

12 May 2025

Dear

ATISN 24539 Free School Meals

Information requested

Thank you for your request which I received on 16 March 2025. You asked for information on how Universal Primary Free School Meals (UPFSM) funding in Wales was allocated and provided to local authorities, specifically.

1. Of the reporting of UPFSM in 2022 *"£225m has been committed to secure its delivery over the next three years."*, how much was allocated to each local authority, with details split between capital and operational costs.
2. What financial commitment does Welsh Government have for UPFSM per local authority beyond 2025.
3. How was/is the amount calculated and how can the public be safe in the knowledge the money is sufficient for the local authority to provide the services they need to provide without putting additional pressures on their finances? Additionally, details on the funding rate per meal and how it is calculated.
4. Whether there are any guidance documents or implementation parameters that the local authorities are bound to follow in their implementation.

Our response

The information you requested is contained within the attached appendix.

Next steps

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit,
Welsh Government,
Cathays Park,
Cardiff,
CF10 3NQ

or Email: Freedom.ofinformation@gov.wales

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely

Appendix 1

Freedom of Information Request ATISN 24619 - Free school meals

1. Of the reporting of UPFSM in 2022 "£225m has been committed to secure its delivery over the next three years.", how much was allocated to each Local authority and can details be split between capital and operational costs if necessary.

The Access to Information Request, [FOI release 20025: Free School Meals | GOV.WALES](#), provides details of the funding allocated to roll out the UPFSM offer between 2022 and 2025. Whilst the majority of the UPFSM budget is used to formulate grant allocations to local authorities, the funding is also used to support wider programme costs.

Revenue Allocations

In terms of individual local authority revenue allocations, these were calculated using data from the Pupil Level Annual School Census and were based on the following criteria:

- Expansion numbers based on local authority roll out plans (all primary aged pupils on roll in relevant year groups minus free school meal (eFSM) and Transitional Protection (TP) pupils – as these learners' meals are already funded through local authority budgets)
- ~190 school days per year
- A defined meal unit rate of £2.90 for allocations during 2021-22, 2022-23 and 2023-24, increasing to £3.20 for allocations from 2024-2025
- 86% uptake

The allocations also included an admin fee which represented a fixed percentage value of the allocations for each year and did not change in line with actual numbers reported. The admin fee was set at 6% during 2022-23, 4% in 2023-24, 2% from 2024-25 onwards.

The following table provides each authority's revenue allocations for 2022-23, 2023-24, and 2024-25 as requested. Additionally, and to support the response to the second question submitted in your request, we have also provided allocations for 2025-26. Please note, however, that the revenue grant for universal primary free school meals is demand-led and payments made against allocations will have reflected the number of meals served in each local authority during each financial year.

Local Authority	2022-23	2023-24	2024-25	2025-26
Blaenau Gwent County Borough Council	552,521	1,402,715	1,897,615	1,950,949
Bridgend County Borough Council	816,056	1,866,781	4,344,989	4,715,771
Caerphilly County Borough Council	1,599,631	4,203,543	5,373,910	5,249,642

Carmarthenshire County Council	1,026,684	8,116,324	10,652,352	10,547,818
Ceredigion County Council	995,542	3,508,838	5,945,114	5,915,247
City of Cardiff Council	614,470	1,608,382	1,985,083	1,969,616
Conwy County Borough Council	807,685	2,230,642	2,928,023	2,903,490
Denbighshire County Council	331,178	1,661,935	2,883,223	2,856,023
Flintshire County Council	648,626	2,698,323	4,679,504	4,557,903
Gwynedd Council	795,965	2,952,944	3,450,161	3,403,227
Isle of Anglesey County Council	554,865	1,592,284	2,074,683	1,993,616
Merthyr Tydfil County Borough Council	478,851	986,121	2,092,283	2,071,483
Monmouthshire County Council	757,456	2,049,944	2,700,288	2,668,821
Neath Port Talbot Council	855,737	2,597,132	3,662,963	3,624,562
Newport City Council	1,482,095	4,023,830	5,329,643	5,412,843
Pembrokeshire County Council	1,167,326	2,917,461	3,848,031	3,759,497
Powys County Council	694,167	2,024,317	3,851,231	3,805,897
Rhondda Cynon Taf County Borough Council	1,767,062	4,635,905	7,681,128	7,609,661
Swansea (City & County of) Council	590,360	2,288,959	5,938,995	6,724,854
Torfaen County Borough Council	1,317,678	4,494,467	4,772,305	4,702,438
Vale of Glamorgan Council	727,988	2,003,619	2,626,688	2,636,288
Wrexham County Borough Council	740,043	3,123,294	4,037,366	3,978,698
WALES Total	19,321,986	62,987,760	92,755,577	93,058,344

Capital Allocations

The initial 2 years of funding in 2021-22 and 2022-23, were calculated using a similar methodology to that of the Education Improvement Grant. This is based on the number of pupils aged 3 to 18 and the number of schools in each Local Authority area for the previous year. From 2023-24 onwards, any capital funding provided has been awarded following receipt of individual project bids from Local Authorities. No allocations have been made directly to local authorities in 2025-26.

Local Authority	2021-22	2022-23	2023-24	2024-25
Blaenau Gwent County Borough Council	477,124	667,974		
Bridgend County Borough Council	1,162,705	1,627,787		688,143
Caerphilly County Borough Council	1,483,742	2,077,239		286,984
Carmarthenshire County Council	2,730,253	2,198,448		
Ceredigion County Council	1,570,320	798,300		
City of Cardiff Council	570,214	3,822,354	1,427,856	2,165,340
Conwy County Borough Council	889,111	1,244,756		
Denbighshire County Council	859,456	1,203,238	9,800	95,990

Flintshire County Council	1,262,167	1,767,034		
Gwynedd Council	1,121,603	1,570,244	60,000	80,000
Isle of Anglesey County Council	594,412	832,177		
Merthyr Tydfil County Borough Council	475,828	666,159		176,890
Monmouthshire County Council	609,318	853,045		
Neath Port Talbot Council	1,110,632	1,554,885	57,434	2,507,566
Newport City Council	1,277,744	1,788,842		
Pembrokeshire County Council	950,398	1,330,558		1,665,847
Powys County Council	1,099,255	1,538,958		
Rhondda Cynon Taf County Borough Council	2,026,096	2,836,535	2,470,000	1,875,000
Swansea (City & County of) Council	1,804,997	2,526,996	0	700,508
Torfaen County Borough Council	715,174	1,001,244	178,450	
Vale of Glamorgan Council	1,137,937	1,593,112		35,780
Wrexham County Borough Council	1,071,512	1,500,117		
WALES Total	25,000,000	35,000,000	4,203,540	10,278,048

2. What financial commitment does the WG have for UPFSM per local authority beyond 2025

Revenue funding of £93.5m has been made available to support delivery during the 2025-26 financial year. Local authority allocations are provided in the table above. Additionally, £5m capital funding is available to local authorities on a business case basis where required. Budgets beyond 2025-26 have not yet been agreed.

Further details on the budget for 2025-26 can be found here:

[Draft Budget 2025 to 2026 | GOV.WALES](#)

[Final Budget 2025 to 2026 | GOV.WALES](#)

3. How was/is the amount calculated and how can be public be safe in the knowledge the money sufficient for the local authority to provide the services they need to provide without putting additional pressures on their finances? I understand that there is a fixed rate per meal that is "regularly reviewed" by WG but I could not find know information on the specific amount and how they were calculated.

Please see response to question 1 for how local authority allocations are calculated.

A Strategic Integrated Impact Assessment is undertaken-as part of the budget setting process annually.

- For 2022-23, this is available under Annex D of [2022-23 Draft Budget Narrative](#).
- For 2023-24, this is available under Annex A of [2023-24 Draft Budget Narrative](#)
- For 2024-25, this is available under Annex A of [2024-25 Draft Budget Narrative](#).
- For 2025-26, this is available [here](#).

The unit rate per meal was initially set at £2.90. A unit rate review was undertaken, following which, the unit rate was revised to £3.20 per meal. Further details on work undertaken by the Welsh Centre for Public Policy to support this review is available here: [Maximising the benefits of universal primary free school meals | WCPP](#)

4. Are there any guidance documents or implementation parameters that the local authorities are bound to follow in their implementation?

In delivering Universal Primary Free School Meals, Local Authorities are provided with grant terms and conditions that outline requirements relating to the provision of school meals generally as well as specific elements relating directly to the provision of Universal Primary Free School Meals. A blank copy of the UPFSM Grant Terms and Conditions for 2025-26 are attached at Annex A below.

ANNEX A

Universal Primary Free School Meals Terms and Conditions of Grant

Purpose

Welsh Government completed its roll out free school meals to all primary pupils in September 2024.

This ambition was informed by our understanding that younger children are more likely to be living in relative income poverty. The commitment represents a transformational intervention and an important further step to reaching our shared ambitions of tackling child poverty and ensuring that children have at least one meal every school day. This is crucial in the current context of the increasing cost of living.

Alongside our aim to reduce household and child poverty are longer-term ambitions to reduce health inequalities and to support local, sustainable food production. This could increase the supply of Welsh food onto the school plate and help to strengthen our Foundational Economy. Evidence also points toward the more immediate benefits of universal free school meals including the potential to raise the profile of healthy eating across the whole school, increase the range of food pupils eat, improve social skills at mealtimes, as well as some benefits to behaviour and attainment. It will support our efforts to eradicate child poverty and will play an important role in tackling child hunger. It will also help to realise longer term benefits by instilling early in life healthy eating habits and attitudes that children will carry into adulthood.

Legislative position

The law relating to the provision of school meals, including free school meals, at schools maintained by local authorities is set out in sections 512 – 512A of the Education Act 1996.

Under section 512ZB of the Education Act 1996, local authorities are required to provide a free school lunch for eligible pupils. In Wales, pupils are eligible if:

- they attend state-maintained school on a full-time basis (in the case of registered pupils receiving nursery education they must be present for two full sessions on any day on which they attend school for there to be a duty to provide lunch on that day); and
- their families meet the eligibility criteria for the provision of free school meals, as detailed in the following link <https://www.gov.wales/free-school-meals-information-parents-and-carers> ;and
- a request has been made by, or on behalf of, the parent or pupil for free school meals.

In rolling out the universal offer this requirement will remain. In other words, those currently eligible through income/benefit related criteria (eFSM) or transitional protections (TP) will continue to be funded through local authority budgets (within the Revenue Support Grant).

A grant route, relying on the “wellbeing” powers in section 60 and 58A of the Government of Wales Act 2006 is being used to deliver the expansion of free school meals.

This grant offer and allocation is intended to support the delivery of Universal Primary Free School Meals to all eligible children during the 2025-26 financial year. It is provided on the basis that you continue to deliver your duty under the Education Act 1996 and the Free School Lunches and Milk (Universal Credit) (Wales) Order 2019 to provide free school meals to eFSM and TP learners.

Allocations

Your allocation for the period 1 April 2025 to 31 March 2026 is £*****. This is broken down as follows:

UPFSM - allocations	UPFSM - 2% admin cost - fixed
*****	*****

The allocation uses PLASC 24 data, and is based on the following:

- Expansion numbers (all primary aged pupils on roll minus eFSM and TP pupils)
- 190 school days per year
- £3.20 meal unit rate
- 86% uptake

The allocation also includes a 2% admin fee. This is a fixed value for the year and will not change in line with actual numbers reported.

Monitoring and Reporting Requirements

This will be treated as a **demand led scheme** with a **£3.20 unit rate** applying to the number of meals claimed.

For the purposes of numbers to be claimed, we will require you to collect snapshots of numerical data for a specific week during each month and then present the information to Welsh Government Officials by sending the monitoring form to the following mailbox:

school.funding@gov.wales

Data Collection Weeks	Information provided to WG by:
7 April – 11 April 2025	30 April 2025
12 May – 16 May 2025	30 May 2025
16 June – 20 June 2025	30 June 2025
7 July – 11 July 2025	31 July 2025
15 September – 19 September 2025	30 September 2025
13 October – 17 October 2025	31 October 2025
10 November – 14 November 2025	28 November 2025
8 December – 12 December 2025	31 December 2025
19 January – 23 January 2026	30 January 2026

9 February – 13 February 2026	27 February 2026
9 March – 13 March 2026	27 March 2026

We require you to collect take-up numbers for each day in the specified week and calculate an average as described in the example below. This will then be used to calculate the actual numbers to be claimed for that month.

Example

Step 1: Collect actual take up numbers for 7 April – 11 April 2025

Monday	1500
Tuesday	1600
Wednesday	1400
Thursday	1500
Friday	1600
Total:	7,600

Step 2: Calculate average daily number.

$7,600 / 5 \text{ days} = 1,520 \text{ meals per day}$

Step 3: Calculate monthly claim value.

$1,520 \times \text{£}3.20 \times \text{no. of active school days}^* \text{ in that month} = \text{monthly grant claim data}$

**Where the school is open to learners and serving meals*

*Please note – The data collection dates avoid school holiday periods. Should there be an inset day, unforeseen closure of school (e.g. snow/averse weather) during any of these periods, please calculate according to the number of school days in that week (e.g. if in the example above Monday was an inset day, the average calculation would be $6,100/4$) **or** calculate with data for the next full school week.*

A grant monitoring form is attached at **attachment 1**.

As this is demand led, where uptake is lower or higher than the 86% you have been allocated payments will be reduced or increased accordingly. This does not apply to the admin fee which is fixed at the value indicated above.

(Even though Welsh Government does not require all data collection to be presented, local authority data collection information will need to be available to view on Welsh Government's request for sampling and for future audit purposes).

Payment

Payments will be made using data captured in the grant monitoring form (as detailed above) as follows:

May Payment – to include total 2% admin fee and April numbers

August Payment - to include May, June and July numbers.

November Payment – to include September and October numbers.

February Payment – to include November, December and January numbers.

Additional Payment in May after year end - to include February and March numbers.

Other Important Information

Administration Fee

1. For the fourth year of delivery of UPFSM we have set the administration payment at a fixed 2% of each local authority grant allocation. This is normal with programmes of this scale and reflects the complexity in rolling out this offer.
2. The administration payment will be reviewed for subsequent years of delivery and is intended to cover (list not exhaustive) staffing time to process additional 'meal request forms' and to record data, staffing time to re-negotiate contracts where necessary, and increased marketing and communication with schools, families, and children. To review the administration payment, we need to capture information on expenditure through the monitoring form at Annex A.

Data capture

3. Eligibility for eFSM is used as a key deprivation/poverty identifier which is currently predicated on an application being made by/or on behalf of learners captured by the eligibility criteria (outlined above). It is used to inform budget allocations, to target support, to confer individual entitlements and is used to inform policy development and evaluation. It also informs the local government settlement calculations.
4. **Local authorities must continue to capture data on those pupils eligible under the existing free school meal eligibility criteria.** This will support the continued use of the eFSM identifier as a means of informing budgets, allocations, as well as entitlements and with a minimal risk to the quality of the data. It will also ensure that those currently eligible through income/benefit related criteria (eFSM) will continue to be funded by local authority budgets (within the Revenue Support Grant) and be able to access related entitlements or support because of their eligibility status.
5. **Local authorities must continue with or adapt their business-as-usual processes to ensure that families are supported to register for free school meals. Relevant data must be captured on local authority and school software systems** and Welsh Government will monitor this to ensure that data is being recorded accurately.
6. Welsh Government has not mandated use of a particular form or template to support families to register for free school meals. The process for collecting, processing, and storing data remains with the local authority who is the data controller.
7. In discharging their duty to provide free school meals to eligible learners, local authorities should satisfy themselves that they are complying with the legal requirements placed on them by The Education Act 1996 and that their

processing of personal data is in line with UK GDPR and the Data Protection Act 2018 (DPA).

Provision of food

8. The Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations (“the Regulations”) set out nutritional standards for an average school lunch and food and drink requirements throughout the school day.
9. Food and drink provided in all local authority-maintained schools, during a school day, including those provided under the UPFSM offer, **must meet the Regulations and be considered alongside the [Statutory Guidance for Local Authorities and Governing Bodies \(the “Guidance”\)](#) and the [Healthy Eating in Schools \(Wales\) Measure 2009](#).**

Supporting the supply of Welsh food/benefitting local economies

10. An important opportunity of the policy rationale for the introduction of UPFSM is to support the wider ambition for the procurement and promotion of local, sustainable, and healthy food. ‘Local’ could mean within your local authority, your region, or within Wales – the general aim should be that food is eaten as close to the point of production as possible
11. Food is of fundamental importance in Wales and has multiple dividends including strengthening the foundational economy through jobs and growth, improving security of food supply, being vital to health and wellbeing, and playing an influential role in helping Welsh Government to realise its net zero ambitions through the types of food that we eat and the shortening of supply chains.
12. Public sector food procurement plays an enormously important role in re-localising the food supply chain for schools and the UPFSM programme is a strong catalyst for this. Procurement should be as collaborative, open, and transparent as possible to ensure it is accessible for Welsh food businesses.
13. **Local Authorities should** ensure they follow the Welsh Government’s guidance: ‘[Harnessing the Purchasing Power of the Public Plate for a Healthier, Wealthier Wales – a Legal Guide to Embedding Sustainability into Food Procurement](#)’ for all food contracts/framework agreements, to ensure opportunities are maximised for Welsh food businesses and the principles of the Wellbeing of Future Generations Act (WFGA) 2015 are adopted so that positive socio-economic, environmental and cultural outcomes are achieved.
14. This guidance encourages greater emphasis on quality and provenance in food procurement. It embeds foundational economy approaches, will ensure greater weighting on social/wellbeing objectives and that contract award criteria includes wider benefits such as jobs/training, fair work, ethical trading,

reduced CO2 emissions, food produced within a certain radius, etc. and all are scored reflecting their importance.

15. **Local authorities should** seek opportunities to maximise the amount of local, sustainable, and seasonal food on school menus by working closely with Wales-based manufacturers/producers/wholesalers and collaborating with other local authorities where appropriate to aggregate demand.
16. Wholesalers play an important role in UPFSM, ensuring food is supplied in the volumes required and Welsh produce is increased, providing invaluable routes to market for smaller producers. Local authorities should collaborate with and look to influence wholesalers and their tier one suppliers to promote Welsh firms within their supply chains and ensure Welsh produce is stocked and supplied.
17. Local authorities (catering and procurement staff) will be expected to co-operate with any data-gathering and analysis exercises (within reason and with consideration of the time requirement) that Welsh Government initiates in relation to school food procurement and to provide the data required in a timely manner.

Food Safety

18. Food safety is paramount, and local authorities must ensure all food suppliers undergo food hygiene audits, possess the necessary food safety accreditation, and have an effective system in place for communicating food safety incidents/ concerns to other local authorities across Wales.
19. It is the responsibility of each school to comply with food hygiene law at all times. Schools are inspected by the local authority Environmental Health Department and a food hygiene rating is awarded. This is an indication of the standards of food hygiene found at the school at the time of the inspection. Food hygiene ratings are on a scale, where '5' is the top of the scale and means hygiene standards are very good and fully comply with the law and '0' is the bottom of the scale and means urgent improvement is necessary.
20. Schools are required to achieve and maintain generally satisfactory food hygiene standards rating of 3 or higher.

Eligibility for Universal Primary Free School Meals

21. The policy position is that:

All registered pupils in Reception to Year 6 at any school maintained by a local authority in Wales will be eligible for a free school meal.

All registered nursery age pupils attending a maintained school and are present for two full sessions (on a given day) per week will be eligible for a free school meal when in attendance on those days.

22. Maintained schools in Wales are made up of Community schools (the majority), voluntary controlled schools, voluntary-aided schools, and foundation schools. They also include faith schools (which fall into one of the voluntary categories) and can include middle schools, special schools, and Pupil Referral Units (PRUs).

- Eligibility for UPFSM will be based on the year group in which a pupil is currently being taught, not necessarily their age-based or 'expected' year group.
- Pupils in Reception to Year 6 with 'no recourse to public funds' (NRPF) are to be offered a free school meal so long as they are attending a school which is maintained by the local authority. Nursery pupils with NRPF attending a maintained school for at least two full sessions on any given day are to be offered a UPFSM when in attendance on those days.
- Pupils receiving their education other than at school (EOTAS) will be **eligible** for the offer of a UPFSM at the same time as the year group they would be in if they attended school. EOTAS learners can be dual registered (registered at both a school and a PRU) or solely registered with a PRU.
- Pupils attending independent schools will be **ineligible** for UPFSM.
- Pupils being electively home educated (EHE) will be **ineligible** for the offer of a UPFSM.

23. Nursery eligibility example:

Monday - morning plus lunch = not eligible for UPFSM on that day

Tuesday - morning and afternoon plus lunch = eligible for UPFSM on that day

Wednesday morning and afternoon plus lunch = eligible for UPFSM on that day

Thursday - morning plus lunch = not eligible for UPFSM on that day

Friday - lunch plus afternoon = not eligible for UPFSM on that day

Providing for pupils with special diets, medically prescribed and religious diets

24. In relation to providing school meals to learners with medically prescribed dietary requirements, most catering services require written evidence from a registered medical practitioner or dietitian in line with the definition of such requirements within [The Healthy Eating in Schools \(Nutritional Standards and Requirements\) \(Wales\) Regulations 2013](#).

25. We recommend that information regarding medically prescribed dietary requirements is collected in good time.

26. We encourage formalised roles and responsibilities within local authorities and schools to ensure that all those involved in the process of managing

special diets in schools are aware of their responsibilities and that information is shared accordingly.

Communications and Marketing

27. Welsh Government is continuing a national communications and marketing campaign to support delivery of the UPFSM offer. **Local authorities should continue to** work with Welsh Government and are encouraged to be aware of and to use the [Get help with school costs | GOV.WALES](#) campaign web page/available toolkits to align local and national messaging and ensure clarity for parents.

Programme Monitoring and Evaluation

28. **Local authorities should** work with Welsh Government to facilitate activities in respect of any programme monitoring and evaluation Welsh Government may seek to undertake in relation to the UPFSM offer. These activities are as follows:
- (a) provide, by secure means, to Welsh Government and/or its independent evaluators such data, information, and reports which we may reasonably require for evaluation purposes.
 - (b) Meet with Welsh Government Officials responsible for evaluation and any other representatives as reasonably required.

Quality Assurance

29. Welsh Government intends to conduct Quality Assurance reviews throughout the UPFSM Programme as appropriate and as such, each local authority may be called upon to undertake an independent review of their regional performance and consistency at any time, subject to providing reasonable notice. It is expected that local authorities must engage with and participate in an independent quality assurance review if notified of the requirement in year and given reasonable notice.