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WORKING PAPER

School Food Case Study: Wales

Prepared by the Research Consortium for School Health and Nutrition, an initiative of the School Meals Coalition

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Country Profile

Population and economics

Table 1

Total population	Total number of population aged 5-19	Proportion of population employed in agriculture sector	Gross Domestic Product (GDP) per capita	Proportion of women in the workforce
3,267,501 ¹	545,000 ² (16.7% of total population)	3.2% ³ (higher than UK average of 1.1%)	23,882 USD	48% ⁴

Education

Table 2

Largely state funded and free-at-the-point-of-use at a primary and secondary level, education is compulsory for children in Wales aged five to sixteen years old. In 2021 there were 1,473 (94.8%) local authority-maintained schools and 80 independent schools (5.2%).⁵ It differs to some extent in structure and content to other parts of the United Kingdom, in particular with regards to the teaching of the Welsh language which is compulsory for students up to the age of 16. Wales does not have Academy schools, which are found in England (e.g., schools independent of the local authority). Wales has Welsh-medium schools which teach entirely in Welsh, and English-medium schools. Post-16 education (e.g., sixth form or A-Levels) is available for 16-18 years olds at some secondary schools. Alternatively, students can attend local authority maintained or independent further education colleges.

¹ ONS, 2022. Available at: <https://www.ons.gov.uk/>

² ONS, 2022. Available at: <https://www.ons.gov.uk/>

³ Welsh Government, 2019. Available at: <https://gov.wales/sites/default/files/publications/2019-06/agriculture-in-wales-evidence.pdf>

⁴ Stats Wales, 2021. Available at: <https://statswales.gov.wales/Catalogue/Business-Economy-and-Labour-Market/People-and-Work/Employment/Persons-Employed/statusofemployedpersons-by-welshlocalauthority-measure>

⁵ Welsh Government, 2021. Available at: <https://gov.wales/schools-census-results-april-2021-html>

In Wales there are three types of schools that provide free school meals under the 1996 education act:

1. Community schools or community special schools (e.g., for pupils with special educational needs) – these are owned and run by the local authority, and it is the local authority which sets the entrance criteria (such as catchment area) and decides which children are eligible for a place. These schools are also referred to as “maintained schools”.

2. Voluntary controlled schools – these are run by a voluntary organisation (in Wales this is typically the Roman Catholic Church or the Church in Wales) and yet closely controlled by the local authority. The local authority employs the staff and sets the entrance criteria, but the school land and buildings are owned by a charity (often the church) which appoints some members of the governing body.

3. Maintained nursery schools – are local authority-controlled schools for children who have not yet reached compulsory school age.

Food security, nutrition and health

➤ Stunting

NI-specific data not available – see England case study which reports UK data

➤ Obesity

- 60% of adults in Wales are overweight, of which 24% are obese⁶
- 26.4% of children starting primary school (ages 4-5) in 2017 were overweight or obese⁷
- 3.3% of children starting primary school (ages 4-5) in 2017 were severely obese – with Wales having the worst rates in the UK ahead of England (2.4%) and Scotland (2.6%)⁸
- The rate of obesity in Wales is at a level of significant public health concern

⁶ Public Health Wales, 2019. Available at: <https://phw.nhs.wales/topics/obesity/obesity-in-wales-report-pdf/>

⁷ Public Health Wales, 2019. Available at: <https://phw.nhs.wales/topics/obesity/obesity-in-wales-report-pdf/>

⁸ Public Health Wales, 2019. Available at: <https://phw.nhs.wales/topics/obesity/obesity-in-wales-report-pdf/>

➤ **Micronutrient deficiency**

NI-specific data not available – see England case study which reports UK data

➤ **Food insecurity**

Food security in Wales is similar to that of England and Northern Ireland, with 9% of people experiencing low food insecurity and 12% saying they cannot afford balanced meals.⁹

Design and implementation of school feeding programmes

Programme objectives

The program aims to provide free school meals to primary and secondary school children, from low-income backgrounds, who attend a local authority-maintained school. In 2021, 25.2% of children attending maintained schools were eligible for free school meals.¹⁰ As of September 2022 universal primary free school meals for all primary school children are being rolled out in a stepwise fashion starting with the youngest years. By 2024 all primary school aged children will be in receipt of free school meals. In addition, primary school children in participating schools are also eligible to receive free school breakfasts under the current provision. Free school meals are financed out of local authority budgets, including the revenue support grant, with local authorities holding the responsibility to arrange meal provision that follow nutritional standards. Furthermore, all school meal provision has a commitment to increase the range of food pupils eat, more Welsh food on Welsh plates with resulting benefits to the economy and should consider food waste reduction and recycling at source. The Welsh Government is determined that under their free school meal provision no child should go hungry and

⁹ Irdam, Porter and Draper, 2018. Available at:

https://www.sustainweb.org/news/apr18_food_security_wales/#:~:text=1%209%25%20of%20people%20in%20Wales%20experienced%20low,over%20to%20experience%20low%20food%20security.%20More%20items

¹⁰ Welsh Government, 2021. Available at: <https://gov.wales/schools-census-results-april-2021-html>

that the policy should reach as many children as possible, with continual reviews of the eligibility criteria to be able to extend eligibility as far as resources will allow.

Targeting and coverage

Wales has a parental income-based criteria for free school eligibility that is determined and set by the Welsh Government. Children must be in attendance at school full time, which extends the eligibility to full time nursery attendees and sixth form school pupils. However, with the move towards universal free school meals for primary school children in 2022, these criteria will only be used for provision of free school meals in secondary schools going forward.

To be eligible for free school meals (Table 1), as a full-time pupil between the ages of 3-18 years, the child's parents must receive income support (e.g., job seekers allowance, child tax credit, working tax credit, universal credit, jobseekers' allowance, immigration/asylum support or pension credit).¹¹ Although this is a national policy, local authorities manage and encourage applications for free school meals and ensure all maintained schools provide free school meals to all those eligible. As a result of local authorities being responsible for free school meal provision, this led to differences in coverage and method of provision during the COVID-19 school closures where children eligible for free school meals received either a food voucher, food parcels or direct bank transfers.¹²

Table 1

Table 1: Eligibility criteria by age group for free school meals in Wales				
	Nursery (>4 years)	Primary (4-11 years)	Secondary (11-16 years)	Sixth-form (16-18 years)*
Attendance				
Part-time	X	X	X	X
Full-time	✓	✓	✓	✓

¹¹ Welsh Government, 2019. Available at: <https://gov.wales/sites/default/files/publications/2019-03/free-school-meals-in-wales-information-for-schools.pdf>

¹² McIntyre *et al.*, 2021. Available at: <https://onlinelibrary.wiley.com/doi/epdf/10.1111/nbu.12556>

Meal type				
Breakfasts for participating school	✓	✓	X	X
Universal free school lunch (from Sept 2022)	✓ [†]	✓	X	X
School lunch for low-income households	✓	✓	✓	✓
* Within local authority maintained schools/colleges only				
† Only a local authority maintained nurseries where the child attends for at least one full day a week.				

Meal type

Hot meals (lunch), breakfasts, milk and snacks are provided within local authority-maintained schools. However, breakfasts are only served in participating primary schools. The type of food provided within these meals is regulated by legislation.¹³ School meals are commonly prepared onsite through full production kitchens run by the school. In a small number of schools, meals are transported in from larger schools or a central production unit ([Welsh Local Government Association](#)); which is often the case in smaller rural primary schools.

Nutritional norms

The [Healthy Eating in Schools Regulations 2013](#) details the standards school must be upheld in every maintained school, and are made up of recommended dietary allowances targets. There are different nutritional standards for lunch and breakfast within the legislation, but all must provide and promote healthy eating and drinking. Free of charge drinking water must be available at all times, but any water containing sugars, flavourings or colouring is not permitted. Drink standards apply across the whole day and not just at mealtimes.

¹³ The Healthy Eating in Schools Regulations, 2013. Available at: <https://www.legislation.gov.uk/wsi/2013/1984/contents/made>

Free breakfast service in nursery and primary schools should consist of milk-based drinks or yoghurts, cereals - not coated or flavoured, fruit and vegetables, breads, and toppings. Semi-skimmed milk is not permitted to be served within nursery school.

For lunch average limits are set on the amount of energy the school meal must provide, maximum amount of fat, saturated fat, non-milk extrinsic sugars and sodium and the minimum level of nutrients. The guidance is also split into unrestricted and restricted food categories, with defined portion sizes and limits based on stage of education (e.g., nursery, primary, co-educational secondary school, girls only secondary school and boys only secondary school).

Table 2

Unrestricted food categories	<ul style="list-style-type: none"> • Vegetable (provided daily). • Fruit (provided daily). • Fish (provided once a week). • Meat (provided twice weekly).
Restricted food	<ul style="list-style-type: none"> • Potato and potato products (provided no more than twice a week if cooked in oil). • Deep-fried or flash-fired foods (provided no more than twice a week). • Meat (no more than twice a week). • Cakes and biscuits (At lunch time only). • Salt (restricted where necessary). • Condiments ($\leq 10\text{ml}$).
Non-permitted food categories	<ul style="list-style-type: none"> • Confectionary and savoury snacks. • Salt (Not to be added after cooking).

Food procurement

There is no specific procurement food system in Wales. However, Welsh Government will be working with partners to increase the supply of Welsh food onto the school plate. This aims to shorten supply chains and reduce carbon emissions, support local food producers and distributors, and strengthen the Foundational Economy through grant funding to local authorities for delivery of universal provision and the significant investment to providing a catalyst for this work to begin in earnest.

There are opportunities to calibrate supply with demand and ensure more Welsh fruit and vegetables are served in school meals. Strengthening links between producers and wholesalers can help and provide routes to market. There is opportunity to develop a

mindset that focuses on value creation through food procurement, rather than cost savings. New legal guidance on buying local and sustainable food, which will be available in the autumn, can help support this. Also, the Social Partnership and Procurement Bill expected to come into force in 2023, represents a real opportunity to strengthen approaches in food procurement and data reporting. On 11th July, the Minister for Social Justice announced £3 million Welsh Government funding to support the development of cross-sector food partnerships and strengthen existing food partnerships that can help build resilience in local food networks through the co-ordination of on the ground, food-related activity which tackles the root-causes of food poverty.

Our Foundational Economy unit is planning a programme of work to support further improvements in food procurement across the Welsh public sector, ensuring a more co-ordinated and consistent approach to help get food firms 'public sector ready'. This includes a new Public Sector Food Programme and Public Sector Food Strategy for Wales, as well as extending learning from recent local, sustainable food pilots.

We are learning from other promising practice across Wales. For example, Carmarthenshire Council has worked to shorten supply chains, reduce carbon emissions and improve links between players in the food supply chain to better understand local supplier capacity. Efforts in Monmouthshire Council and the wider Gwent region offer learning, where they have developed a hyper-local understanding of grower and supplier capability within authorities. This work aims to improve data collection and resilience of local food supply chains.

Legal framework and policy evaluation

The legislation detailing the provision of free school meals is covered by the 1996 education act. In 2018, the Welsh Government started to revise the free school meals policy, due to the recognition that the current policy was failing to meet all children in relative income poverty.¹⁴ Wales, at this time was lagging behind with their free school meal policy, with Ireland having a universal basic income cut off twice that of the Welsh cut off. Furthermore, Scotland and England were already providing free school meals to all children below the age of seven years.¹⁵ These reforms led to the introduction of

¹⁴ Bevan Foundation, 2018. Available at: <https://www.bevanfoundation.org/views/free-school-meals-wales-policy-need-reform/>

¹⁵ Bevan Foundation, 2018. Available at: <https://www.bevanfoundation.org/views/free-school-meals-wales-policy-need-reform/>

universal free school meals in September 2022, which is a £260 million investment; with £200 million from revenue (£40 million 2022-23, £70 million in 2023-24 and £90 million in 2024-25) and £60 million in capital funding.

Provision of free school meals, promotion of healthy eating and adherence to national standards is the duty of the local authority and governing body.¹⁶ Although not mandatory, annual certificates of compliance are submitted by the school catering managers to show that the nutritional standards are being upheld.¹⁷ However, attainment of standards are not routinely reported.

Costs, benefits and budgeting

Cost of implementation

There are 190 teaching days in one academic school year in Wales, however, those children with the greatest need receive a food provision over the school holidays. In Wales the cost of a school meal varies across local authorities with the range of cost being £2.15-£2.85 per meal. The cost of free school meals comes out of the budget allocated to the school by the local authority which covers the provision of education, building and ground maintenance, cleaning and special educational needs; but, there is variation in the amount of budget allocated (e.g., cost per pupil) based on local authorities and school needs.^{18,19} With the new universal free school meals for primary school children there is the need for investment to enable schools to have the facilities and the staff to provide the number of school meals required. The Welsh Government has pledged £260 million to cover these costs over three years.

Financing

Free school meals are publicly financed, through general taxation, by both the Welsh Government (80%) and Local Authorities (20%), as part of the education budget.²⁰ Under the means tested based systems the cost of free school meals to the Welsh Government

¹⁶ Welsh Government, 2014. Available at: <https://gov.wales/sites/default/files/publications/2018-12/healthy-eating-in-maintained-schools-statutory-guidance-for-local-authorities-and-governing-bodies.pdf>

¹⁷ Welsh Local Government Association, 2022. Available at: <https://www.wlga.wales/healthy-eating-in-schools#:~:text=How%20are%20school%20meals%20provided%20in%20Wales%3F%20Councils,caterers%20and%20schools%2C%20who%20employ%20catering%20staff%20directly.>

¹⁸ Audit Wales, 2020. Available at: <https://audit.wales/sites/default/files/2020-11/FSM-portrait-eng.pdf>

¹⁹ Welsh Government, 2018. Available at: <https://gov.wales/funding-schools-faqs-html>

²⁰ Welsh Government, 2018. Available at: <https://gov.wales/funding-schools-faqs-html>

is £38.9M per year,²¹ but with the extension of universal free school meals for primary school children the cost would increase by £140.7M per year, to a total of £179.6M.²²

Monitoring and evaluation

The Welsh government undertakes annual monitoring of free school meals via the Pupil level annual school census (PLASC). However, there has been little evaluation of the free school meals provision, uptake and impacts to date, with much of the assessments being undertaken at a UK level. It is well known that not every child takes up the offer of a free school meal due to long queue concerns, payment systems, wanting to be with friends and the stigma of being in receipt of free school meals. However, an assessment of the free school breakfasts indicated improved nutritional intake at breakfasts, improved positive attitudes towards breakfast²³ and reduced socio-economic inequalities in healthy breakfast consumption.²⁴ But the provision of free school breakfasts did not change breakfast skipping behaviour.²⁵

Wales is in a unique position with the new roll out of the universal free school meals for primary school children, allowing for the early development of an evaluation program which includes all the relevant stakeholders at the beginning of the process. The evaluation of the universal free school meals program, currently under development, will aim to take into consideration the short-, medium- and long-term benefits of the programme, both in terms of health and socio-economic benefits.

Lessons learned and best practices

There are a few unique initiatives in Wales, including:

²¹ Bevan Foundation, 2021. Available at: <https://www.bevanfoundation.org/resources/expanding-the-provision-of-free-school-meals-in-wales/>

²² Bevan Foundation, 2021. Available at: <https://www.bevanfoundation.org/resources/expanding-the-provision-of-free-school-meals-in-wales/>

²³ Murphy *et al.*, 2011. Available at: <https://pubmed.ncbi.nlm.nih.gov/20602868/>

²⁴ Moore *et al.*, 2013. Available at: <https://www.cambridge.org/core/journals/public-health-nutrition/article/impacts-of-the-primary-school-free-breakfast-initiative-on-socioeconomic-inequalities-in-breakfast-consumption-among-911-year-old-schoolchildren-in-wales/0B9B75E2101A29A3C2F127F30C07BB39>

²⁵ Murphy *et al.*, 2011. Available at: <https://pubmed.ncbi.nlm.nih.gov/20602868/>

- 'Food and Fun' School Holiday Enrichment Programme - School-based program delivered during the school holiday designed to promote healthy eating and physical activity²⁶
- Big Bocs Bwyd - Provision of food at 'pay at you feel' prices, with a school setting, along with education on cooking and growing food²⁷
- We have real opportunity **to learn from successful models of free school meal provision**. Common threads from these programmes are the importance of education and upskilling of staff and strong school leadership; involving children in tasting new dishes; modernised 'future generations' menus that are healthy, nutritious, and with the ability to embrace seasonality and flexibility to reflect provenance.

Challenges

The current criteria based free school meal provision is not always taken up by all eligible pupils, which is an ongoing challenge to streamline access and reduce stigma within schools, around receipt of free school meals. In addition, the current eligibility criteria is arguably too restrictive, with over half of children in poverty not being eligible for free school meals.²⁸ However, any expansion of free school meal eligibility will create administrative and workload challenges for local authorities and schools.

The introduction of universal free school meals different administrative, infrastructure and supply chain challenges to be able to provide meals for all primary school children. Schools and local authorities were able to adapt and learn from the change in provision of free school meals during the COVID-19 school closure. The Welsh Government, have provided investment to local authority to improve infrastructure, along with a phased roll out over three years. But The Bevan Foundation has suggested that allowing primary schools to serve healthy cold meals would speed up the roll out, rather than waiting for the school's ability to provide hot meals;²⁹ however, not all cold food

²⁶ Welsh Local Government Association, 2022. Available at: <https://www.wlga.wales/food-and-fun-school-holiday-enrichment-programme>

²⁷ Big Bocs Bwyd Case Studies, 2022. Available at: <https://www.bigbocsbwyd.co.uk/getting-started>

²⁸ Child Poverty Action Group. Available at: <https://cpag.org.uk/news-blogs/news-listings/wales-over-half-children-poverty-missing-out-free-school-meals#:~:text=Wales%3A%20Over%20half%20of%20children%20in%20poverty%20missing,take%20them%20over%20the%20eligibility%20threshold.%20More%20items>

²⁹ Nation Cymru, 2022. Available at: <https://nation.cymru/news/schools-should-get-go-ahead-to-serve-cold-food-to-speed-up-wales-universal-free-school-meals-roll-out-says-think-tank/>



maintains the same quality as hot food, and can be harder to produce/store. Further challenges are presented with the tight time scales to bring about legislative reform.

Related resources

- Welsh Government (2022). [Universal Primary Free School Meals \(UPFSM\)](#).
- Welsh Government (2014). [Healthy eating in maintained schools](#).
- Welsh Local Government Association. [Healthy Eating in Schools](#).
- Welsh Government (2018). [Funding for schools: FAQs](#)

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