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Free School Meals

Explaining forthcoming policy changes and helping your council towards full enrolment



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DIALOGUES

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Our dialogues publications are a series of think pieces supported by the partners of CCN. This report is sponsored by Basis and Bremner & Co.

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Foreword



As the impact of the cost-of-living crisis continues to affect families up and down the country, schools have been reporting a rise in the number of children coming to school hungry.¹ That is why last summer the Government announced its intention to extend the entitlement to free school meals (FSM) to every child in a household in receipt of Universal Credit – a move that will extend FSM to over half a million more children, and provide benefits to families of up to £500 a year², as well as allowing local areas to draw down additional funding such as pupil premium into schools.

Beyond the benefits to individual children and their families, this also has significance for local authorities and schools. For many years, FSM registration has been used as a proxy measure for disadvantaged school funding such as the Pupil Premium. But only those pupils actually registered to receive FSM are able to attract this additional funding, meaning there is an imperative for councils to encourage take up of the entitlement to both maximise the welfare of communities, as well as boost investment in local education services. Research has suggested that under-registration rates could be as high as 11% of all entitled children.³

Whilst the new Education White Paper confirms the Government intends to consult on how to identify and allocate disadvantage funding, this will not take place for some years. With considerable changes to the national FSM policy, it is imperative that all councils and schools are able to register all FSM pupils – it is

such an important funding lifeline for families and schools.

There is an urgency to this issue, though, if we are to be ready for the start of the school year in September. In order to support its member councils in this, CCN has teamed up with sector specialists to advise how take up of FSM can be improved in their area. Basis and Bremner & Co have already worked with a number of councils across the country to help with this task, including within county areas operating under the two-tier system.

The following paper in CCN's Dialogues series, sets out a brief background of the present FSM system and the recent changes proposed by the Government set to come into effect this autumn. It then goes on to describe more practically the journey that other authorities have been on in order to improve take up in their respective areas.

As the testimonies in this paper show, these authorities have achieved substantial economic and social benefits from engaging in the process.

Cllr Bill Revans,
Leader Somerset Council
CCN Spokesperson for Education

Executive Summary

Far too many children who are entitled to free school meals (FSM) are missing out because of complex bureaucracy and the stigma that can come with applying. Previous estimates suggest up to 11% of children entitled are not registered.⁴

That's children and funding slipping through cracks of a system that should be there to support them. It does not have to be this way.

Across the country, a growing number of councils are adopting an 'opt-out auto-award' approach to FSM registration. This means councils and schools work together to identify and register entitled pupils for FSM and only remove pupils from the registration list if they choose to opt-out.

The impact is immediate and significant and valuable for families, schools and councils. Families save up to £500 a year per entitled child, while local schools become eligible to receive vital, additional, disadvantage funding through the Pupil Premium and related grants, worth up to £3,000 per pupil. It can also help councils to identify families in their area that need additional support in other areas beyond FSM (e.g. school uniform grants or holiday activities)

In September 2026, FSM entitlement is expanding by an estimated half a million children - with the introduction of a new

FSM grant ('Expanded FSM'), coupled with the ending of transitional protections for some. These changes will create additional administrative challenges for schools and families. It's critical no children are missed.

In order to help its member councils understand these reforms to FSM, CCN have teamed up to produce this report in partnership with the organisations Basis and Bremner & Co. These specialists have come together to work directly with six councils over the past three years, (including county authorities) to implement secure and legally compliant opt-out systems and support councils in helping their residents and schools to access money they are entitled to. In total, these six projects have identified more than 4,000 additional eligible pupils and unlocked over £9 million in new funding for schools.

For councils, this represents a rapid and substantial return on minimal investment, while ensuring that national government funding reaches the children and communities it is intended to support.

With the September 2026 changes fast approaching, councils must act now to see the benefits in the forthcoming school year 2026/7. This document explains the policy changes happening in more detail and sets out how your local authority can be supported to implement an effective opt-out auto-award system and ensure that no child misses out.

Background

Feeding children well must be the bedrock of good civil society. Beyond simply being the right thing to do, there is ample, undeniable evidence connecting good health and nutrition to improved learning, development, and wellbeing outcomes across the life course.⁵ In addition, FSM is an important proxy for school funding – being registered for FSM unlocks significant extra funding and support for schools.

There are many children who are entitled to these benefits for themselves and their schools, but who are not registered and are missing out.

The national policy landscape has shifted to recognise the importance of investing in our next generation:

- **Child Poverty Strategy:** The publication of the national strategy, 'Our Children, Our Future', in December 2025 confirmed that all children living in households receiving Universal Credit will be entitled to receive a FSM – an additional 500,000 children will benefit.⁶
- **Legislative Action:** The introduction of the Children's Wellbeing and Schools Bill places a renewed, intense focus on child welfare.⁷
- **The Government's Opportunity Mission:** This core mission aims to break the link between young people's background and their future success.⁸

Local authorities will want to respond to all of these initiatives and crucially, implementing an opt-out auto-award process for FSM represents a rare 'win-win' for county councils.

Unlike long-term, complex policy interventions that take years to show results, local auto-enrolment is a ready-made, proven process that can be deployed rapidly. It allows councils to immediately deliver on this national legislation at a local level, rapidly unlock millions in vital school funding, and provide instant relief to vulnerable families.

Currently, families have to proactively apply for FSM, and in practice, many don't. Research indicates applicants face barriers related to shame and perceived stigma. This is a failure of service design.

In other instances, many working families on Universal Credit simply don't realise they are entitled, or incorrectly fear that by claiming they might affect other benefits they are in receipt of.

However, identifying and encouraging claims by eligible families is not just the right thing to do for individual families – it also maximises critical disadvantaged funding for school budgets at a point when many maintained schools are having their budgets squeezed. This includes the Pupil Premium grant, Ever 6 and the FSM grant itself to provide the meal. This adds up to around £3,000 per additional pupil identified and registered.

Forthcoming changes to FSM eligibility

Complicating the current situation, there are two significant policy changes arriving in September 2026, which will make registering for FSM even more complex for families. They are:

- the expansion of FSM (called ‘Expanded FSM’); and
- the ending of FSM transitional protection.

A summary of these changes are included in the table below.

September '26 policy change	The details	The risk	Why this matters
Entitlement for FSM expands to all households receiving Universal Credit	The current £7,400 income cap is being removed, meaning anyone on UC will become eligible for FSM.	Thousands of working families on UC will become eligible overnight. Many will not realise they qualify and will not apply for FSM.	In both instances, many children will likely fall through the cracks and miss out on FSM and additional funding for their school.
Transitional protection ends	The safety net that keeps children on FSM – even if parent/carer income increases – will be removed.	Families losing transitional protection may ‘drop off’ the scheme. They may become entitled under the new UC rule but not realise it.	

With the introduction of the new Universal Credit FSM cohort (called ‘Expanded FSM’) in September 2026, an estimated half a million additional children will become entitled to support.⁹ This figure excludes early years children and those in further education or school sixth-forms. The true number of newly eligible pupils will therefore be significantly higher.

This expansion creates an operational challenge for both schools and local authorities. Without a proactive system in place, councils must prepare for:

- A surge in parental/carer queries directed at already stretched school offices.
- An increase in new FSM applications requiring manual processing by schools and/or council teams.
- Highly sensitive frontline situations, such as children arriving at school expecting a free meal when they have unexpectedly fallen off the eligibility list.
- Increased operational pressure on local authorities that provide FSM eligibility checking services to schools. Where councils offer these services (as recommended in DfE guidance), a surge in new eligibility criteria and transitional protection drop-offs will require them to rapidly scale administrative capacity to support schools in managing the influx. For councils implementing opt-out auto-award approaches, this work exercises their statutory powers under the Education Act 2005 to verify eligibility via the Eligibility Checking System.



A Proven 7-phase Roadmap

The Department for Education (DfE) has previously stated that a fully centralised, national auto-enrolment system comes with "*complex data, systems, financial, and legal implications.*"¹⁰ Because of this, the government currently relies on local authorities to set up local data-sharing agreements and opt-out models.

This can place a heavy burden on councils.

Since 2023, Basis and Bremner & Co have supported six local authorities to implement an opt-out auto-award process, including two county councils. They are currently working with a third county council to implement this process.

The Basis/Bremner & Co approach to opt-out auto-award is a 7-phase process, as described below:

SEVEN PHASES TO INCREASING FREE SCHOOL MEAL TAKE-UP

- 1. Stakeholder Mapping:** Engagement and buy-in, getting the right people from across the council to agree on roles and sketch out the process.
- 2. Data Protection Approval:** Working with the council's legal teams to ensure statutory compliance and identify the right legal gateways.
- 3. Collect Council Data:** Coordinating access to relevant data sets.
- 4. Match data:** Coaching internal data analysts to conduct the matching process to identify entitled families and finalise the lists of eligible households.
- 5. Opt-out:** Ensuring legal compliance by giving families the opportunity to opt-out.
- 6. Registration:** Sending the final lists of entitled pupils to the schools.
- 7. Impact Reporting and handover:** Assessing the success of the approach, identifying savings and refining the process for future years.

Devon County Council

Devon County Council commissioned Basis and Bremner & Co to support it in improving take up of FSM by local families. In October 2025, this project successfully implemented an auto-enrolment process that identified 1,064 pupils entitled to FSM but not registered, which unlocked £1.4 million in new additional Pupil Premium funding for their schools.

Because this process was embedded into their work as 'business as usual', Devon now continues to automatically identify additional eligible pupils every single month on an ongoing basis without further support or consultancy costs. This is reflected in the additional pupils and Pupil Premium funding accrued in the first three months of the system operating, as shown in the table below:

	Sept 2025	Oct 2025	Nov 2025	Jan 2026	Total so far
# pupils identified	1,064	328	302	26	1,720
Pupil Premium funding gained	£ 1,424,696	£439,192	£404,378	£34,814	£2,303,080

"Thank you for all the support from Basis and Bremner & Co through this project. Your team played a pivotal role in ensuring Devon's team successfully completed the opt-out auto-award initiative. The structured approach, clear communication and collaborative mindset you brought helped us navigate challenges with confidence and maintain a positive outlook from start to finish."

Jack Newton, Deputy Director - Inclusion and Learning, Devon County Council

Gloucestershire County Council

In January 2026, Gloucestershire County Council identified 591 entitled but unregistered pupils, representing a 3.45% increase in Gloucestershire's total FSM population. This will unlock approximately £730,000 in Pupil Premium funding. This was for one moment in time and Gloucestershire now have plans to run the data matching process every month, which will likely identify additional pupils and funds over time.

Generating return on investment

To put the financial gains into perspective, identifying roughly 40 eligible pupils across a county is enough to cover the full cost of commissioning Basis and Bremner & Co.

When looking at the initial £1.4 million unlocked in Devon against the project costs, the immediate return on investment for the council was approximately 2,570%. It is even more than this, if additional disadvantaged funding the school receives is factored in. Crucially, this calculation is likely to be an underestimate. This ROI is based strictly on the Pupil Premium funding unlocked. It does not include the additional FSM grant money that schools will also receive for these newly registered pupils. The true financial return is therefore significantly higher.

Because the process is now embedded internally, those financial returns, in addition to the number of families supported, continue to compound month on month. Ultimately, opt-out auto-award is a self-funding initiative that rapidly redirects millions of pounds back to the frontline schools that need it most.



While the immediate financial returns are significant, the secondary impacts of introducing an opt-out auto-enrolment process deliver profound, long-term value across the council. So far, projects conducted by Basis and Bremner & Co across six English councils have resulted in over 4,000 pupils being identified and registered across early years, primary, and secondary age groups.

This has unlocked over £9 million in Pupil Premium funding, alongside additional FSM and Ever 6 funding for schools.¹¹ Crucially, the opt-out auto-award process becomes embedded in each council's business as usual, ensuring that children continue to be proactively identified and registered year after year without ongoing external intervention.

Improving and using data

Local authorities and schools are actively leveraging the data generated from this matching process to drive wider strategic goals. Councils are using this insight to:

- Develop a far deeper understanding of local demographics and pinpoint hyper-local levels of deprivation.
- Support targeted reductions in inequalities across the county.
- Foster integrated working across previously siloed council teams.
- Strengthen relationships and build trust with local schools.

Beyond FSM, councils are also using the data outputs from this work to inform other critical programmes and priority areas they are operating. This includes shaping targeted interventions to support 'Good Levels of Development' targets,¹² as well as enabling the highly targeted application of the Holiday Support Fund¹³ and the Crisis Resilience Fund.¹⁴



Targeting Inequalities

Opt-out auto-award is highly effective at reaching the most marginalised communities. In Southwark, 2024 data matching found that 63% of pupils entitled to FSM live below the poverty line. Of the pupils identified:

- 86% came from lone parent households.
- At least 45% came from Black, Asian, Mixed or 'other' ethnic backgrounds.
- 35% did not speak English.

This shows the importance of opt-out auto-enrolment to help identify some of the country's most vulnerable children.

The Two-tier context

It is worth highlighting that some local authorities have held the belief that county councils are 'too complex' to easily do this because of the two-tier structure with different responsibilities split between district and county. However, as the case studies in Devon and Gloucestershire overleaf show, this is not the case.

It is entirely possible, and already it can be seen that counties can deliver this approach just as effectively as unitary councils. There does not even necessarily need to be direct involvement of districts – as the process can all be done centrally/via the county council.

There is also no need for any fancy systems to collect or run the data matching process. While some councils that Basis and Bremner & Co have worked with have used specific data management systems, others have been able to complete the process using an Excel spreadsheet.

Adding value

Delivering a project that touches data, legal, and education teams is difficult, especially when everyone is already working at capacity. Council officers rarely have the spare time or headspace to project-manage a complex, cross-departmental initiative from scratch, especially with the uncertainties surrounding exactly how the September 2026 policy changes will need to be operationalised.

This is the core value Basis and Bremner & Co have brought to the councils they've worked with. They provide the dedicated project management, technical data coaching, and coordination needed to successfully implement an opt-out auto-award process.

Connecting the dots between teams is rarely just a technical exercise. Instead, it requires a deep understanding of how policy actually works in practice. Basis and Bremner & Co also bring the knowledge and connections into government to support with any additional details or changes provided by the DfE between now and September regarding how to operationalise the policy changes. This ensures they can help councils stay ahead of the curve, keeping council processes compliant and effective regardless of how the national landscape shifts.

Next Steps

The upcoming September 2026 changes to FSM eligibility demand immediate preparation. Opt-out auto-enrolment is a chance for local governments to proactively remove barriers, reduce inequalities, and deliver support that truly changes children's lives.

We recommend that county councils immediately:

- Make sure Cabinet and CMT leaders actually understand the scale of the policy changes coming in September.
- Don't wait for the surge. Put a plan in place now to handle the volume of new claims and the sensitive drop-offs.
- Get in touch with Basis and Bremner & Co to explore how to successfully embed a compliant, impactful opt-out auto-enrolment process before the deadline hits.



1. <https://www.theguardian.com/education/2023/aug/31/teachers-gave-food-hungry-pupils-england-survey>
2. **UK Government Press Release** (<https://www.gov.uk/government/news/over-half-a-million-more-children-to-get-free-school-meals>)
3. **Child Poverty Action Group Website 'Behind the numbers: free school meals'**
<https://cpag.org.uk/news/behind-numbers-free-school-meals>
4. **DfE (2013) Pupils not claiming Free School Meals**
(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/266339/DFE-RR319.pdf).
5. **Impact on Urban Health (2022). Investing in Children's Future: A Cost Benefit Analysis of Free School Meal Provision Expansion**
(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/266339/DFE-RR319.pdf);
World Health Organisation Website: 'Health Topics: Nutrition'
(<https://www.who.int/health-topics/nutrition>).
6. **Cabinet Office (2025) Our Children, Our Future: Tackling Child Poverty**
(<https://assets.publishing.service.gov.uk/media/696646bc99fbd498faecd98/child-poverty-strategy.pdf>)
7. **Department for Education (2024) Children's Wellbeing and Schools Bill. Policy Summary Notes** (updated January 2026)
(<https://assets.publishing.service.gov.uk/media/695e578a8ab0677c14afdfc9/childrens-wellbeing-and-schools-bill-2024-policy-summary-notes.pdf>).
8. **Prime Minister's Office (2024) Break Down Barriers to Opportunity**
(<https://www.gov.uk/missions/opportunity>)
9. **Department for Education (2025)**
(<https://educationhub.blog.gov.uk/2025/06/expanding-free-school-meals-what-parents-need-to-know/>).
10. **UK Parliament (2023) Free School Meals – Question for Department for Education**
(<https://questions-statements.parliament.uk/written-questions/detail/2023-03-14/165185/#:~:text=The%20Department%20has%20not%20made,implications%20to%20such%20a%20change.>).
11. Whilst this work unlocks three funding streams (Pupil Premium Funding (PPF), FSM Grants, and Ever 6), ROI cited here has only been calculated using PPF. This ROI calculation is based on a single year of PPF funding. Since PPF is often recurrent, the long term value of this project is significantly higher.
12. **Crown Copyright (Nov 2025) Early years foundation stage profile results**
(<https://explore-education-statistics.service.gov.uk/find-statistics/early-years-foundation-stage-profile-results/2024-25>)
13. **Department for Education (2025) Website: 'Guidance: Holiday activities and food programme 2025 to 2026'** (updated February 2026)
(<https://www.gov.uk/government/publications/holiday-activities-and-food-programme/holiday-activities-and-food-programme-2025>)
14. **Department for Work & Pensions (2026) Crisis and Resilience Fund: Guidance for local authorities in England (1 April 2026 to 31 March 2029)**
(<https://www.gov.uk/government/publications/crisis-and-resilience-fund-guidance-for-local-authorities-in-england-1-april-2026-to-31-march-2029/the-crisis-and-resilience-fund-guidance-for-local-authorities-in-england-1-april-2026-to-31-march-2029#introduction>)

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COUNTY COUNCILS NETWORK

CCN is the voice of England's counties. Representing the local authorities in county areas, the network is a cross-party organisation which develops policy, commissions research, and presents evidence-based solutions to issues on behalf of the largest grouping of councils in England.

In total, the 21 county councils and 18 unitary councils that make up the CCN represent 26 million residents, account for 39% of England's GVA, and deliver high-quality services that matter the most to local communities.

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Changing the change

Basis helps public services make progress on messy problems through consulting, training and facilitation. As a founding member of the Public Services Transformation Academy, we pioneered the use of person-centred and agile approaches to change in local government.

All our work is aimed at making services better for citizens, faster to operate and cheaper to run. We have been listed as one of the Financial Times' top consultancies in the public and social sector for eight years running.

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Bremner & Co work to make the food system fairer. We focus on improving food policy and practice so that everyone has the right to good, nutritious, healthy food.

Much of our work centres on child health and nutrition across the life course. We are currently working on projects for breastfeeding, early years nutrition, the school food system and enhancing university food.

We work with national and local governments across the UK.