Auto-enrolment of free school meals - A 'No Brainer'?

Maria Bryant^{1,2}*, Rob Oxley², Myles Bremner³, Cressida Pidgeon³, Shona Goudie⁴, and Bob Doherty⁴

*Corresponding author: Maria Bryant, Hull York Medical School, University of York, York, YO10 5DD, maria.bryant@york.ac.uk



This is an Accepted Manuscript for Public Health Nutrition. This peer-reviewed article has been accepted for publication but not yet copyedited or typeset, and so may be subject to change during the production process. The article is considered published and may be cited using its DOI 10.1017/S1368980025000382

Public Health Nutrition is published by Cambridge University Press on behalf of The Nutrition Society. This is an Open Access article, distributed under the terms of the Creative Commons Attribution licence (http://creativecommons.org/licenses/by/4.0/), which permits unrestricted re-use, distribution and reproduction, provided the original article is properly cited.

¹Hull York Medical School, University of York, York, YO10 5DD

²Department of Health Sciences, University of York, YO105DD

³Bremner & Co, Kineton, CV35 0LS

⁴School for Business and Society, University of York, York, YO10 5DD

Commentary

It has been estimated that at least 250,000 children who are entitled to receive a free school meal (FSM) in England are not registered to do so^[1]. There are many complex reasons why this might be the case, but research indicates issues related to shame, perceived stigma, and substantial administrative burden with the FSM application process (influenced by language, literacy and access barriers)^[2,3]. To qualify for FSM in England, children must live in households where income is below £7,400 before tax and benefit support. Thus, children who do not receive their FSM entitlement are living in very high levels of deprivation and missing out on a daily hot meal at school. Importantly, FSM eligibility is also used as a marker of 'need' and is linked to 'Pupil Premium' funding provided to schools. For every FSM registered child in English primary schools, including special schools, the school receives £1,480 (€1,754, \$1,915) per year. For secondary schools, including special schools, this funding equates to £1,050 (€1,244, \$1,358) [4]. Our ongoing research exploring the benefits and challenges of auto-enrolment processes for FSM (whereby parents are not responsible for applying) is gaining pace. We feel compelled to report on what we are learning along the way; sharing the stories from local governments who are showing us why national autoenrolment is so critical.

We first learnt of local level approaches to introducing opt/out, auto-enrolment FSM registration processes from an English local government, 'Sheffield City council' (a large city in Northern England) in 2022, where they have been identifying children who are potentially eligible from welfare datasets and applying on their behalf since 2016. In Sheffield, all families whose children are identified as being potentially entitled to FSM from welfare data are contacted to let them know that the council will apply on their behalf unless the family indicates otherwise. In the first year of implementation, Sheffield estimated that they were able to register an additional 1,189 children for FSM, which also meant that schools received an additional £1,392,600 (€1,650,168, \$1,801,926) in Pupil Premium funding. When we heard this, it felt like a bit of a wake up call; something that should be done in all areas *and* that could be implemented by central government. However, we knew we needed solid evidence to back up this policy ask, so we set out to design an evaluation study that could drive informed, evidence-based decisions.

We have been conducting 'action-oriented' research since 2023^[5]; working with local governments in England to develop resources to enable other areas to implement autoenrolment approaches (which we call 'the Sheffield approach'). Our research aimed to evaluate both the implementation processes and the impact of auto-enrolment with 15 local governments. However, we were very quickly inundated with requests to join us and, by the end of 2024, had provided some level of support to 74 local governments across England. While all areas are primarily focused on doing the best they can to support families, many (especially those already providing universal free school meals) were also motivated to increase FSM registrations to ensure their schools receive the linked Pupil Premium funding.

Work to secure data on the number of additional pupil registrations and corresponding funding from participating local governments is underway. However, unofficial figures shared via their communication teams are already highlighting the significant impact of autoenrolment. By October 2024, approximately one third of areas that we were supporting (n-18) had set up auto-enrolment (one as a pilot in just 2 schools). In 17 of these areas that have fully implemented the auto-enrolment process, an average of 877 additional children have been registered for FSM per area in the first year of implementation. If we extrapolate these under an assumption that half are primary (and thus providing £648,980 for schools) and half are secondary school children (providing £460,425), this translates into an average of an additional £1,109,405 Pupil Premium funding per area. This estimation is likely to be conservative given that we anticipate that most non-registered children will be in primary schools. If we assume that all 74 areas we are currently working with will eventually launch auto-enrolment, extrapolation of early data suggests that approximately 65,000 additional children would be registered from FSM in the first year of implementation, (bringing in approximately £82M in Pupil Premium funding). Of course, we will understand how accurate these figures are when we receive the formal data.

It is important to note that these figures are based on first year implementation data and may decrease following initial implementation of auto-enrolment. However, while we expected the number of identified pupils to decrease following initial implementation, data suggest that this reduction may be smaller than we originally anticipated. For example, based on data from two areas, on average 1,191 pupils were identified during the first year, followed by 837 in the second, highlighting the continued need to implement processes each year. Moreover,

one area has observed a year on year increase in identification of children since implementing auto-enrolment, further emphasising the need for ongoing processes.

Perhaps just as compelling are the qualitative data that we have gathered from speaking to families, schools, local governments and national experts, which are further supported by our ongoing analysis of 144 auto-enrolment-related documents. The story is already clear – there is a lot of willingness to undertake FSM auto-enrolment processes; however, it is actually far from 'automated'. Local governments have put in a considerable amount of investment; not just to set up the processes, but to battle through the bureaucracy and legal challenges that they face... ""It feels very much like we are trying to do something underhand when all we are trying to do is support children [to] access a benefit to which they are legitimately entitled" [Quote from one local authority representative]. Given this level of local investment, we support advocacy in this area that is pushing for centralised approaches, where national data and processes are able to circumnavigate the need for local governments to battle against bureaucracy^[6–10]. In an age of 'efficiency', surely a centralised approach is a 'no brainer'?

The need for FSM auto-enrolment would not be negated by the expansion of universal free school meals to all children, as many are calling for [11, 18]. In fact, we would argue that auto-enrolment becomes even more important when all children are provided with FSM, given that the amount of Pupil Premium funding that schools in England receive is based on the number of children they have who are registered to receive means tested FSM. Universal provision will likely mean that registration for FSM becomes less of a priority for parents/carers when they are getting a free school meal anyway.

Through our work in this area, we know that there are many people working hard to do the best they can for children. However, there are multiple, systemic, barriers that still need to be overcome to ensure that school meals are able to fully support the growth and development of children. School food funding is not in keeping with the real price of a meal^[12]; food quality varies considerably and is not monitored^[13]; and priorities differ between governors, leaders, parents and children^[14]. We know that there is still plenty to do to ensure meals are of a high nutritional quality, whilst being feasible to procure, simple to cook and desirable to children (whilst also limiting environmental harm). But, there is also compelling evidence that having a school meal provides better nutrition than packed lunches^[15]. This is especially important for children living in areas of high deprivation, who are at greater risk of food insecurity and whose diets are poorer nutritional quality than those in more fortunate circumstances^[16].

National data indicates that children on free school meals get most of their recommended intakes of nutrients at school [17]. There is also growing evidence of the economic benefits of school meals [18], both to the families and the wider economy. Free school meals improve educational outcomes, leading to better productivity, higher lifetime earnings and greater contributions to the economy. They help to reduce healthcare costs linked to diet-related illnesses. The initiative also alleviates financial pressure on families and stimulates local economies by increasing demand in the food industry [18,19].

Since we started working in this area, the conversation has gathered pace in the UK, with many members of parliament (MPs) and other decision makers advocating for a centralised process to automatically register entitled children for free school meals rather than putting the burden on local governments^[7–10, 20]. The subject has been debated in the House of Commons (9th December 2024, 16th October 2024), and has been proposed within multiple policy recommendations, including the 2024 House of Lords Evidence Select report on Food, Diet and Obesity^[9]. Yet, despite this clear need to consider ways to enhance the system to ensure those who are entitled receive benefits, alongside growing evidence (including our FSM evidence), there remains a reluctance to push this forward by central and senior decision makers. Key to this is the notion of devolution, where central government has transferred the power and funding from national to local governments in England. We agree this approach ensures that policies can be more relevant to local communities. However, it should not be used as a way to devolve responsibility when the evidence points towards the need for central control. In the case of free school meals, the data that we are gathering consistently tells us that local governments are leading auto-enrolment processes to support their children, families and schools, despite the challenges and barriers that they face. implementation of the approach aligns with the UK Government mission of breaking down barriers to opportunities. Changing to a centralised system will require careful consideration of data sharing processes; however, it does not equate to a new welfare policy requesting more funding from the Treasury. Provided budgets are estimated appropriately based on entitlement, it feels like it should be a relatively easy win that makes a difference to families and children in greatest need.

Acknowledgements: We are particularly thankful to all of the dedicated local government representatives who have worked tirelessly to support free school meal processes and our research, with a special acknowledgement to Sheffield City Council.

Financial support: This work is supported by the FixOurFood programme (BB/V004581/1) funded by the UK Research and Innovation (UKRI) Transforming Food Systems Programme, within a specific call on health inequalities in the food system.

https://www.ukri.org/news/healthier-food-healthier-planet-transforming-food-systems

Conflicts of interest: Bremner is the CEO of Bremner&Co, a food policy and practice consultancy. Pidgeon is a Research and project officer within Bremner&Co. Goudie is a policy and advocacy manager of the Food Foundation, a registered charity advocating for change in the food system. Other authors report no conflicts of interest.

Authorship: MBryant: project conceptualisation; funding acquisition; methodology development, project oversight, developed first draft of paper. ROxley: data curation, data analysis, project management, writing, reviewing and editing paper. MBremner: funding acquisition; methodology development, project oversight, findings validation writing, reviewing and editing paper. CPidgeon: data curation, data analysis, writing, reviewing and editing paper. SGoudie:project oversight, finding validations, writing, reviewing and editing paper. BDoherty: funding acquisition, project oversight, writing, reviewing and editing paper.

Ethical standards disclosure: This study was conducted according to the guidelines laid down in the Declaration of Helsinki and all procedures involving research study participants were approved by the University of York, Department of Health Science Research Governance Committee (HSRGC/2023/586/H). Written informed consent was obtained from all participants.

References

- Department for Education. Pupils not claiming free school meals: 2013. https://www.gov.uk/government/publications/pupils-not-claiming-free-school-meals-2013 (accessed September 2024).
- 2. Dowler E, Turner S, Dobson B (2004). Poverty Bites: Food, Health and Poor Families. Child Poverty Action Group.
- 3. Sahota P, Woodward J, Molinari R, *et al.* Factors influencing take-up of free school meals in primary- and secondary-school children in England. *Public Health Nutr.* 2014;17(6):1271–9.
- Department for Education. Pupil premium: overview (n.d.). https://www.gov.uk/government/publications/pupil-premium/pupil-premium (accessed January 2025)
- FixOurFood. Sustainable and healthy food for children (n.d.). https://fixourfood.org/what-we-do/our-activities/schools-and-nurseries/ (accessed January 2025).
- 6. Parliament. House of Lords. Food, Diet and Obesity Committee (2024). https://committees.parliament.uk/oralevidence/14506/pdf/ (accessed January 2025).
- 7. School Food Review. Free School Meal Auto-Enrolment Letter to Damian Hinds MP (Minister of State, Department for Education) (2024). https://foodfoundation.org.uk/sites/default/files/2024-03/Auto-enrolment%20letter%20from%20all.pdf (accessed January 2025).
- North East Child Poverty Commission. Free school meals and auto-enrolment in the North East (2024).
 https://nechildpoverty.org.uk/content/images/uploads/NECPC_Schools_North_East_bri efing_FSMs_and_auto_enrolment_in_the_North_East.pdf (accessed January 2025).
- 9. Parliament. House of Lords. Recipe for health: a plan to fix our broken food system (Food, Diet and Obesity Committee report) (2024). https://publications.parliament.uk/pa/ld5901/ldselect/ldmfdo/19/19.pdf (accessed January 2025).

- 10. Lamb P. Free School Meals (Automatic Registration of Eligible Children) Bill (2025). https://bills.parliament.uk/bills/3781 (accessed January 2025).
- 11. The Food Foundation. 'The Superpowers of Free School Meals' (2022) https://foodfoundation.org.uk/initiatives/superpowers-free-school-meals (accessed March 2025).
- 12. Connolly A, Bryant M, Brinsden H, *et al.* A Better Deal for Free School Meals (2023). https://foodfoundation.org.uk/sites/default/files/2023-11/A%20Better%20Deal%20for%20Free%20School%20Meals.pdf (accessed January 2025).
- 13. Parnham JC, Millett C, Vamos EP. School meals in the UK: ultra-processed, unequal and inadequate. *Public Health Nutr.* 2023;26(1):297–301.
- 14. Bryant M, Burton W, O'Kane N, *et al.* Understanding school food systems to support the development and implementation of food based policies and interventions. *Int J Behav Nutr Phys Act.* doi: https://doi.org/10.1186/s12966-023-01432-2
- 15. Evans CEL, Cleghorn CL, Greenwood DC, *et al.* A comparison of British school meals and packed lunches from 1990 to 2007: meta-analysis by lunch type. *Br J Nutr.* 2010;104(4):474–87.
- 16. Loopstra R, Reeves A, Tarasuk V. The rise of hunger among low-income households: an analysis of the risks of food insecurity between 2004 and 2016 in a population-based study of UK adults. *J Epidemiol Community Health*. 2019;73(7):668–73.
- 17. Gregory J, Lowe S, Bates CJ, *et al.* Report of the diet and nutrition survey (2000). https://cir.nii.ac.jp/crid/1130282270588091008 (accessed January 2025).
- 18. Impact on Urban Health. Investing in Children's Future: A Cost Benefit Analysis of Free School Meal Provision Expansion Final Report (2022). https://urbanhealth.org.uk/wp-content/uploads/2022/10/FSM-Full-Report.pdf (accessed December 2024).

- 19. Impact on Urban Health. More Than a Meal: An independent evaluation of universal primary free school meals for children in London (2022). https://urbanhealth.org.uk/wp-content/uploads/2024/11/IoUH-Free-School-Meals-Report.pdf (accessed January 2025).
- House of Commons. Primary School Breakfast Clubs: Impact (2024). https://hansard.parliament.uk/Commons/2024-12-09/debates/FEEC481D-1A96-40FB-B321-01C419B6C08A/PrimarySchoolBreakfastClubsImpact (accessed January 2025).