

Cabinet 24 th May 2023	 TOWER HAMLETS
Report of: James Thomas - Corporate Director Children's Services	Classification: Unrestricted
Recommendations for the delivery of Universal Free School Meals (UFSM) to secondary school pupils in KS3 & 4	

Lead Member	Councillor Maium Talukdor, Deputy Mayor and Cabinet Member for Education and Life Long Learning
Originating Officer(s)	Steve Nyakatawa – Director of Education Matthew Eady – Director of Commissioning and Culture Jenny Pittam – Head of Contract Catering Services Katy Scammel – Associate Director of Public Health
Wards affected	All wards
Key Decision?	Yes
Reason for Key Decision	Mayor's pledge to deliver UFSM to all secondary school pupils
Forward Plan Notice Published	28/03/2023
Exempt information	N/A
Strategic Plan Priority / Outcome	Strategic Plan 2022-26 Priority 1 Tackling the Cost-of-Living Crisis – No child shall go hungry. Priority 3 Accelerate Education – Every child achieves their best in education.

Executive Summary

This report provides a summary of actions taken and being taken to implement the Mayor's pledge to deliver UFSM to all secondary school pupils up to the age of 16.

Tower Hamlets will be the **first** Council to extend free school meals to **all** secondary school pupils up to the age of 16, having delivered a highly successful universal primary free school meal (FSM) offer for the last ten years. Studies have shown that a universal free school meal offer can:

- Support pupils who live in poverty but do not qualify for the National Free School Meal (FSM) offer.
- Increase the uptake of meals for eligible FSM pupils. It is anticipated that Tower Hamlets will benefit from similar results as Hammersmith and Fulham's UFSM pilot scheme where the take up of Eligible FSM almost doubled.
- Mitigate the impacts of household food insecurity and reduce health inequalities.
- Reinforce healthy behaviours through the daily provision of a high quality, healthy and nutritious meal.
- Support educational outcomes as there are positive associations between nutrition and cognitive function, behaviour and attainment.
- Support positive learning and improve behaviour for disadvantaged pupils – helping to narrow the attainment gap.
- Help to tackle poverty during the cost of living crisis – a FSM offer provides a financial saving of £550 per year per child. For a family with 3 children this would be a saving of £1,650 per year.
- Support increased levels of local employment in the school meals catering sector.

Following the findings of surveys completed in all 22 secondary schools on their capacity to deliver, recommendations are made on the proposed phasing of the project, the funding levels required to support a good quality nutritious meal offer to all pupils, support for schools, and associated Conditions of Grant. This will ensure consistency across all schools to maximise take-up of the project and provide accurate financial reporting.

The report also highlights key actions still to be implemented and further challenges to be overcome for the successful delivery of the project.

Recommendations

The Mayor in Cabinet is recommended to:

1. Agree to fund the meal price at **£2.90** per pupil per day rising to £3 in year 2 of the project.
2. Agree to a **3-phase approach** to launching the project to allow schools to prepare appropriately for the delivery of meals to all secondary school pupils.

3. Agree to fund the upfront investment costs for all the schools estimated to be a total of **£722,350** to ensure schools have the correct equipment and resources to increase their catering capacity.
4. Approve the **Conditions of Grant**, support provision and evaluation activities for schools. These will provide a clear and consistent framework on how to derive maximum benefit from the project (encouraging uptake of good quality nutritious school meals) as well as providing data to demonstrate maximum value for money for Tower Hamlets' investment in UFSM.

1 REASONS FOR THE DECISIONS

- 1.1 **£2.90** per meal will ensure that a consistent, compliant high quality meal can be provided to all pupils and that staffing costs are met by the additional hours required to ensure an efficient service delivery. The Board which consists of representatives from Secondary School Head Teachers, LBTH Finance, Public Health, Legal, Comms, Caterers & External Consultants have agreed that it is an initial credible level of funding. However, to meet the challenges of increasing food inflation and high London Living Wage pay rates, £3 per meal will be needed in Year 2 to ensure the standard of the food offer is maintained.
- 1.2 If schools don't have the time to invest in their services properly and in a timely manner then the success of the project could be jeopardised, leading to poor meal uptake due to long queues, inefficient services and a reduced quality food offer.
- 1.3 12 schools and academies have a level of initial investment required to meet the increased production of school meals. Schools have confirmed their budgets for next year and have no planned allocation for this investment. On this basis it is recommended that the council covers this cost for all schools to ensure a successful launch of the UFSM project.
- 1.4 Without **Conditions of Grant** and provision of practical support for schools, there is a risk that the standard of food offer will be inconsistent and less healthy, and take-up of the free school meal offer will be lower. This will consequently limit the health benefits the programme will bring to young people. In addition, if not monitored, funding claimed from the council may not be accurate leading to an overspend on the UFSM annual budget.

2 ALTERNATIVE OPTIONS

- 2.1 Schools have raised a concern about phasing the start of the project, with some pupils benefitting earlier than others. To mitigate the inequality of this situation, the council could make direct payments to schools/pupils for UFSM in the interim period. However, the Board including external caterers and professional consultants do not recommend this option as schools will not be ready. There may be long queues, possibly resulting in an adverse start to the project from a pupil perspective. Good positive comms around

the Councils decision to phase the project start dates should help to overcome this concern.

- 2.2 An alternative solution to phasing the project would be to delay the start until all schools are ready to deliver and launch in April 2024. However, this is not recommended as the Mayor has pledged to launch in September 2023 and this has been publicly announced.

3 DETAILS OF THE REPORT

3.1 Background

In May 2022 Mayor Rahman made a manifesto pledge to provide UFSM to all KS3 & KS4 Secondary Pupils. This commitment has since been reflected in LBTH's Strategic Plan 2022-26 with implementation planned from September 2023.

A Project Initiation Board was established to look into how UFSM could be delivered. The Board consists of representatives from Secondary School Head Teachers, LBTH Finance, Public Health, Legal, Comms, Caterers & External Consultants. A Catering Logistics Forum was also set up made up of School Head Teachers and Caterers to discuss/plan the logistics of the project.

A professional catering Consultancy was commissioned in December 2022 to conduct feasibility studies to determine the implications and capacity of the 22 secondary schools to feed every student a healthy lunch every day. The aim of the feasibility studies was to inform the Council's approach on the Secondary UFSM offer.

A survey was conducted in each school to review the current meal uptake, the current nutritional profile of the food served and key service parameters including serving times, kitchen production capacity, staffing levels and available dining space. The survey assessed whether each school could deliver the increased uptake required by the project with existing facilities. Where school facilities were not capable of delivering the increased meal numbers, the evaluation team identified and costed the additional equipment and staffing resources required to do so. The findings of the feasibility surveys were concluded in March and shared with the Board.

3.2 Key Objectives of the UFSM Project

Tower Hamlets currently funds UFSM for all primary school pupils and studies have shown that a universal FSM offer can:

- Support pupils who live in poverty but do not qualify for the National Free School Meal (FSM) offer.
- Improve uptake of meals for eligible FSM pupils.
- Mitigate the impacts of household food insecurity and reduce health inequalities.

- Reinforce healthy behaviours through the daily provision of a high quality, healthy and nutritious meal.
- Support educational outcomes as there are positive associations between nutrition and cognitive function, behaviour and attainment.
- Support positive learning and improve behaviour for disadvantaged pupils – helping to narrow the attainment gap.
- Help to tackle poverty during the cost of living crisis – a FSM offer provides a financial saving of £550 per year per child. For a family with 3 children this would be a saving of £1,650 per year.
- Supports increased levels of employment in the school meals catering sector.

3.3 National Context and evidence base

Tower Hamlets will be the **first** Council to extend free school meals to **all** secondary school pupils up to the age of 16, having delivered a successful universal primary school offer for the last ten years.

Tower Hamlets already has one of the country's highest benefits related FSM rates – at 40%. The threshold for benefits related FSM is £7,400 household income (before benefits) and many thousands of Tower Hamlet children live in households in receipt of benefits but not eligible for FSM.

Westminster Council have recently announced that they will provide FSM to children aged between 3 and 14 in an expansion of its FSM programme from September 2023. Southwark Council has agreed to provide FSM for one year to local secondary school pupils whose parents live on Universal Credit but don't receive FSM.

Hammersmith & Fulham Council has successfully piloted UFSMs in 2 small secondary schools (one SEN). The project was a success in that they increased the uptake of those already eligible for benefits related FSM from 39% to 68 % in just one year.

Recent evaluation of Hammersmith & Fulham's , "[Universal free school meals in secondary schools are a feasible and acceptable way to address food insecurity](#)", summarises the key findings. It provides recommendations on how to capitalise on the potential of universal free school meals to ensure no young person is too hungry to learn. Key findings included:

- School staff and parents/carers who have experienced universal FSM (UFSM) say the benefits outweigh the potential cost of supporting families who do not need financial help.
- Incentives for schools include its potential to improve concentration and behaviour during lesson time, stigma reduction, and an easier administration process.

- UFSM is feasible and acceptable in secondary schools, regardless of size or catering set-up, particularly with staggered lunchbreaks that many schools introduced during the Covid-19 pandemic.
- However, the current evidence-base for effectiveness and cost effectiveness of UFSM in secondary schools to address food insecurity is poor and needs more schools to pilot the scheme.

In March, the Mayor of London confirmed FSM would be extended to every child of primary age in a one-off £130 million programme. The scheme will come into effect from September 2023 and be offered across the capital for one year. Currently in England, universal free school meals are only free to children in KS1.

Children miss out on FSM if their household income, excluding benefits, is over the threshold of £7,400 a year even if their families receive universal credit.

3.4 Results of the Feasibility Surveys

3.4.1 School Dining

The surveys generated data gathered from the individual schools on student roll, sales, Eligible FSM numbers and overall meal uptake. The schools all operate different till systems and have differing levels of data granularity. The survey evaluated 2 key variables that directly affect each school's ability to deliver higher uptake:

1. Current Uptake – Eligible FSM usage and cash sales.
2. Resource requirements: Equipment and Staffing.

3.4.2 FSM Usage & Cash Sales

Schools manage cashless catering services to ensure there is no differentiation between cash paying and Eligible FSM students. Students who are not eligible for FSM pay cash at break and at lunch; their accounts are loaded on by parents / carers using ParentPay or similar.

Across the Borough on roll, the total number of pupils for KS 3&4 is 14,854. The Eligible Secondary FSM population is currently 6,357 students or 42.8% of the total. (*data from Oct 2022 mainstream school census*). A concerning statistic is that only 3,494 students use the FSM entitlement regularly. This means the Borough only has a 55% uptake on FSM and significant numbers of students are **not** using their entitlement.

In the UK on average FSM eligibility is 22.5% of students. This shows the importance of encouraging maximum uptake and supports the need for automatic Pupil Premium FSM enrolment in Tower Hamlets.

Without this, there will be a material effect on the number of meals paid for by the Borough when they should be funded via the Government.

3.4.3 Free school meal allocation across Tower Hamlets

There are varying prices attributed to FSM across Tower Hamlets. This depends on the school, the surrounding area and the contract, if any, with the catering contractor. Tariffs for the 2023/2024 academic year have not been confirmed but current prices range from £1.80 to £3.00.

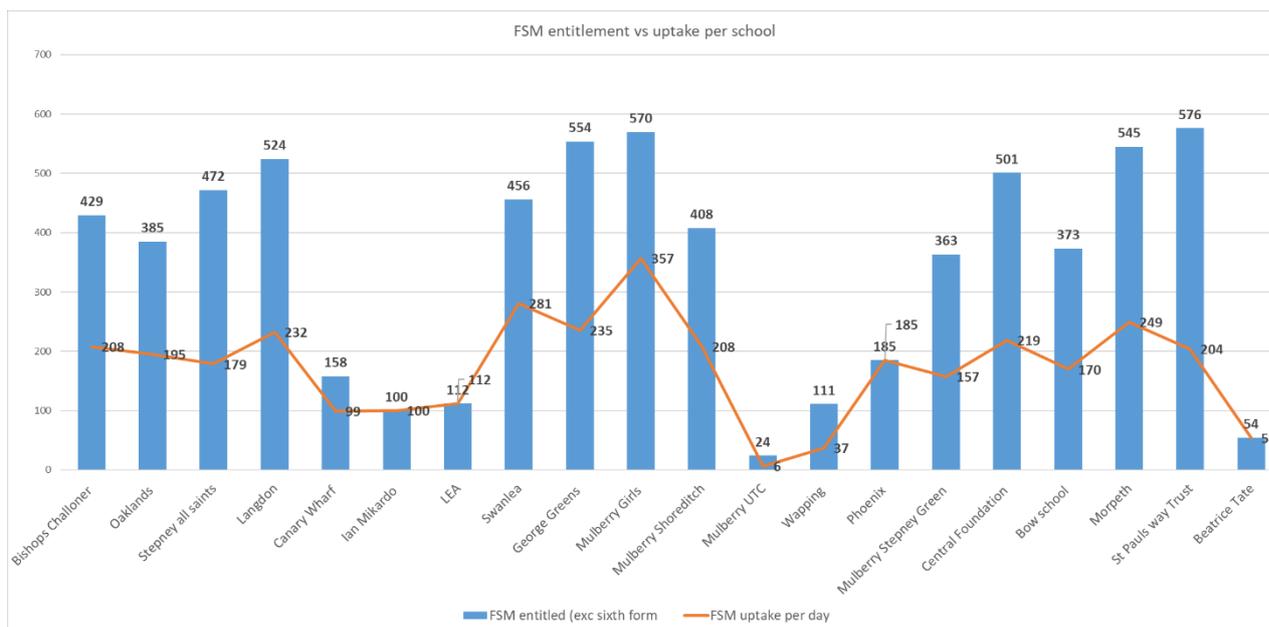
FSM values are allocated to student accounts in the morning of each day. Some schools allow student to use their allowance at morning break and lunch, others mainly at lunch. Ideally it is recommended that the UFSM offer is ringfenced and only used at lunchtime, however, with the increased take up of meals, it may be more practical for schools to offer the UFSM at morning break as well. This will enable more pupils to benefit from the UFSM offer and take the pressure off the dining hall at lunchtime.

3.4.4 Eligible FSM Entitlement & uptake

To gather accurate data on the FSM entitlement for each school the auditors evaluated the till reports as they link into SIMS and are anonymised. The average FSM eligibility across Secondary Tower Hamlets is 42.8% against the national average of 22.5%.

The current average uptake of the allowance is 55%. Only 4 schools in the borough serve every student every day – they are Ian Mikardo, London East Alternative, Beatrice Tate and Phoenix. They all deal with students with special needs, and they have smaller rolls than the other schools.

There are variable uptake rates across the schools for FSM. The chart on the following page shows that most of the schools are serving only half of their FSM entitled students. There is no data available on the eating patterns of the other half, or reasons for them not taking lunch every day.



Further pupil surveys and youth council engagement will be required to understand the reasons for students not taking their entitlement every day. Positive messaging and parent / carer communications will be needed to promote the benefits of a nutritious free meal every day. Practical support should be offered to schools to put in place effective policies and practices to increase uptake, as is happening with the primary School Food Improvement Programme.

It is anticipated that Tower Hamlets will benefit from similar results as Hammersmith and Fulham’s UFSM pilot scheme – though practical ‘hands on’ support and guidance was given to schools. The increase in take up of Eligible FSM almost doubled and this was put down to a change in the dining room culture. A lot more pupils went to the dining hall for a meal and Eligible FSM pupils no longer felt singled out by going there, possibly without their peer group with them. This will be a really positive outcome for this project if Tower Hamlet’s students adopt similar behaviours.

3.4.5 UFSM Take Up and Recommended Funded Meal Price

Based on School data, 57.2% of Secondary students, are not eligible for FSM and pay for their meals or bring in packed lunches. This student cohort will be eligible for funding from the Mayor’s project. The Mayor’s project, whilst aiming for 100% uptake, more likely will increase the overall uptake to between 75% and 85%. (On any school day, there will be pupil absences for example).

For the 2023/24 Financial year the LBTH funding formula funds Eligible FSM at £3.00 per pupil. This is higher than other councils but has the Tower Hamlets London weighting applied. The Council are recommended to agree to fund the UFSM meal price at £2.90 per pupil per day in the first instance rising

to £3.00 in the second year. The Board which includes external caterers and professional consultants have agreed that it is an initial credible level of funding.

£2.90 per meal includes all food, labour and material costs involved in delivering the additional meals but not capital expenditure. This price will ensure that a consistent, compliant high quality meal can be provided to all pupils and that staffing costs are met by the additional hours required to ensure an efficient service delivery. However, to meet the challenges of increasing food inflation and high London Living Wage pay rates, £3 per meal will be needed in Year 2 to ensure the standard of the food offer is maintained.

The cost projection in the table below assumes a funded meal price of £2.90 and 190 trading days per school per year.

Student type	Meals Per Day	Meals per Annum (190 days)	Cost @ 85% Uptake	Cost @ 80% uptake	Cost @ 75% uptake	Note
Total Pupils Eligible FSM	6,357	1,207,830	£2,977,301	£2,802,166	£2,627,030	Eligible FSM = Funded by the Government
Total Pupils Paid	8,497	1,614,430	£3,979,570	£3,745,478	£3,511,385	UFSM - Funded by LBTH
Total	14,854	2,822,260	£6,956,871	£6,547,643	£6,138,416	

Catering Contractors are increasing meal prices by 10% to 17% to compensate for the increases in costs due to food and wage inflation. With regard to other local benchmarks, the London Borough of Newham currently fund FSM Primary meals at £3. Contract Catering Services have a recommended secondary meal price of £2.70 until Sept 2023 when it will increase to £2.90.

3.4.6 Compliance with Government School Food Standards

The Government School Food Standards defines the nutritional content and portion sizes caterers must observe when operating in schools. It defines portion sizes, calorie intake and limits the number of days that fried foods and processed meats can be on the menu.

Compliance with the School Food Standard was assessed during the site surveys using the school's 2- or 3-week menus. **Appendix 1** details the School Food Compliance audit. School food compliance across the Borough is in need of improvement. Whilst the audit showed some compliance the actual quality of the food on offer in the schools varied significantly and high standards are in place in less than half of the schools surveyed. The average level of compliance is 75% excluding morning break but this should be 100%. In one school, only 56% of the food was compliant and none of the schools were fully compliant.

Morning break causes a degree of deviation from the School Food Standards and erodes the average compliance further to 73% including morning break.

The table below shows the survey scoring per school for morning break and lunch.

Including Morning Break		Excluding Morning Break	
School	Compliance	School	Compliance
Bow	67%	Bow	73%
Bishop Challoner	62%	Bishop Challoner	62%
Stepney	81%	Stepney	81%
Langdon	62%	Langdon	63%
Canary Wharf	79%	Canary Wharf	79%
Ian Mikardo	85%	Ian Mikardo	87%
London Enterprise	53%	London Enterprise	56%
Swanlea	83%	Swanlea	83%
George Green	85%	George Green	88%
London East Alternative	79%	London East Alternative	79%
Mulberry Girls	67%	Mulberry Girls	67%
Morpeth	67%	Morpeth	73%
Mulberry Shoreditch	67%	Mulberry Shoreditch	67%
Mulberry UTC	76%	Mulberry UTC	79%
Central Foundation	67%	Central Foundation	73%
St Pauls Way Trust	81%	St Pauls Way Trust	83%
Phoenix	85%	Phoenix	85%
Wapping	69%	Wapping	69%
Mulberry Stepney Green	68%	Mulberry Stepney Green	72%
Average	73%	Average	75%

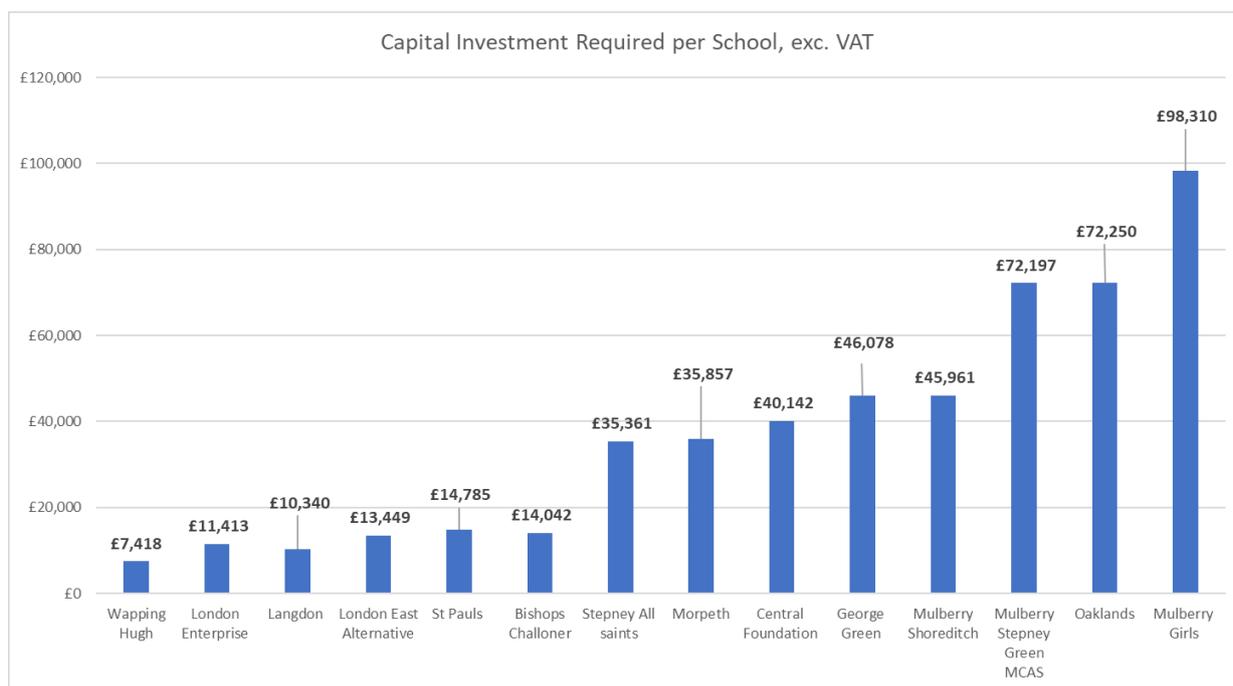
In addition to this, the sales mix in each school was assessed to understand the sales by product. The vast majority of schools have main meals and meal deals listed as top selling products but there are some products generating significant income that are not the healthiest products and should be sold less frequently. Given the Borough's commitment to healthy eating and promoting children's healthy weight, **a recommendation of the Mayor's funding will be that only school food standards compliant food can be offered as part of the UFSM food offer.**

3.4.7 Delivering the Project

The site evaluations were used to develop a detailed cost projection on the equipment that will be needed to ensure the UFSM project is delivered successfully. All schools were RAG rates depending on the equipment and staffing requirements needed. The following table shows how each school was RAG rated and the level of initial investment required needed to ensure a successful launch of the UFSM project.

The initial costs, before inflationally increases are listed below:

	Oaklands	Mulberry Stepney Green MCAS	Mulberry Girls	Total			
Exc Vat	£72,250	£72,197	£98,310	£242,757			
	Stepney All saints	Morpeth	Central Foundation	George Green's	Mulberry Shoreditch	Total	
Exc Vat	£35,361	£35,857	£40,142	£46,078	£45,961	£203,399	
	Wapping	London Enterprise	Langdon	London East Alternative	St Pauls Way	Bishops Challoner	Total
Exc Vat	£7,418	£11,413	£10,340	£13,449	£14,785	£14,042	£71,447
	Phoenix	Ian Mikardo	Mulberry UTC	Canary Wharf	Swanlea	Bow	Total
Exc Vat	£0	£0	£0	£500	£3,929	£5,995	£10,424



A schedule of equipment required in each school is detailed in **Appendix 2**.

In some schools, where dining space is limited, a number of new service points / outlets across the schools are recommended some of which are inside the school buildings and some outside. The equipment needs range from an additional hot counter and till to create an additional service point. Others are more complex and would need for counters to be moved from their current position and sited elsewhere. Others require external “pods” to be installed.

Additional Pod (basic fit out cost £20,388)

Morpeth
Central Foundation
George Greens
Mulberry Girls
Mulberry Stepney Green
Oaklands

Examples of Pods in Schools



Three schools have PFI contracts in place: two Mulberry Schools and Central Foundation Girls. This complicates the process of getting equipment into the school and where the asset sits in terms of maintenance and title. Additionally, where facilitation works are required such as gas / electrical / plumbing this would have to be arranged through the PFI contract. Should this be the case the agreement stipulates that there is likely to be an additional management fee surcharge (Mulberry Stepney Green MCAS have stated that this is as much as 14%) on the equipment costs.

3.3.8 Initial Funding

The total upfront investment costs for the schools was initially estimated to be £528,027 and this covered all the costs to ensure 12 schools have the correct equipment and resources to increase their catering capacity. This initial funding has since been revised to **£722,350** to reflect inflationary increases on all supplies and services and to include estimated contingency costs. The new costs are based on recent quotes from 3 catering equipment suppliers. **Appendix 3** details the price variances since the surveys were undertaken in January 2023 together with the estimated contingency costs. The council is recommended by the Board which includes the views of Head Teachers to agree to fund the upfront investment costs. Schools have confirmed their budgets for next year and have no planned allocation for this investment. On this basis it is recommended that the council covers this cost for all schools to ensure a successful launch of the UFSM project.

3.4.9 Proposed Phasing of the Project

Based on the RAG rating results, **the Board recommends that the project is launched in 3 phases as follows.**

Phase 1 – schools RAG rated dark and light green should go live in September 2023 and act as pilot schools for the delivery of UFSM (12 in total). These will be monitored for meal take up and issues such as queues in the dining hall and the quality of the food offered. Lessons learned and best practice will be shared in readiness for the next phase of schools to go live.

Phase 2 - schools RAG rated orange should go live in January 2024 (5 in total). These schools have proposed pods to install and the lead time for these to be ordered, delivered and installed means they will not have the capacity to successfully deliver UFSM to all pupils in September.

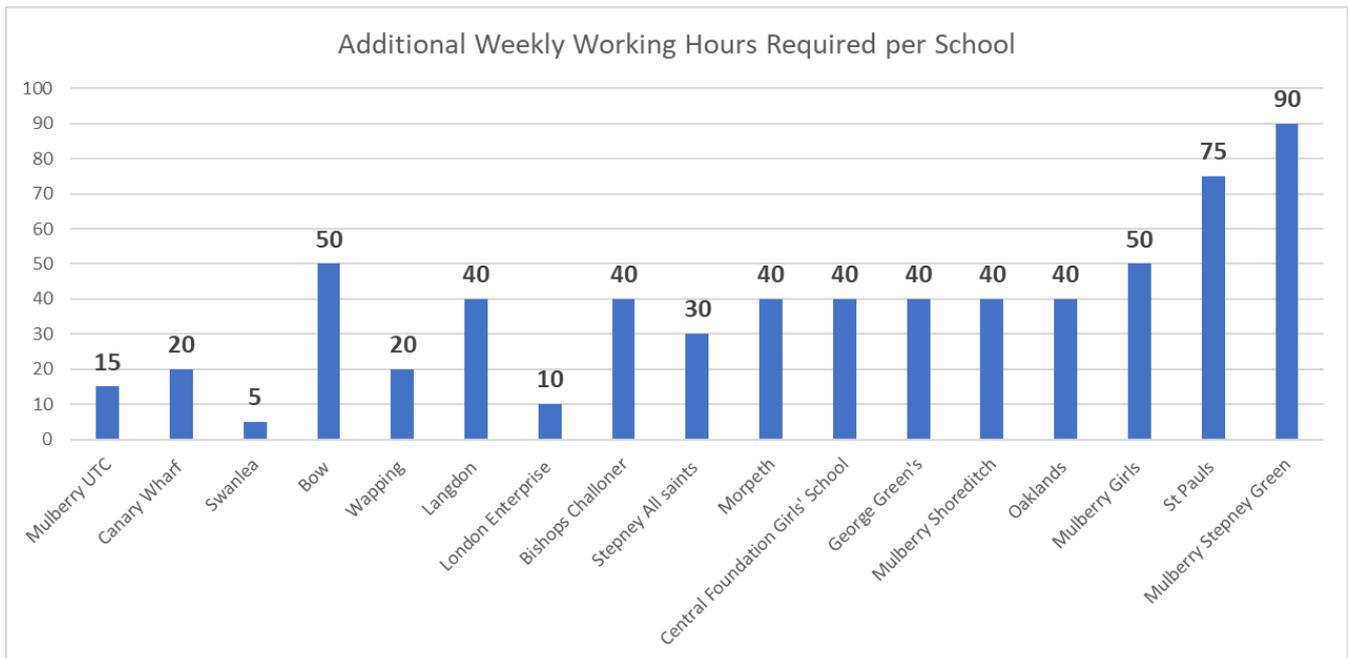
Phase 3 – 3 schools (Oaklands, Mulberry Stepney Green and Mulberry Girls schools) have the most complicated and costly changes to make to ensure their catering facilities have the capacity to deliver UFSM. It is envisaged that April 2024 will most likely be the best time for these schools to go live.

Schools have raised a concern about phasing the start of the project, with some pupils benefitting earlier than others. To mitigate the inequality of this situation, the council could make direct payments to schools/pupils for UFSM in the interim period. However, the Board including external caterers and professional consultants do not recommend this option as schools will not be ready. There may be long queues, possibly resulting in an adverse start to the project from a pupil perspective. Good positive comms around the Council's decision to phase the project start dates should help to overcome this concern.

An alternative solution to phasing the project would be to delay the start of the project until all schools are ready to deliver and launch in April 2024. However, this is not recommended as the Mayor has pledged to launch in September 2023 and this has been publicly announced.

3.4.10 Staffing Requirements for schools

The surveys carried out assessed what additional labour costs would be required to meet the increased production of school meals. The individual annual labour costs and additional 645 weekly working hours required per school are shown in the following tables:



The recommended £2.90 funding price will support this additional labour cost. However, if uptake is poor and there isn't sufficient revenue to support the labour cost, local school subsidies may increase if catering contractors can't deliver a break-even service.

3.4.11 Additional Support for Schools to prepare for UFSM

Additional external Catering Consultancy support was commissioned in April to further support schools in their preparations for delivery of UFSM in the following areas;

1. Equipment Purchase and Installation

- a. Based on the agreed specifications, equipment lead times are currently three months, so orders needed to be confirmed by May 19th, 2023, to ensure delivery, installation and commissioning by mid to late August.

2. Catering Operation Negotiations

A negotiation programme with schools and catering contractors taking 2 months to complete needed to start in April to ensure staff recruitment and induction plans are ready for the start of term. School recruitment effectively ceases during August so all new roles will need to be appointed in July for a September start. Other key areas to be negotiated between the school and the catering contractor are:

- a. Menus to ensure School Food Standards Compliance.
- b. Tariffs for main courses and meal deals to agree.
- c. Sales forecast to include at least 85% uptake for KS 3&4.
- d. Staffing levels and working hours required confirmed.
- e. To agree till reporting formats and data reporting frequency, to meet the Councils Schools Finance funding requirements.

3.4.12 Conditions of Grant

Tower Hamlets have an opportunity to apply appropriate Conditions of Grant to the secondary UFSM funding. (Associated Conditions of Grant have been in place for free KS2 primary meals since 2019).

Applying Conditions of Grant can provide schools with a clear and consistent framework on how to derive maximum benefit from the policy (encouraging uptake of good quality nutritious school meals) as well as providing data to demonstrate maximum value for money for Tower Hamlet's investment in free school meals.

Conditions of Grant must be easy and approachable for schools, rely on collectable and reportable set of Key Performance Indicators, and link into the wider evaluation activities. A summary of the proposed Conditions of Grant is details in **Appendix 4** but the main Conditions will include:

- Payment of universal meals will be made monthly in arrears by the Schools Finance team and only subject to presentation of actual meal numbers taken and till receipts available for inspection as evidence of sales.
- Payment of London Living Wage to all catering staff (whether contracted or in-house)

- Demonstrable efforts to increase school meal take-up rates

It is recommended that some additional practical, officer role or external professional consultancy support is provided to schools to help them deliver the universal FSM policy, especially in its first year of implementation. This will help ensure high take up of nutritious food and enable schools to provide relevant information to comply with the Conditions of Grant. (The cost of this additional support has not been budgeted for in the project). A continuation of a smaller Board could be agreed in order to oversee and report on the successful delivery of the programme particularly in the first year.

A cross-council Programme team, comprising respective departments (e.g. benefits, finance, education, public health, healthy lives, catering services) will work together to ensure that schools are provided with the most appropriate support to maximise take up and protect pupil premium.

3.4.13 Project Evaluation and Consultations

The project team are currently exploring opportunities to evaluate this new programme area. With it being the first borough in the UK to introduce such a policy there is significant national and academic interest.

There are several funding streams being explored.

The Genius School Food Network, a network of experts and academics working within UK school food research, have submitted a bid for National Institute of Health Research funding to support the council to complete a baseline before introduction in September. This will precede an application for an additional larger pot of funding to do a full process evaluation, starting after September 2023.

Evaluation of this programme will also be an important test of the potential for the new Tower Hamlets Health Determinants Research Collaboration (HDRC). The HDRC is establishing the infrastructure we will need to make research easier in the future, so we more fully understand the impact of our work on the health and wellbeing of local residents and can use this evidence and have evidence to inform future decisions. The HDRC could also help to raise the profile of this work locally nationally and internationally.

Before the programme launches, pupils will also be consulted to ensure the meal offer will meet their needs and lead to high uptake. As part of the baseline evaluation, a pupil survey will also be disseminated across all secondary schools in the borough that will reflect the key areas Tower Hamlet's want to evaluate - uptake. eating habits throughout the day (lunch vs mid-morning break), thoughts on school food provision and the impact of school food provision on eating habits outside of school hours. The broader evaluation will also focus on health inequalities, looking at whether the UFSM offer has had an impact on increasing uptake for eligible FSM pupils and

improved nutrition among individuals and communities facing greater health inequalities.

3.4.14 Other Project Implementation Challenges

Pupil Premium Funding

Headteachers have raised concerns that the Mayor's project could directly compromise Pupil Premium funding (and other school associated funding that is reliant on FSM pupil registration). The Pupil Premium funding is based upon FSM 'sign up' from Eligible parents / carers. Pupil Premium funding supports FSM entitlement, additional spending on teaching resources, teaching assistant support and specific projects in the schools. The Headteachers' concerns are that if a parent no longer has to sign up for Pupil Premium then funding will diminish substantially or simply be withdrawn.

The Council is currently considering options to provide better automation and 'opt-out' mechanisms in order to support schools – in addition to the government's Eligibility Checking Service, which most schools currently use. This will reduce the burden on schools. In Sheffield, this process has identified additional pupils who had not previously registered, as well as reduce administration for schools.

If this is not possible, then further incentive and support mechanisms will be provided to schools, drawing on national best practice, as well as the experiences of Tower Hamlet's primary schools.

Service Time Availability & Headteacher Concerns

Secondary Schools have varying amounts of time for lunch break, some are very short at 45 mins to the longest one being 2 hours. To ensure more students can enjoy a healthy lunch, where space is limited, a longer service time would allow every student to take up on a lunch. However, there is resistance to extending lunch breaks in some schools due to the need to drive academic excellence and maximize the time in lessons.

Many Headteachers are actively working to promote academic achievements post-covid. As a result, food service times have reduced to support this goal. Many schools are completing their school timetables for the 2023/2024 and once set; these are very difficult to change. There is concern that extending lunch breaks may reduce lesson times or alter the start / finish time of the day which is seen as unacceptable.

There is also concern about the current space available to serve lunches from, especially where the site is small and external space is at a premium. Where possible external pods have been proposed to alleviate time pressures. Should the lunchtime break not be extended, further investment in additional service outlets may be required to mitigate queuing times and the pressure on one dining room facility.

For some schools with limited space UFSM may be offered at mid-morning break. A freshly made hot and cold "Grab and Go" offer can still be compliant

and healthy and may be more suitable for those pupils who are busy at lunchtime. The healthy mid-morning break offer will also help to mitigate lunchtime queues.

Supervision of the lunch service is currently done by either duty teaching staff or paid lunch time supervisors. One of the concerns raised by the Headteachers was that there is an invisible additional cost to them that needs to be appreciated. If lunchtimes are extended due to increased numbers, or due to additional service points opening, so does the cost of supervision.

How the impact of low Free School Meal uptake supports the school's budget.

In 2022/23 schools received £2.89, rising to £3.00 in 2023/24 for each registered FSM pupil to go towards the cost of the school meal as part of their main budget allocation. When a FSM pupil does not take up their free meal, the school benefits from any residual unused funding.

1 EQUALITIES IMPLICATIONS

The offer of UFSM to all secondary school pupils will help reduce inequalities brought on by the high cost of living. The project will also support pupils who come from households with low incomes and will therefore provide targeted support to the most vulnerable in the current cost of living crisis.

The UFSM project ensures that all pupils, regardless of race, gender, disability, sexuality or other protected characteristics have access to a daily healthy meal whilst at school. Universal high-quality provision can reduce health inequalities, support positive learning and improve behaviour for disadvantaged pupils – helping to narrow the attainment gap.

2 OTHER STATUTORY IMPLICATIONS

2.1 Best Value Implications

The UFSM project will be monitored to ensure that schools comply with the Conditions of Grant. These will provide schools with a clear and consistent framework on how to derive maximum benefit from the policy (encouraging uptake of good quality nutritious school meals) as well as providing data to demonstrate best value for money for Tower Hamlet's investment in free school meals.

2.2 Consultations

There are no statutory consultations required in respect of this project.

2.3 Environmental (including air quality)

There are no environmental implications.

2.4 Risk Management

Risk will be managed by the Project Team and evaluations will be undertaken throughout the implementation of the project.

2.5 Crime Reduction

There are no crime reduction implications.

2.6 Safeguarding

There are no safeguarding implications.

2.7 Data Protection

There are no data protection implications.

2.8 [Report authors should identify any other specific issues relevant to consideration of this report. Including, but not limited to, the issues noted above. This section of the report can also be used to re-emphasise particular issues that Members must have considered before taking the decision (for example issues that may come up if an objection was taken to court). Note – Paragraph 5.1 MUST NOT be deleted.]

3 COMMENTS OF THE CHIEF FINANCE OFFICER

An initial estimate of costs was included as a revenue growth bid in the MTFs for 2023/24 for an introduction of Meals for all Secondary Schools from September 2024, however this was based on a lower meal price as food and salary cost inflation has increased significantly since the initial scoping exercise. Initial investment costs for Schools for equipment and serving facilities detailed in this report have also been additionally identified to the initial growth bid as the project has gained substance and detail of all levels of investment.

The initial costs of investment could be met from the current allocated budget and with the possible utilisation of PFI reserves for those schools currently within a PFI contract, However if we are able to include a growth item in the Capital programme that would be a more prudent application of funds.

As there is an urgency to ordering equipment the costs involved for the early implantation schools which are far lower would be required to be met from the revenue growth.

It would be recommended that as part of the budget setting process for 2024/25 more detailed analysis of uptake, meal prices and staffing requirements would need to be reviewed as the project matures to ensure future funding is adequate.

4 COMMENTS OF LEGAL SERVICES

4.1 The Council has the legal power (both in its own right and part of a wider public health function) to provide meals to attendees of it

4.2 The ability to recharge pupils for the meal provision is not mandatory and therefore the Council is legally entitled to waive recovery of the cost of the meal if it so wishes.

4.3 As the funder of the meal, the acquisition and provision of the meal is subject to the Council's statutory Best Value duty. Therefore, acquisitions for the creation of the meals (or where the meal is created by a contractor, the contractor itself) must be procured in accordance with the Best Value Duty and also to satisfy the Council's legal duties to subject its purchases to competition.

4.4 A school governing body is a contracting authority for the purposes of the Public Contracts Regulations 2015 and is also subject to the same Best Value duty as the main body of the Council. It follows that where the Council provides funding only to the school and the school enters into a contract for the purchase of the meal or the acquisition of the meal components then the school must also subject such purchases to an appropriate level of competition.

4.5 School provision in the borough includes school places made available at free schools and academies. The Council is restricted by law from providing "maintenance" to such schools as their funding is received directly from central government. Therefore, the Council will ensure that the funding of free school meals is legally compliant at free schools and academies.

Linked Reports, Appendices and Background Documents

Linked Report

- List any linked reports
- State NONE if none.

Appendices

- **Appendix 1** School Food Standards Audit
- **Appendix 2** Schedule of Equipment
- **Appendix 3** Revised Equipment & Estimated Contingency Costs
- **Appendix 4** Conditions of Grant

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- List any background documents not already in the public domain including officer contact information.
- These must be sent to Democratic Services with the report
- State NONE if none.

Officer contact details for documents:

Or state N/A

Appendix 1 School Food Compliance Audit

School Food Compliance Audit Document	Excluding morning break			Including morning break		
	Week 1	Week 2	Week 3	Week 1	Week 2	Week 3
Starchy food						
One or more portions of food from this group every day						
Three or more different starchy foods each week						
One or more wholegrain varieties of starchy food each week						
Starchy food cooked in fat or oil no more than 2 days each week (applies to food served across the whole school day)						
Bread - with no added fat or oil - must be available every day						
Fruit and vegetables						
One or more portions of vegetables or salad as an accompaniment every day						
One or more portions of fruit every day						
A dessert containing at least 50% fruit 2 or more times each week						
At least 3 different fruits, and 3 different vegetables each week						
Meat fish eggs and beans						
A portion of food from this group every day						
A portion of meat or poultry on 3 or more days each week						
Oily fish once or more every 3 weeks						
For vegetarians, a portion of non-dairy protein 3 or more days a week						
A meat or poultry product (manufactured or homemade and meeting the legal requirements) no more than once a week in primary schools and twice each week in secondary schools, (applies across the whole school day)						
Milk and Dairy						
A portion of food from this group every day						
Lower fat milk and lactose reduced milk must be available for drinking at least once a day during school hours						
Foods high in fat, sugar and salt						
No more than 2 portions a week of food that has been deep-fried, batter-coated or breadcrumb-coated (applies across the whole school day)						
No more than 2 portions of food which include pastry each week (applies across the whole school day)						
No snacks, except nuts, seeds, vegetables and fruit with no added salt, sugar or fat (applies across the whole school day)						
Savoury crackers or breadsticks can be served at lunch with fruit or vegetables or dairy food						
No confectionery, chocolate and chocolate-coated products (applies across the whole school day)						
Desserts, cakes and biscuits are allowed at lunchtime. They must not contain any confectionery						
Salt must not be available to add to food after it has been cooked (applies across the whole school day)						
Any condiments limited to sachets or portions of no more than 10 grams or one teaspoonful. (applies across the whole school day)						
Healthy drinks						
Free, fresh drinking water at all times						
The only drinks permitted are:						
<ul style="list-style-type: none"> • plain water (still or carbonated) • lower fat milk or lactose reduced milk • fruit or vegetable juice (max 150mls) • plain soya, rice or oat drinks enriched with calcium; plain fermented milk (for example yoghurt) drinks • combinations of fruit or vegetable juice with plain water (still or carbonated, with no added sugars or honey) • combinations of fruit juice and lower fat milk or plain yoghurt, plain soya, rice or oat drinks enriched with calcium; cocoa and lower fat milk; flavoured lower fat milk, all with less than 5% added sugars or honey • tea, coffee, hot chocolate 						
Combination drinks are limited to a portion size of 330mls. They may contain added vitamins or minerals, and no more than 150mls fruit or vegetable juice. Fruit or vegetable juice combination drinks must be at least 45% fruit or vegetable juice						
Categories met						
% compliance	0%	0%	0%	0%	0%	0%

Appendix 2 - Recommended Equipment

Red – Substantial implementation cost of over £60,000 per school.

Total Cost: £242,757 excluding VAT.

School	Mulberry Girls	Mulberry Stepney Green	Oaklands
Cost	£ 98,310.00	£ 72,197.00	£ 72,250.00
iCombi Classic 20 Grid 1/1 Electric	1	2	1
iVario model `L' Electric			1
Blue Seal 120 litre Bratt Pan Electric	1		
Tills	1	1	1
Fridge shelving		1	
Plates and cutlery Med	1.5		1
Pod PC cost	1	1	1
Hobart 40 L mixer	1		
Dishwasher double - Hobart	1	1	
Walk in fridge	1		1
Installation	2	2	2

Suggested Equipment

Amber – Significant implementation cost of between £20,000 and £60,000 per school.

Total cost: £203,398 excluding VAT.

School	Stepney All saints	Morpeth	Central Foundation	George Green's	Mulberry Shoreditch
Cost	£ 35,361.00	£ 35,856.80	£ 40,142.00	£ 46,078.00	£ 45,960.80
iCombi Classic 20 Grid 1/1 Electric	2			1	1
iVario model `XL' Electric					1
Foster 3 door counter fridge		3			3
Foster 2 door upright fridge				1	
Blue Seal 80 litre Bratt Pan Electric			1		
Blue Seal 120 litre Bratt Pan Electric	1	1		1	
Tills			1	1	2
Hotplate					1
Plates and cutlery Med		1	1		1.5
Pod PC cost		1	1	1	
Hobart 30 L Mixer			1		
Installation	3	1	1	2	2

Light Green – Large implementation cost between £5,000 to £20,000 per school.

Total Cost: £71,447 excluding VAT.

School	Wapping	London Enterprise	Langdon	London East Alternative	St Pauls	Bishops Challoner
Cost	£ 7,418.00	£ 11,413.00	£ 10,340.20	£ 13,449.00	£ 14,784.80	£14,042.00
iCombi Classic 20 Grid 1/1 Electric				1		
Foster 3 door counter fridge			2		3	
Foster 2 door counter freezer			1			
Foster 1 door upright freezer					1	
Foster 2 door upright fridge						1
Foster 2 door upright freezer						1
Blue Seal 80 litre Bratt Pan Electric	1				1	
Blue Seal 120 litre Bratt Pan Electric						1
Blue Seal 80 litre Bratt Pan Gas		1				
Tills		1	2			
Fridge shelving		1				
Hotplate		1				
Plates and cutlery Med			1			1
Installation	1	1	0	1	1	1

Dark Green – Minimal Implementation cost under £5,000 per school.

Total Cost: £10,424 excluding VAT.

School	Phoenix	Ian Mikardo	Mulberry UTC	Canary Wharf	Swanlea	Bow
Cost	£ -	£ -	£ -	£ 500.00	£ 3,929.20	£ 5,995.00
Foster 3 door counter fridge					2	
Tills						1
Fridge shelving						1
Hotplate						1
Plates and cutlery small				1		
Plates and cutlery Large						1
Installation	0	0	0	0	0	0

Appendix 3 - Revised Equipment & Estimated Contingency Costs

Equipment Required	Total No	Cost Jan 2023	Sept 2023 Cost - 7% inflation	Jan / April 2024 Cost Extra 5%
iCombi Classic 20 Grid 1/1 Electric	9	£ 103,041.00	£ 110,253.87	£ 115,766.56
iVario model `L` Electric	1	£ 13,801.00	£ 14,767.07	£ 15,505.42
iVario model `XL` Electric	1	£ 18,123.00	£ 19,391.61	£ 20,361.19
Foster 3 door counter fridge	13	£ 25,539.80	£ 27,327.59	£ 28,693.97
Foster 2 door counter freezer	1	£ 2,411.00	£ 2,579.77	£ 2,708.76
Foster 1 door upright freezer	1	£ 1,473.00	£ 1,576.11	£ 1,654.92
Foster 2 door upright fridge	2	£ 4,332.00	£ 4,635.24	£ 4,867.00
Foster 2 door upright freezer	1	£ 2,413.00	£ 2,581.91	£ 2,711.01
Blue Seal 80 litre Bratt Pan Electric	3	£ 16,254.00	£ 17,391.78	£ 18,261.37
Blue Seal 120 litre Bratt Pan Electric	5	£ 32,315.00	£ 34,577.05	£ 36,305.90
Blue Seal 80 litre Bratt Pan Gas	1	£ 5,418.00	£ 5,797.26	£ 6,087.12
Tills	13	£ 19,500.00	£ 32,500.00	£ 34,125.00
Fridge shelving	3	£ 1,500.00	£ 1,605.00	£ 1,685.25
Hotplate	3	£ 5,985.00	£ 6,403.95	£ 6,724.15
Plates and cutlery small	1	£ 500.00	£ 535.00	£ 561.75
Plates and cutlery Med	8	£ 8,000.00	£ 8,560.00	£ 8,988.00
Plates and cutlery Large	1	£ 2,000.00	£ 2,140.00	£ 2,247.00
Pod PC cost	6	£ 123,000.00	£ 131,610.00	£ 138,190.50
Hobart 30 L Mixer	1	£ 9,724.00	£ 10,404.68	£ 10,924.91
Hobart 40 L mixer	1	£ 10,099.00	£ 10,805.93	£ 11,346.23
Dishwasher double - Hobart	2	£ 45,598.00	£ 48,789.86	£ 51,229.35
Walk in fridge	2	£ 40,000.00	£ 42,800.00	£ 44,940.00
Installation	20	£ 40,000.00	£ 42,800.00	£ 44,940.00
Survey and Planning for Install, 10 days maximum			£ 5,000.00	£ 5,250.00
POD Slabs and Electrics, £5k each			£ 30,000.00	£ 31,500.00
POD				
Softeners for Combi Ovens			£ 2,500.00	£ 2,625.00
Installation costs increasing			£ 7,000.00	£ 7,350.00
CFGS combi oven (change of contractor)			£ 16,000.00	£ 16,800.00
				£ -
TOTAL COSTS		£ 531,026.80	£ 640,333.68	£ 672,350.36
Estimated Contingency Cost allowance			£ 50,000.00	£ 50,000.00
		£ 531,026.80	£ 690,333.68	£ 722,350.36

Appendix 4 Proposed Conditions of Grant

Condition of Grant	RATIONALE and HOW TO REPORT
Provide actual take-up rates for KS3 & KS4 on a monthly basis	<ul style="list-style-type: none"> • Ensure that funding only provided to actual school meal uptake • Schools to provide monthly uptake reporting through to Finance team.
Commit to provide FSM to all those Eligible and make all efforts to maximise uptake	<ul style="list-style-type: none"> • Current benefits related FSM uptake is only at 50% • Annual certification statement (submitted to School Food Improvement Manager (SFIM)/ Finance Team) • School food take-up rates
Commit to spend all the grant on school lunch	<ul style="list-style-type: none"> • Annual certification statement • Schools able to demonstrate that all funding is spent on any of the following: Food Ingredients and disposables, kitchen and other catering related staffing costs, utility costs, kitchen capital, monitoring and quality assurance.
Meet requirements of national school food standards	<ul style="list-style-type: none"> • School Food Standard are variable quality • Annual certification statement asks for: • Name of senior lead teacher / governor with responsibility for school food • School Food Policy published • School conducts termly checks on menu compliance and food serving time observations. • Scheduled Environmental Health Officer / Food Safety Officer visits include question on how school monitors and reports on meeting school food standards
Sustainability Standards to be incorporated into Procurement contracts and Service level agreements	<ul style="list-style-type: none"> • Tender specifications to be checked by School Food Improvement Manager • To discuss with Pilot schools additional potential to involve Tower Hamlets Climate change / sustainability team
Pay London Living Wage	<ul style="list-style-type: none"> • Annual certification statement • Review catering contracts to ensure LLW incorporated. • Finance team to ask for compliance annually
Commitment to support evaluation of the grant each term	<ul style="list-style-type: none"> • Provide evaluation data to help demonstrate best value for money for Tower Hamlet's investment in free school meals.