

City of York Council
Equalities Impact Assessment

Who is submitting the proposal?

Directorate:	People		
Service Area:	Children's Services and Education		
Name of the proposal :	Delivery of KS2 Universal Free School Meals Pilot Project		
Lead officer:	Maxine Squire, Assistant Director, Education and Skills		
Date assessment completed:	08/10/2023		
Names of those who contributed to the assessment :			
Name	Job title	Organisation	Area of expertise
Lamara Taylor	Headteacher	Westfield Primary School	School leadership
Rachelle White	School Admissions Manager	City of York Council	Administration of pupil data and FSM eligibility checks
Sue Wilson	School catering adviser	City of York Council	Management of school catering services and school food standards

Step 1 – Aims and intended outcomes

1.1	<p>What is the purpose of the proposal? Please explain your proposal in Plain English avoiding acronyms and jargon.</p>
	<p>Implementation of a pilot project to extend universal free school meals to Key Stage 2 children. The project is designed to deliver on the Executive's election manifesto commitment to create a cross city alliance to address disadvantage and the cost of living crisis. Findings from the pilot project will then be used to inform any full city roll out of universal free school meals</p>
1.2	<p>Are there any external considerations? (Legislation/government directive/codes of practice etc.)</p>
	<p>The School Food Standards. Section 114A School Standards and Framework Act 1998 requires that food and drink provided to pupils at schools in England complies with certain nutritional standards. This standard applies across the whole school day, including breakfasts, morning breaks, tuck shops and after school clubs. Section 512 of the Education Act 1996 places a duty on maintained schools, academies and free schools to provide free school meals to pupils of all ages that meet the criteria.</p>
1.3	<p>Who are the stakeholders and what are their interests?</p>
	<p>Parents and carers in the two pilot schools who would be financially benefitted by not having to pay for a school meal/breakfast KS2 children who are not eligible for free school meals would have access to a free meal/breakfast School leaders and managers and catering companies. This will create some extra work however, also has potential benefits to increase the take up of meals and the potential impact this will have on pupils attendance, behaviour and concentration. Parents and carers not in the pilot schools will have an interest in the progress of the project and whether this will lead to whole city roll out. Community funders will be interested in the impact of their donations to the project.</p>

1.4	What results/outcomes do we want to achieve and for whom? This section should explain what outcomes you want to achieve for service users, staff and/or the wider community. Demonstrate how the proposal links to the Council Plan and other corporate strategies and plans.
	The pilot will provide evidence about the impact on providing universal free school meals on improving educational outcomes, health and well being of KS2 children. The pilot will explore the benefits for families in reducing the stigma associated with applying for free school meals and will help to tackle the pressures felt by families due to the cost of living crisis.

Step 2 – Gathering the information and feedback

2.1	What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights? Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.	
Source of data/supporting evidence	Reason for using	
Evidence from the DfE evaluation of the pilot of universal infant free school meals	This report led to national roll out of UFSM in KS1. This provides an evidence base about the benefits of providing universal infant free school meals.	
Learning from the implementation of Universal Free School Meals in Scotland using Normalisation Process Theory: Lessons for policymakers to engage multiple stakeholders	This report provides an evaluation of the roll out of infant UFSM and provides pointers for the successful implementation of an extension of UFSM including: Universal free school meals (UFSM) could improve children’s outcomes Evaluation of UFSM policies internationally is limited UFSM policies need to engage with multiple stakeholders adequately	

	<p>Policymakers must communicate the potential benefits to educational stakeholders</p> <p>Adequate monitoring and evaluation could help to improve communication.</p>

Step 3 – Gaps in data and knowledge

3.1	What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with.	
	Gaps in data or knowledge	Action to deal with this
	Data sets will need to be developed to support the pilot.	Engage with the universities to develop the evaluation framework for the pilot.

Step 4 – Analysing the impacts or effects.

4.1	Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.
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Equality Groups and Human Rights.	Key Findings/Impacts	Positive (+) Negative (-) Neutral (0)	High (H) Medium (M) Low (L)
Age		0	
Disability		0	
Gender		0	
Gender Reassignment		0	
Marriage and civil partnership		0	
Pregnancy and maternity		0	
Race		0	
Religion and belief		0	
Sexual orientation		0	
Other Socio-economic groups including :	Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?		
Carer		0	
Low income groups	The threshold for FSM means that many low income families are not eligible under the current FSM scheme. They would be benefitted by the pilot project and so access to a	+	H

	nutritious meal would be provided to low income groups who are above the threshold to access a free school meal.		
Veterans, Armed Forces Community		0	
Other	Children not currently eligible for free school meals will be able to access a meal	+	H
Impact on human rights:			
List any human rights impacted.			

Use the following guidance to inform your responses:

Indicate:

- Where you think that the proposal could have a POSITIVE impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups
- Where you think that the proposal could have a NEGATIVE impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this proposal has a NEUTRAL effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a proposal may be highly relevant to one aspect of equality and not relevant to another.

<p>High impact (The proposal or process is very equality relevant)</p>	<p>There is significant potential for or evidence of adverse impact The proposal is institution wide or public facing The proposal has consequences for or affects significant numbers of people The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights.</p>
<p>Medium impact (The proposal or process is somewhat equality relevant)</p>	<p>There is some evidence to suggest potential for or evidence of adverse impact The proposal is institution wide or across services, but mainly internal The proposal has consequences for or affects some people The proposal has the potential to make a contribution to promoting equality and the exercise of human rights</p>
<p>Low impact (The proposal or process might be equality relevant)</p>	<p>There is little evidence to suggest that the proposal could result in adverse impact The proposal operates in a limited way The proposal has consequences for or affects few people The proposal may have the potential to contribute to promoting equality and the exercise of human rights</p>

Step 5 - Mitigating adverse impacts and maximising positive impacts

5.1	Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is been done to optimise opportunities to advance equality or foster good relations?
<p>The positive impact of the pilot project will be tracked through the evaluation of the project. This will be used to inform any future scale up of the project.</p>	

Step 6 – Recommendations and conclusions of the assessment

6.1	Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:
<p>- No major change to the proposal – the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review.</p>	

- **Adjust the proposal** – the EIA identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.
- **Continue with the proposal** (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty
- **Stop and remove the proposal** – if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination it should be removed or changed.

Important: If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.

Option selected	Conclusions/justification
No major change to the proposal	The proposal is to run a pilot project. Learning from the pilot project will be used to inform any further considerations regarding equalities.

Step 7 – Summary of agreed actions resulting from the assessment

7.1 What action, by whom, will be undertaken as a result of the impact assessment.			
Impact/issue	Action to be taken	Person responsible	Timescale
Managing expectations about the continuation of the project after the pilot phase	Develop and deliver a comms strategy to cover the period of the pilot and the sharing of evaluation findings		

Step 8 - Monitor, review and improve

8. 1	How will the impact of your proposal be monitored and improved upon going forward? Consider how will you identify the impact of activities on protected characteristics and other marginalised groups going forward? How will any learning and enhancements be capitalised on and embedded?