation Affecting Children Index (which reflects the proportion of children in low-income households within a given area).³⁸ Australia’s socio-educational disadvantage loading captures three measures whilst New Zealand draws on 37 measures.³⁹

The case for these multidimensional models is compelling; a more holistic definition may better capture the multiplicative and/or cumulative nature of disadvantage. Yet whilst such approaches may improve precision, they also introduce new challenges including decisions around variable weighting and the practical value of ‘more data’. Notably, the Netherlands previously included school area neighbourhood characteristics in its composite indicator but later removed them, having found that they contributed little explanatory value.⁴⁰

³⁶ https://shura.shu.ac.uk/7805/1/McCaig_-_an_ecological_fallacy_-_post_publication_version.pdf

³⁷ <https://epi.org.uk/publications-and-research/who-has-been-registered-for-free-school-meals-and-pupil-premium-in-the-national-pupil-database/>

³⁸ <https://www.gov.uk/government/publications/national-funding-formula-for-schools-and-high-needs-2025-to-2026>
<https://epi.org.uk/wp-content/uploads/2024/01/FSM-Report-Strand-1-FINAL-1.pdf>

³⁹ <https://www.education.gov.au/recurrent-funding-schools/schooling-resource-standard>
https://www.educationcounts.govt.nz/_data/assets/pdf_file/0003/243327/Equity-Index-variables-fact-sheet-Aug-2022.pdf

⁴⁰ https://www.cbs.nl/-/media/_pdf/2019/45/de-nieuwe-onderwijsachterstandenindicator-primair-onderwijs.pdf

Lastly, disadvantage has been recognised in binary terms in some education systems and in graded terms across others. Threshold-based models define eligibility through a single cut-off, providing support only to those who meet specified criteria. These models may be simpler to administer and can enable focused targeting of resources, but they risk excluding pupils whose circumstances closely resemble those just below the line. It also cannot distinguish between gradients of disadvantage. Conversely, continuous approaches aim to capture variation in the extent of need, potentially offering greater fairness and precision. However, when resources are limited, distributing support more widely may reduce the intensity of provision for those facing the most severe disadvantage. Countries have taken different positions on this trade-off; this juxtaposition can be illustrated by England's pupil premium and New Zealand's Equity Index, which adopt binary and graded approaches respectively. England's pupil premium reflects a threshold-based model, with funding allocated only for pupils who meet defined criteria—predominantly having been eligible for free school meals. This stands in contrast to New Zealand's Equity Index, which assigns each school a score based on a weighted combination of socio-economic indicators, with funding (generally) increasing in proportion to that score.⁴¹

The quality and completeness of data affect how disadvantage is captured

Self-reported and administrative data all play a role in identifying disadvantage, but each comes with specific trade-offs. Self-reported information collected at school enrolment can provide direct insight into family background, including parental education, occupation, or home language. Its quality, however, hinges on families' willingness and ability of families to provide accurate information. Non-response, partial completion, and variation in interpretation may lead to gaps or inconsistencies, especially where questions concern sensitive topics (e.g. income) or where cultural or language barriers are present (these may hinder families in equating overseas qualifications, for example). Meanwhile, administrative data can be drawn from existing government records (e.g. welfare or tax records). This has the potential to be more consistently recorded, up-to-date, and less burdensome for schools to collect. In New Zealand, the Equity

⁴¹ Education Counts, 'School Equity Index Bands and Groups'; <https://www.rnz.co.nz/news/national/509827/education-ministry-s-new-method-for-grouping-schools> https://web-assets.education.govt.nz/s3fs-public/2024-03/21.-1286888-SIGNED-ER-Finalising-the-Equity-Index-funding-approach-JN-JT-redactions-updated_Redacted.pdf?VersionId=NjJiBdhNR6SNJDjAlyM5FBtZ8Dwi3PQI

Note that in New Zealand, for statistical and analytical purposes, schools are grouped into seven bands and subsequently into three broader categories based on their Equity Index scores.

Index is calculated using linked anonymised data from its ‘Integrated Data Infrastructure’ service, removing the need for schools to collect or families to provide sensitive personal information directly.⁴² Still, it is important to note that administrative data are not without gaps. Where families have little contact with public services, or fall just outside eligibility thresholds for government programmes, disadvantage may go unrecorded.

Finally, education systems vary in the extent to which they make explicit provision for pupils whose socioeconomic background data may be incomplete or unavailable. In the Netherlands, policymakers use multiple imputation (a technique which estimates missing data based on patterns in the available information) to fill gaps in pupil records.⁴³ Meanwhile, in Ireland, a small number of pupils resident in Northern Ireland attend schools in the Republic but cannot be linked to national deprivation indices. To address this, a blended measure is used to combine and equivalise data from both jurisdictions.⁴⁴ Australia has also developed procedures to reduce exclusions in cases where data are incomplete. In fact, schools are encouraged to contact families to obtain missing information or follow up on unreturned forms and there is even specific guidance allowing for the use of data from custodial guardians if information on biological parents is unknown or incomplete.⁴⁵ Whilst their methods differ, these examples reflect a shared acknowledgement that gaps in data exist as well as a willingness to address them directly in policy design.

In summary, this brief review has highlighted wide variation in ways that countries identify socioeconomic disadvantage and prioritise pupils and schools within their education systems. Some countries continue to frame disadvantage primarily in economic terms, whilst others have begun to account for broader social and cultural factors. Yet even among more complex models, underlying assumptions vary considerably, and the line between disadvantage and other forms of vulnerability is not always clearly drawn. It is also clear that some systems rely on binary thresholds whilst others adopt graded models, and how approaches differ in their handling of

⁴² <https://www.govt.nz/browse/education/school-and-college/school-zones-reviews-and-equity-funding>

⁴³ https://www.cbs.nl/-/media/_pdf/2019/45/de-nieuwe-onderwijsachterstandenindicator-primair-onderwijs.pdf

⁴⁴ <https://assets.gov.ie/static/documents/the-refined-deis-identification-model.pdf>

⁴⁵ <https://www.acara.edu.au/reporting/student-background-data-collection-for-independent-schools#Section8>

<https://dataandreporting.blob.core.windows.net/anrdataportal/SBD-Images/data-standards-manual---student-background-characteristics---2022-edition.pdf>

incomplete or missing data. Across all of these approaches, there is a set of trade-offs that must be navigated: precision; administrative burdens on institutions and individuals; and underlying judgements, often implicit, about which pupils should be prioritised and why.

Section 6: Views from experts: messages and ideas from a deliberative event on uses of FSM and possibilities for the future

Section 6: Views from experts: messages and ideas from a deliberative event on uses of FSM and possibilities for the future

In July 2025, we held an in-person deliberative event at the Nuffield Foundation's offices in London. We shared selected findings and initial recommendations from this project, alongside presentations from other researchers (Dave Thomson of FFT Education Datalab⁴⁶ and Timo Hannay of SchoolDash⁴⁷) working in the area. All slides from the event can be accessed here:

<https://epi.org.uk/wp-content/uploads/2025/07/Nuffield-FSM-Event-Slides.pdf>

Around 50 attendees from varied backgrounds participated: including central and local government; governmental agencies; universities; research and policy organisations; charities and lobby groups; and education unions. The event took place under the Chatham House Rule.⁴⁸

Attendees were invited to discuss prompt questions focussed on a) issues with and best practice in using measures of FSM in historical administrative and linked cohort data, for research and policy evaluation; b) what we know, and what we should do, about current issues around registration for FSM; and c) how we can and should measure disadvantage for research and policymaking going forward. The full list of prompt questions can be found in the slides linked above.

Notes were taken throughout the event by facilitators and participants were encouraged to record points they considered key on post-its, which accumulated on display throughout the event. Along with facilitators' records, they are used in the summary below. Discussions overlapped between breakout sessions and topics, so this summary synthesises themes and ideas emerging throughout the event. There was not consensus on all points; the write-up below attempts to give a sense of the range of discussion, and some ideas are therefore in potential contention with one another.

⁴⁶ <https://ffteducationdatalab.org.uk/author/davethomson/>

⁴⁷ <https://www.schooldash.com/about.html>

⁴⁸ <https://www.chathamhouse.org/about-us/chatham-house-rule>



Issues with FSM as a measure

Participants discussed FSM's limitations in not taking account factors known to be important to life chances and educational progression, including location (rurality; coastal areas), local economies (including seasonal working), opportunities, contextual area disadvantages, intergenerational deprivation, and ethnicity and language background: one requested, 'please do not define disadvantage based on a single indicator.'

Participants expressed concerns that the longstanding focus on FSM as the key measure of disadvantage has hidden or minimised other factors crucial to educational attainment and wellbeing; that it 'drives policy.' This includes family and childhood factors such as parental mental health, access to wider support services, and adverse childhood experiences. Participants suggested that 'not measuring what we think we are is bad for policymaking' and that being recorded as FSM-eligible 'doesn't match with reality and the families who are struggling most.'

Participants highlighted the fact that children's eligibility for FSM depends on macro-economic conditions which in part determine their family's situation. Participants raised issues around biases and inequalities in FSM-applications, including those related to digital literacy and access to technology for online applications. They also stressed problems with lack of information conveyed through the measure about home educated children, and those not in education. Some also highlighted that FSM is not meaningfully available as a measure at the pre-school or post-16

stages, and discussed implications of this both in terms of prioritisation of children at these stages, and of the stages themselves compared to primary and secondary education.

Use of FSM in research

Participants expressed doubt about the veracity of research using FSM in time series and longitudinal comparisons, particularly when examining marginal differences, which may be particularly sensitive to the composition of the groups recorded as FSM and non-FSM: 'it is too unstable a measure to be used in isolation.'

On the other hand, participants emphasised that FSM does have predictive value, and that its use can be somewhat improved by using cumulative and pattern constructions from multiple points of registration, incorporating information of missing/unknown years (though transitional protections render this less helpful in recent times).

Participants emphasised the importance of considering other factors, especially ethnicity, alongside FSM, given, for example, that the patterns of attainment associated with FSM registration vary very much by ethnicity. They questioned what exactly FSM is measuring, given these interactions, and suggested that, 'at the individual level, interaction with other variables is more useful (IMD, ethnicity, EAL, etc).'

Participants suggested that further work will help understand which groups of entitled children are less likely to be registered for FSM, and that this understanding can be used to improve research utilising the measure. Some also suggested that a 'good practice guide' to or checklist for using FSM in analysis – highlighting its limitations and caveats and shifts that apply to certain time periods or groups, for example, would be helpful – to researchers and to policymakers and delivery staff using the measure.

Use of FSM in accountability and schools

Participants suggested that it is highly problematic to compare schools based on the number of pupils registered for FSM. Reasons for this included the fact that many contextual factors influencing families and schools are not picked up by FSM registration, and that 'schools are held accountable for things that are beyond their control.' Some participants suggested that other measures of vulnerability are in fact more important and relevant in the schools context – including whether children have special educational needs and disabilities.

Participants discussed the complexities of positive vs perverse incentives within the funding and accountability system when it comes to registering children for FSM. This includes perverse incentives and barriers in terms of food provision itself: participants highlighted associated issues with funding and implementation of free breakfast clubs, which are far from being fully rolled out. Participants report that funding assigned to free meals is increasingly insufficient to cover the cost of the meals, so heightened numbers of FSM-registered pupils will place more pressure on schools. They also suggested that increased numbers of FSM-registered pupils may result in pupil premium money or money from elsewhere in schools' budgets being used to resource meal provision, particularly as there is a year's lag in provision of funding specifically for meals (based on recorded take-up).

Some participants stressed a need to 'trust schools to know their communities and who is disadvantaged there...FSM doesn't reflect on-the-ground realities.' They suggested that, 'The accountability attached to pupil premium pressures schools into taking a binary, deficit model in approaching disadvantage...[putting] the cart before horse in basing interventions on top-level FSM data.' Others suggested that pupil premium designation results in pupils being unhelpfully 'marked out,' or stigmatised, with a simplistic characterisation that 'stops us looking at problems in depth.'

Use of FSM in funding

Participants expressed concerns about continued use of FSM in decisions around targeting and distribution of funding, given inconsistencies and inequalities in registration. However, others suggested it can be 'useful for targeting at an aggregated level.'

They also raised the point that the extent to which linked pupil premium (PP) funding can be spent effectively depends on the proportion of children in a school who are eligible (there was some suggestion that for schools with under 20% PP children, there is no scope to invest in major meaningful initiatives). This interacts with concerns about under-registration in more affluent areas and schools.

Conflicting uses, tensions, and lack of clarity

Participants discussed the fact that use of FSM is now a 'historical holdover.' They suggested that the probity of using a need for food as a blunt proxy for disadvantage was always questionable, but at least more straightforward; now provision and take-up of meals is becoming ever more

disconnected from registration of children as FSM-eligible, the need for an alternative measure or measures of disadvantage is more urgent.

One participant suggested a need to ‘remove “free school meals” as the term.’ Another highlighted the multiple confusing terms currently and soon to be in use (‘Free school meals;’ ‘Universal Infant FSM;’ ‘Universal Primary FSM;’ ‘Universal Credit FSM...’). Others pointed out increasing numbers of FSM-registered children do not actually take up the meals for which they are registered, according to data from the Department for Education⁴⁹ - while, conversely, schools report providing food to children in need who are not registered for FSM.

Participants suggested that the single measure – FSM-registration – has been used for two completely different purposes, never completely in lockstep. They emphasised that discussion and debate over measurement of disadvantage for research, policy-making and funding should not get in the way of providing food to hungry children.

While some suggested the desirability of consistency of use and understanding ‘across research, practice, and policy,’ others proposed that though research and policymaking often require consistency and stability in the groups of children registered for FSM, food provision requires much more flexibility, and the ability to respond to sudden changes of children’s behaviour, circumstances, and deeper developing knowledge about families.

Facilitators observed that the frustrations of the frontline sometimes appeared to conflict with the frustrations of researchers at the deliberative event, and questioned whether an inherent conflict has been brewed and whether solutions can be devised that are useful for both groups. Some participants suggested that decisions, funding and strategy around food provision should entirely be decoupled from measurement of disadvantage for other aspects of policymaking.

Alternative ways to measure disadvantage

Participants highlighted an advantage of using (components of) the Indices of Multiple Deprivation (IMD) being that they already exist, and have been developed with a large amount of analytical input. They questioned how much would be added by developing new measures rather than using existing metrics, and whether the resource produced would be disproportionate to the resources

⁴⁹ <https://explore-education-statistics.service.gov.uk/data-tables/permalink/cd2ca883-c815-4af1-268f-08ddc12495d2>

needed for production. Others, however, pointed out that the IMD have their own issues, including representing some local areas better than others.

Some participants suggested that a combined measure interacting whether a child has ever been registered for FSM with local deprivation measures (see Dave Thomson's example in slides linked above) has good predictive value and is an adequate way forward. Others suggested that area-level 'pen portraits' such as those produced by the ONS⁵⁰ or the characterisations presented in Timo Hannay's work (see slides linked above) would be useful.

Participants highlighted the strengths of instruments such as the Income Deprivation Affecting Children Index (IDACI), key being the fact that the IDACI is a relative measure. Families' positions compared to one another can be ascertained through the IDACI, allowing focus on (for example) the bottom quintile, as well as analysis throughout the whole distribution in the population, from bottom to top. One participant queried whether and when we are more concerned with identifying 'an absolute(ish) group,' vs 'a (relative) consistent slice of the population of a certain size.'

Participants discussed the Pupil-Parent Matched Data developed by the Department for Education.⁵¹ Some thought its quality was too low; others argued that for the groups potentially most of interest (those receiving tax credits or household benefits) it may be adequate.

Participants suggested that, in future, once each child has a consistent identifier across systems, such linked data will become more reliable – and possibilities for data linkages that will inform more nuanced proxies of disadvantages (including from the health system) may become possible.

Participants discussed other countries' approaches, including New Zealand's multi-dimensional framework (see Section 5 for more information). Some liked this approach ('we should be using multiple measures'), but others suggested that New Zealanders are not necessarily happy with the approach, and others that it would not work or be accepted by the public in England. Some participants wondered how much additional useful information is added though New Zealand's complex measure, and how this weighs up against the demands and resources of data collection and collation.

⁵⁰

<https://www.ons.gov.uk/methodology/geography/geographicalproducts/areaclassifications/2011areaclassifications/penportraitsandradialplots>

⁵¹ <https://durham-repository.worktribe.com/output/3959451/how-useful-is-household-income-as-a-factor-in-explaining-attainment-at-school-in-england-assessing-the-parent-pupil-matched-data-ppmd>

Some participants suggested that a more parsimonious approach focussing simply on prior attainment would be practical and adequate (given particularly that prior attainment is associated with many factors related to family and childhood disadvantage). Others still challenged this idea, or its use in isolation, because some groups of children (e.g. summer-borns, children speaking languages as well as English), tend to have steeper trajectories of attainment, and ‘catch up.’

2026 and beyond: time for a complete reset?

Participants discussed recent policy announcements that from September 2026, all transitional protections will end, while children in all families in receipt of Universal Credit will be eligible to register for FSM. They also discussed the continued lack of clarity regarding how pupil premium funding will be allocated.

They suggested that many different sub-groups combining FSM-eligibility with pupil premium (PP) eligibility may emerge. While some thought this may be analytically useful, because it will for example potentially allow identification of a ‘middling’ group who are FSM-registered but not PP, others thought it may end up being confusing and unclear.

Participants suggested that given these upcoming changes to eligibility criteria and the lack of certainty about group composition caused by Universal Credit FSM protections since 2018, now is the time for a complete reset of commonly agreed definitions of disadvantage within education research, policymaking, and funding. However, there was little consensus about immediately obvious ways in which this should be developed and what should be included, given the many factors known to be important to educational pathways and life chances.

To some extent there was a resignation among participants and for some a sense that the challenge of accurately and usefully conceiving and measuring disadvantage for educational policymaking was insurmountable. There was also some cynicism about the extent to which more accurate data would actually be utilised by government, given the ways that multiple agendas drive policymaking.

Some participants also pointed out that concerns about fair distribution of resources to schools only arise because so many other aspects of the education system result in an uneven distribution of pupils with different characteristics, and that tackling this of itself would result in a ‘more even playing field.’ Others suggested that concerns about distribution would be alleviated by introducing more universalism into the school day, including blanket provision of meals.

Some participants suggested that the reset could simply be to using Universal Credit receipt (and FSM-registration) as a measure of disadvantage from 2026. While this would again result in a binary measure with all the existing issues that FSM-registration has always had, it will at least reset the extremely (many feel too) low threshold for inclusion to a higher point, and it would be a low-resource solution. However, they also noted that any future changes in for example eligibility for Universal Credit would again undermine the consistency of this measure of disadvantage over time. Others suggested that pupil premium could continue to be distributed to all pupils registered for FSM, but at lower per pupil rates – resulting in no extra overall cost. This approach, some suggested, would, like use of FSM ‘be flawed,’ but still result in adequate weighting of funding, and ‘give insights into challenges within communities.’

Some participants opined that this could however be conceptually or politically problematic, given that some families much higher up the income distribution are in receipt of UC and may be ‘undeserving,’ suggesting ‘the entire UC cohort’ should not receive the same support as pupils previously registered for FSM. Others speculated that there may be a lag in registration in September 2026, and that there may be some ‘transition mess.’

Auto-enrolment for FSM

Several participants describe centralised auto-enrolment for FSM as a ‘no-brainer,’ ‘more socially just than what we have now,’ and the most efficient option, tackling ‘persistent under-registration rates that the DfE have known about for over a decade.’

Participants discussed issues with current efforts to implement local auto-enrolment exercises, including that in some areas, the infrastructure does not exist, and that the exercise can be costly, burdensome, and unaffordable to some already-stretched LAs and schools. It can also be perceived as legally risky for LAs and schools, for example, with doubts over whether it is acceptable to hold and process parents’/carers’ national insurance number.

On the other hand participants knew of successful local efforts which were perceived as enabling better delivery of food and other support to children, and better, more reliable and useful data on whether children are eligible or not. One LA described a ‘moral imperative’ to enable access for children.

Several barriers to centralised auto-enrolment were suggested. They included: privacy and legal concerns and ethical issues around data sovereignty, and the extent to which there is political will to contend with these concerns; and the desirability and practicalities of implementing an opt-out

system. Short-termism within the political cycle was also flagged as a barrier to set-up of new systems, alongside the need for solid, intentional long-term strategies.

Participants detailed how auto-enrolment would require input from three government departments, while (in the short term and in terms of a simplistic and arguable conception of ‘impact’), it would only be the Department for Education who would ‘benefit.’ However other participants suggested that the Department for Health might become involved or even take responsibility, as another potential ‘beneficiary.’ Issues were also perceived over data ownership and data controllership. The need for a complex cross government Memorandum of Understanding to be developed was suggested.

However, other participants opined that a new bill enabling set-up of auto-enrolment is entirely feasible, and suggested that a simple tick box on Universal Credit applications could be implemented. Participants suggested that looking at other jurisdictions, including Scotland and Scandinavia, may offer frameworks and solutions, and stated that, ‘existing systems can change with public and political will.’ Participants posited that current work on the Child Poverty Strategy is intended to be cross-governmental and long term and should provide a platform and opportunity to implement initiatives including auto-enrolment.

Participants suggested that were national FSM auto-enrolment enacted, this would set a precedent for other services and entitlements. This was seen variously as a positive thing (a move towards meeting need and removing barriers to access) but also potentially problematic politically, because it will demand more funding and resources. However, some participants suggested that many current FSM eligibility checking systems are supplied by several third parties, and that rationalising and centralising could be financially efficient.

Participants also highlighted that some families would not be covered by auto-enrolment, so the need for other ways to apply would remain. Additionally, not all families entitled to UC claim it, and there are data errors and complexities within the UC system itself. Some of the most vulnerable children are not entitled to UC, including those with no recourse to public funds in asylum seeking families.

Participants also questioned whether in practice auto-enrolment would result in funding ‘trade-offs,’ with money being taken from elsewhere to meet either increased number of FSM-registered children or resourcing at the central government level. This led back to discussions about the extent to which FSM is the best focal measure of disadvantage, and about which other vulnerable

children might lose out were FSM to be heavily concentrated on through auto-enrolment. Participants correspondingly questioned whether, as auto-enrolment will cost the government money, it is the most effective use of this money, in terms of impact on outcomes – or whether it would be ‘money better spent elsewhere.’ They stressed the need to be clear in intended goals of FSM policy: is it to tackle poverty or to improve attainment? – and is it the most effective and efficient way to do either, or both?

Section 7: Next steps and recommendations

Section 7: Next steps and recommendations

Throughout this project, we have explored the extent to which the free school meals (FSM) measure in the National Pupil Database can be a useful measure of pupil disadvantage, for research and policymaking. We have also explored biases, patterns and discrepancies in terms of the data on which pupils are registered for FSM. And we have conducted an in-depth dive into practices in registering pupils, and, relatedly, practices in provision of food and other support for children.

Our project has had an iterative and dynamic interaction within a fast-moving policy environment and with practice in this area. The research has been used in policy debate and development in the House of Lords and the House of Commons – including in support of proposed amendments to the Children’s Wellbeing and Schools Bill currently in progress,⁵² and in discussions on provision of meals.⁵³ Our report of March 2025 was referenced by the Department for Education to provide context for their expansion from 2026 of FSM-eligibility to all families in receipt of Universal Credit. During our qualitative surveys and interviews, several participants stated that taking part in the research had led them to question and review policies and processes in their local area or multi-academy trust.

What might replace FSM as a measure?

For better or worse, for decades, FSM has been a cornerstone measure within education research, policymaking, accountability structures and resource distribution. Notwithstanding its limitations as documented throughout this project, it has provided a commonly understood and consistently utilised metric. But recent developments have led to the biggest challenges yet to its validity and reliability.

⁵² <https://www.theyworkforyou.com/lords/?id=2025-06-23b.99.0&s=%22FSM%22+or+%22Free+School+Meals%22#g99.2>

⁵³ <https://hansard.parliament.uk/Commons/2025-03-18/debates/49B24D76-143E-475C-B44B-D9ED0727BE03/FreeSchoolMeals?highlight=free%20school%20meals%20not%20registered#contribution-A426A396-D1BE-4405-9DF3-81CAEF650523>

Table 1: Changes to FSM and pupil premium entitlement criteria over the transition period to 2026 and beyond

Jan 2023	Jan 2024	Jan 2025	Jan 2026	Jan 2027	Jan 2028
<i>Who can be registered as eligible for / is entitled to means-tested FSM (and therefore can appear as FSM-registered in the National Pupil Database)</i>					
Those receiving a qualifying legacy benefit (income support etc)	Those receiving a qualifying legacy benefit (income support etc)	Those receiving a qualifying legacy benefit (income support etc)	Those receiving a qualifying legacy benefit (income support etc)	Everyone currently on UC	Everyone currently on UC
Those on UC with income less than £7,400	Those on UC with income less than £7,400	Those on UC with income less than £7,400	Those on UC with income less than £7,400		
Those who have met the above criteria at any point since April 2018 (5 year period)	Those who have met the above criteria at any point since April 2018 (6 year period)	Those who have met the above criteria at any point since April 2018 (7 year period)	Those who have met the above criteria at any point since April 2018 (8 year period)		
Children in families with no recourse to public funds, who meet specific income thresholds	Children in families with no recourse to public funds, who meet specific income thresholds	Children in families with no recourse to public funds, who meet specific income thresholds	Children in families with no recourse to public funds, who meet specific income thresholds	To be confirmed: Children in families with no recourse to public funds, who meet specific income thresholds?	To be confirmed: Children in families with no recourse to public funds, who meet specific income thresholds?
<i>Who is recorded as pupil premium?</i>					
Everyone registered for FSM at any point in the last 6 years	Everyone registered for FSM at any point in the last 6 years	Everyone registered for FSM at any point in the last 7 years	Everyone registered for FSM at any point in the last 8 years	Currently to be confirmed / under development within government	Currently to be confirmed / under development within government

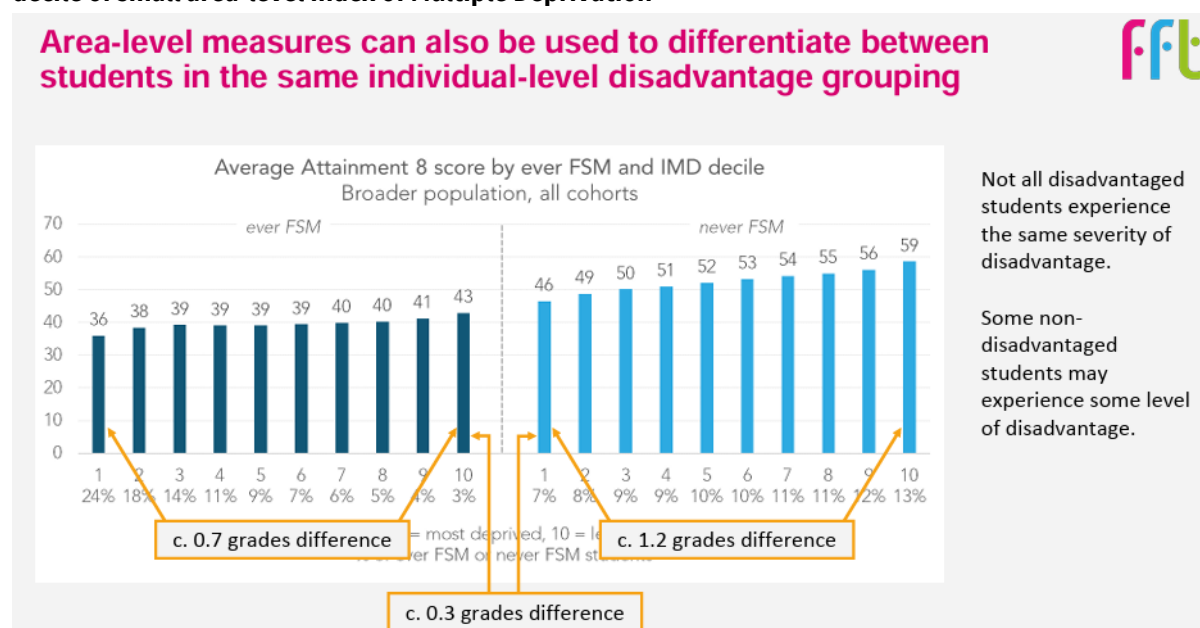
As Table 1 shows, transitional protections in place since 2018 mean that from 2025, all children who have met eligibility criteria at any point since 2018 are entitled to be registered for FSM – a seven year period. In 2026, this becomes an eight year period. Then in September 2026, legacy eligibility will cease – replaced by an entitlement among all children in families claiming Universal Credit. The extent to which the same children will fall into the legacy and the newly entitled groups is not yet fully quantified. Additionally, participants at our deliberative event suggested that the transition may not be smooth, with pupils entitled under the new criteria not necessarily

immediately signed up. The Department for Education is currently working on determining how pupil premium will be allocated in the long term.⁵⁴

As emphasised during our deliberative event⁵⁵ and in Section five of the current report, all potential replacements for FSM as a measure involve pros and cons, trade-offs and judgment calls. No option will be fully inclusive and precision must be balanced against practicality, burden, and privacy.

Given these uncertainties and instabilities, one thing that can consistently be known is whether a child has ever been registered for FSM in the NPD. At our deliberative event, Dave Thomson of FFT Education Datalab presented a provocation in terms of one potential new core measure of disadvantage that could arguably be used over time, age and place (Figure 1).

Figure 1: Average Attainment 8 score by whether a pupil has ever been recorded FSM eligible and decile of small area-level Index of Multiple Deprivation



Author: Dave Thomson, FFT Education Datalab (<https://ffteducationdatalab.org.uk/>)

He showed a clear, linear relationship to attainment when small, area-level local deprivation scores are combined with whether a child has ever been registered for FSM. Given the growing

⁵⁴ <https://www.theyworkforyou.com/lords/?id=2025-06-23b.99.0&s=%22FSM%22+or+%22Free+School+Meals%22#g99.2>

⁵⁵ <https://epi.org.uk/wp-content/uploads/2025/07/Nuffield-FSM-Event-Slides.pdf>

limitations of FSM itself as a consistent measure, this approach has several advantages, though there are also other alternatives still to be considered.

The approach combining ever FSM with area-based deprivation measures in some ways chimes with our research throughout this project, which has shown that FSM itself is not an entirely individual-level measure. Whether a child is registered depends on local factors, including FSM-registration rates within their own school. We have also shown patterns in under-registration and a worse relationship between being recorded as FSM-eligible and poverty for some groups, and pupils in some areas and of some ages, rather than others. To some extent, the proposed combination of measures of local deprivation with whether a child has ever been registered for FSM will smooth and compensate for these omissions and biases.

Conceptually, children's life chances and experiences within and outside of education are impacted by multiple circles of influence: not only by their immediate family circumstance. Recognising this by combining a measure (ever FSM) situated to some extent at the family level with a measure situated at the local area level takes a meaningful step towards recognising and accounting for this. A combined measure such as this, as demonstrated in Figure 1, also allows for more nuance and a recognition of the gradient ever present across multiple factors that impact children's trajectories. This addresses longstanding objections to FSM's blunt, binary nature, and its limitations and ability to obscure and mislead by constructing one group as starkly distinct from the rest.

Another advantage of this combined approach is that, like stand-alone FSM before it, it requires no new data collection, so is practically able to be implemented, and creates no extra burden. It is not perfect, however, for several reasons. Firstly, there will still be some – an arguably reasonably small, though this is to be analysed as data become available – inconsistency over time in terms of the children recorded ever FSM. Secondly, IMD measures and sub-measures in themselves are imperfect. Currently they have not been updated since 2019, and they become increasingly less accurate as time goes by since their benchmarking.

Some children will still be 'missed' or less accurately classified under a combined measure such as this: those whose families are not claiming the UC benefits to which they are entitled, and therefore cannot be FSM registered; those not entitled to UC (including asylum seekers in families with NRPF).

Perhaps particularly problematically, given our findings throughout this project and in the wider literature that children are less likely to be registered for their FSM entitlements in more affluent local areas and schools, there will be less accurate classification of those in low-income families in these more affluent areas who do not register for the FSM to which they are entitled (and who are therefore categorised as ‘never FSM’ and in an affluent IMD decile).

There is also more work to be done in determining whether the overall IMD index is the best measure of local area deprivation for these purposes, or whether a sub-index (for example, the Income Deprivation Affecting Children Index) would be more relevant. At our deliberative event, Timo Hannay of SchoolDash showed how average scores for different domains of the IMD can vary significantly for schools with the same pupil premium level.⁵⁶ An interactive tool for exploring these variations is available here: <https://www.schooldash.com/blog-2410.html#20241024> (see Figure 15). His work has also shown how population density is highly important in forming the environment within which children grow, and its relationship to their opportunities and outcomes.⁵⁷

Conceptually, this work and further analyses of the National Pupil Database combined with area-level indicators and other indicators shown throughout this project to intersect with economic disadvantage (e.g. ethnicity, EAL, periods missing from education) can help inform development of a core disadvantage measure for use within education.

The aspects of the local area that are most important to capture, alongside other variables, and the extent to which combined measures correspond to key factors influencing children’s lives (for example, mother’s education; housing situation) will be explored in work within the Education Policy Institute to investigate these and other alternatives. It is possible that once more is known and can be analysed as data from the transition period become available that new ideas will emerge and alternative measures will be developed.

Outstanding policy issues

Policy is moving quickly in this area, but at the time of writing, several recommendations from our project remain outstanding. Firstly, we recommended (alongside many others including the Education Select Committee) that centralised auto-enrolment for FSM should take place, in order

⁵⁶ <https://www.schooldash.com/blog-2410.html#20241024> – see Figure 15

⁵⁷ <https://schoolsweek.co.uk/measuring-school-disadvantage-a-better-way/>

to minimise the number of entitled children not accessing meals and associated provisions, and so that policy can be enacted as devised and reach those intended.

While participants in our deliberative event raised several issues and nuances around centralised auto-enrolment, there was also wide support for this and we continue to recommend that it should take place. In practice Local Authorities have begun to conduct their own exercises which, though more automatic from the family perspective, are not automatic in terms of the resources required from the LA, and which also displace legal issues to the LA. A process run within central government could be more efficient and a better use of public money, particularly once criteria for FSM-registration are simplified in 2026. This would also overcome practical challenges of implementing auto-enrolment at the local authority level – such as when children attend school in a different local authority to where they live.

We also recommended that the government should move towards greater coverage of FSM eligibility for pre-schoolers, removing restrictive conditions, and resourcing provision. Currently, only pre-schoolers attending a maintained setting before and after lunch are entitled to FSM, and our qualitative work found that requirements even for this were not clearly understood by some LAs and implementation of this policy is inconsistent. Making entitlement in the early years equivalent to the later school years would not only remove this policy contradiction where the youngest children (who are most likely to live in families in poverty and who are at a key developmental stage) are less well served by food policy in education, it will result in data that is consistent with the later years and therefore helpful for research and analysis.

References

References

- Alberta Education (2025) '*Funding Manual for School Authorities 2025-26 School Year.*'
<https://open.alberta.ca/dataset/8f3b4972-4c47-4009-a090-5b470e68d633/resource/c3303ed0-6b12-4774-b6c9-8a6b6115abbf/download/educ-funding-manual-2025-2026-school-year.pdf>
- Anna Freud (online) '*Growing Up in the 2020s - National Study.*'
<https://www.annafreud.org/research/current-research-projects/growing-up-in-the-2020s-national-study/>
- Australian Curriculum, Assessment and Reporting Authority (2022) '*Data Standards Manual: Student Background Characteristics.*'
<https://dataandreporting.blob.core.windows.net/anrdataportal/SBD-Images/data-standards-manual---student-background-characteristics---2022-edition.pdf>
- Australian Curriculum, Assessment and Reporting Authority (online, accessed 23 April 2025) '*Student Background Data Collection for Independent Schools.*'
<https://www.acara.edu.au/reporting/student-background-data-collection-for-independent-schools#Section8>
- 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/wp-content/uploads/2024/01/FSM-Report-Strand-1-FINAL-1.pdf>
- Campbell with Cooper and Fowler (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 with Campbell (2025) '*How do free school meal registration practices differ across place and time? Research with local authorities and schools.*' https://epi.org.uk/wp-content/uploads/2025/06/Updated-FSM-registration-report_FINAL.pdf
- Campbell with Cooper (2025) '*Characteristics, experiences and outcomes of children registered – and not registered, when entitled – for free school meals.*' <https://epi.org.uk/publications-and-research/registration-for-free-school-meals-final-report>

Campbell and Cooper (2024) '*Exploring the free school meals measure in the English National Pupil Database.*' <https://www.bera.ac.uk/blog/exploring-the-free-school-meals-measure-in-the-english-national-pupil-database>

Campbell, Cooper and Hodge (2024) '*Under-registration for free school meals in early primary school: How could this be tackled?*' <https://epi.org.uk/publications-and-research/under-registration-for-free-school-meals-in-early-primary-school-how-could-this-be-tackled/>

Campbell (2025) '*Free school meals: the case for auto-enrolment.*' <https://www.tes.com/magazine/analysis/general/free-school-meals-and-the-case-for-auto-enrolment>

Campbell and Obolenskya (2021) '*No such thing as a free lunch? Exploring the consistency, validity, and uses of the 'Free School Meals' (FSM) measure in the National Pupil Database.*' https://sticerd.lse.ac.uk/case/_new/publications/abstract/?index=8641

Centre for Longitudinal Studies (online) '*Children of the 2020s study.*' <https://cls.ucl.ac.uk/cls-studies/children-of-the-2020s-study/>

Chathamhouse.org (online). '*Chatham House Rule.*' <https://www.chathamhouse.org/about-us/chatham-house-rule>

Department for Education (2025) '*Free school meals Guidance for local authorities, maintained schools, academies and free schools.*' https://assets.publishing.service.gov.uk/media/68416b27578282a4b102c065/Free_school_meals_-_guidance_for_local_authorities_maintained_schools_academies_and_free_schools.pdf

Department for Education (2024) '*National Funding Formula for Schools and High Needs: 2025 to 2026*', 2024.' <https://www.gov.uk/government/publications/national-funding-formula-for-schools-and-high-needs-2025-to-2026>

Northern Ireland Department of Education (online) '*Common Funding*', 20 July 2015.' <https://www.education-ni.gov.uk/articles/common-funding>

Australian Department of Education (online) '*Schooling Resource Standard*,' 26 March 2025.' <https://www.education.gov.au/recurrent-funding-schools/schooling-resource-standard>

Irish Department of Education (online) '*The Refined DEIS Identification Mode*, March 2022.' <https://assets.gov.ie/static/documents/the-refined-deis-identification-model.pdf>

US Department of Education (online) '*Within-District Allocations Under Title I, Part A of the Elementary and Secondary Education Act, February 2022.*'

<https://www.ed.gov/sites/ed/files/2022/02/Within-district-allocations-FINAL.pdf>

Duncan, Greg, and Magnuson. 'Socioeconomic Status and Cognitive Functioning: Moving from Correlation to Causation'. *WIREs Cognitive Science* 3, no. 3 (2012): 377–86.

<https://doi.org/10.1002/wcs.1176>

Education Counts (online, accessed 23 April 2025) '*School Equity Index Bands and Groups; Ministry of Education.*' <https://www.educationcounts.govt.nz/data-services/guidelines/school-equity-index-bands-and-groups>

Education Policy Institute (2024) '*Annual Report 2024.*' <https://epi.org.uk/annual-report-2024/>.

explore-education-statistics.service.gov.uk (online) 'Pupil characteristics - number of pupils by fsm eligibility' from 'Schools, pupils and their characteristics' <https://explore-education-statistics.service.gov.uk/data-tables/permalink/cd2ca883-c815-4af1-268f-08ddc12495d2>

FFT Education Datalab (online) '*About Dave Thomson.*'

<https://ffteducationdatalab.org.uk/author/davethomson/>

Five to twelve (online) <https://fivetotwelve.org.uk/>

Gerritsen (2024) '*Education Ministry's New Method for Grouping Schools.*'

<https://www.rnz.co.nz/news/national/509827/education-ministry-s-new-method-for-grouping-schools>.

Gorard and Siddiqui (2025) '*How useful is household income as a factor in explaining attainment at school in England? Assessing the Parent Pupil Matched Data (PPMD).*' <https://durham-repository.worktribe.com/output/3959451/how-useful-is-household-income-as-a-factor-in-explaining-attainment-at-school-in-england-assessing-the-parent-pupil-matched-data-ppmd>

<https://durham-repository.worktribe.com/output/3959451/how-useful-is-household-income-as-a-factor-in-explaining-attainment-at-school-in-england-assessing-the-parent-pupil-matched-data-ppmd>

Gov.uk (online) '*Apply for free school meals.*' <https://www.gov.uk/apply-free-school-meals>

Gov.uk (2025) '*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>

Hansard.parliament.uk (2025) '*Free School Meals. Volume 764: debated on Tuesday 18 March 2025.*'

<https://hansard.parliament.uk/Commons/2025-03-18/debates/49B24D76-143E-475C-B44B->

[D9ED0727BE03/FreeSchoolMeals?highlight=free%20school%20meals%20not%20registered#contribution-A426A396-D1BE-4405-9DF3-81CAEF650523](https://www.gov.uk/government/publications/free-school-meals-not-registered-contribution-A426A396-D1BE-4405-9DF3-81CAEF650523)

Hodgeson (2025) *'DfE doesn't know how many pupils will lose FSM.'*

<https://www.tes.com/magazine/news/general/dfe-does-not-know-how-many-pupils-will-lose-free-school-meals-fsm>

Lord, Easby and Evans (2013) *'Pupils not claiming Free School Meals – 2013.'*

<https://www.gov.uk/government/publications/pupils-not-claiming-free-school-meals-2013>

McCaig and Harrison (2015). *'An Ecological Fallacy in Higher Education Policy: The Use, Overuse and Misuse of "Low Participation Neighbourhoods"'*. Journal of Further and Higher Education,

https://shura.shu.ac.uk/7805/1/McCaig_-_an_ecological_fallacy_-_post_publication_version.pdf

Ministry of Education (2022). *'Equity Index Variables.'*

https://www.educationcounts.govt.nz/_data/assets/pdf_file/0003/243327/Equity-Index-variables-fact-sheet-Aug-2022.pdf.

Ministry of Education (2022) *'Finalising the Equity Index Funding Approach.'* https://web-assets.education.govt.nz/s3fs-public/2024-03/21.-1286888-SIGNED-ER-Finalising-the-Equity-Index-funding-approach-JN-JT-redactions-updated_Redacted.pdf?VersionId=NjJiBdhNR6SNJDjAlyM5FBtZ8Dwi3PQI

National Audit Office (2024) *'Improving Educational Outcomes for Disadvantaged Children.'*

<https://www.nao.org.uk/reports/improving-educational-outcomes-for-disadvantaged-children/>

New Zealand Government (2023). *'School Zones, Reviews and Equity Funding'*.

<https://www.govt.nz/browse/education/school-and-college/school-zones-reviews-and-equity-funding/>.

Ons.gov.uk (online) *'Pen portraits and radial plots.'*

<https://www.ons.gov.uk/methodology/geography/geographicalproducts/areaclassifications/2011areaclassifications/penportraitsandradialplots>

Parliament.uk (2025) *'"Schools Bill" should auto-enrol children for free school meals – Education Committee report.'*

<https://committees.parliament.uk/committee/203/education-committee/news/205506/schools-bill-should-autoenrol-children-for-free-school-meals-education-committee-report/>

Parliament.uk (2025) 'Free School Meals (Automatic Registration of Eligible Children) Bill.'

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

Parliament.uk (2025) 'Scrutiny of the Children's Wellbeing and Schools Bill.'

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

Posthumus, Hanneke, Sander Scholtus, and Walhout (2019) 'De nieuwe

onderwijsachterstandenindicator primair onderwijs.' <https://www.cbs.nl/-/media/pdf/2019/45/de-nieuwe-onderwijsachterstandenindicator-primair-onderwijs.pdf>

Roy, Debbie, Ferry, Rawers, O'Connor-Bones, Shevlin, and McElroy (2024) 'Free School Meal

Entitlement (FSME) as an Indicator of Socioeconomic Deprivation in Northern Ireland: Advantages, Disadvantages and Alternatives.' <https://www.education-ni.gov.uk/publications/free-school-meal-entitlement-fsme-indicator-socioeconomic-deprivation-northern-ireland-advantages-disadvantages-and-alternatives>.

Sharp, Julius and Hillary (2023) 'Measuring pupil disadvantage: The case for change.'

<https://www.nfer.ac.uk/publications/measuring-pupil-disadvantage-the-case-for-change/>

Scottish Government (2025) 'Pupil Attainment: Closing the Gap.'

<https://www.gov.scot/policies/schools/pupil-attainment/>

Schooldash.com (online). 'About.' <https://www.schooldash.com/about.html>

Schooldash.com (2024) 'The many faces of disadvantage.' <https://www.schooldash.com/blog-2410.html#20241024>

Schoolsweek (2024) 'Measuring school disadvantage: a better way?'

<https://schoolsweek.co.uk/measuring-school-disadvantage-a-better-way/>

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/>

Theyworkforyou.com (2025) 'Amendment 189. Children's Wellbeing and Schools Bill - Committee (7th Day) – in the House of Lords at 8:45 pm on 23 June 2025.'

<https://www.theyworkforyou.com/lords/?id=2025-06-23b.99.0&s=%22FSM%22+or+%22Free+School+Meals%22#g99.2>

Annex A: Citations and acknowledgements for all data used throughout project

National Pupil Database

This publication includes summaries of analysis of the National Pupil Database (NPD):

<https://www.gov.uk/government/collections/national-pupil-database>

The Department for Education is responsible for the collation and management of the NPD and is the Data Controller of NPD data. Any inferences or conclusions derived from the NPD in this publication are the responsibility of the Education Policy Institute and not the Department for Education.

This work contains statistical data from ONS which is Crown Copyright. The use of the ONS statistical data in this work does not imply the endorsement of the ONS in relation to the interpretation or analysis of the statistical data. This work uses research datasets which may not exactly reproduce National Statistics aggregates. Analysis was carried out in the Secure Research Service, part of the Office for National Statistics.

Households Below Average Income

A report summarised here uses data from the Households Below Average Income dataset.

Citation: Department for Work and Pensions. (2023). Households Below Average Income, 1994/95-2021/22. 17th Edition. UK Data Service. SN: 5828, DOI: <http://doi.org/10.5255/UKDA-SN-5828-15>

Millennium Cohort Study and linked National Pupil Database

This report includes summaries of analyses using the Millennium Cohort Study and Linked Education Administrative Datasets:

University College London, UCL Institute of Education, Centre for Longitudinal Studies, Department for Education. (2024). Millennium Cohort Study: Linked Education Administrative Datasets (National Pupil Database), England: Secure Access. [data collection]. 3rd Edition. UK Data Service. SN: 8481, DOI: <http://doi.org/10.5255/UKDA-SN-8481-3>

University of London, Institute of Education, Centre for Longitudinal Studies. (2023). Millennium Cohort Study: Age 9 months, Sweep 1, 2001. [data collection]. 14th Edition. UK Data Service. SN: 4683, DOI: <http://doi.org/10.5255/UKDA-SN-4683-6>

University of London, Institute of Education, Centre for Longitudinal Studies. (2024). Millennium Cohort Study: Age 3, Sweep 2, 2004. [data collection]. 12th Edition. UK Data Service. SN: 5350, DOI: <http://doi.org/10.5255/UKDA-SN-5350-7>

University of London, Institute of Education, Centre for Longitudinal Studies. (2023). Millennium Cohort Study: Age 5, Sweep 3, 2006. [data collection]. 9th Edition. UK Data Service. SN: 5795, DOI: <http://doi.org/10.5255/UKDA-SN-5795-6>

University of London, Institute of Education, Centre for Longitudinal Studies. (2023). Millennium Cohort Study: Age 7, Sweep 4, 2008. [data collection]. 9th Edition. UK Data Service. SN: 6411, DOI: <http://doi.org/10.5255/UKDA-SN-6411-9>

University of London, Institute of Education, Centre for Longitudinal Studies. (2023). Millennium Cohort Study: Age 11, Sweep 5, 2012. [data collection]. 6th Edition. UK Data Service. SN: 7464, DOI: <http://doi.org/10.5255/UKDA-SN-7464-6>

University of London, Institute of Education, Centre for Longitudinal Studies. (2024). Millennium Cohort Study: Age 14, Sweep 6, 2015. [data collection]. 7th Edition. UK Data Service. SN: 8156, DOI: <http://doi.org/10.5255/UKDA-SN-8156-7>

We are grateful to The Centre for Longitudinal Studies, UCL Institute of Education, for the use of these data, to the UK Data Service for making them available, and to all participants in the MCS. All analyses, interpretations and errors are our own.

The use of these data does not imply the endorsement of the data owner or the UK Data Service at the UK Data Archive in relation to the interpretation or analysis of the data. This work uses research datasets which may not exactly reproduce National Statistics aggregates.

Annex B: Summary table of reviewed countries

Country	Socio-economic factors considered	Self-reported, census or administrative data
Australia	Parental education; parental occupation <i>Note implementation may vary by local area but guided by national rules.</i>	Self-reported
Canada	Varies by province (e.g. Alberta considers parental education, lone parent households, home ownership, average income etc)	Varies by province
Ireland	Composite index considers various factors (e.g. education levels, single parent rate, overcrowding, unemployment levels etc.)	Census data
Netherlands	Parental education; country of origin; length of stay of mother in Netherlands; average educational level of all mothers at the school; whether the parents are receiving support for debt repayments	Administrative data

New Zealand	Parental socio-economic indicators; child socio-economic indicators; national background; and transience	Administrative data
Switzerland	Varies by cantonal level (e.g. Zurich considers share of foreigners, share of children receiving social assistance and share of taxpayers with a low income)	Varies by cantons
UK: England	National Funding Formula's Deprivation factor: Free school meal eligibility and area-level deprivation (Income Deprivation Affecting Children Index) Pupil premium: Eligible for free school meals (either currently or have been recorded as eligible in the past 6 years); and children previously looked after by a local authority or other state care are also considered. <i>Note implementation may vary by local area but guided by national rules</i>	Administrative data

UK: Northern Ireland	The Common Funding Scheme's Targeting Social Need factor - Free school meal eligibility Extended schools programme – Schools are identified through the proportion of pupils eligible for free school meals or live in an area classified as disadvantaged (Northern Ireland Multiple Deprivation Measure; Neighbourhood Renewal Area)	Administrative data
UK: Scotland	Pupil Equity Funding – Free school meal eligibility Strategic Equity Funding – Children in Low Income Families data <i>Note implementation may vary by local area but guided by national rules</i>	Administrative data
UK: Wales	School funding can be based on two factors: Eligibility for free school meals; area-level deprivation (Welsh Index of Multiple Deprivation)	Administrative data

	School Essentials Grant – Eligibility for free school meals and children who are looked after Pupil Development Grant – Eligibility for free school meals and children who are looked after <i>Note implementation may vary by local area but guided by national rules</i>	
USA	Varies by state – Federal Title I funding based on local poverty statistics	Varies by state; Federal Title I funding based on census data