



The UK's COVID-19 Free School Meals Policy: was it evidence based?

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Background

The COVID-19 pandemic shone a light on health and social inequalities in the UK². The rising levels of food insecurity which occurred throughout the pandemic became a topic of public concern^{3,4}.

The Free School Meal (FSM) policy provides a free lunch in school to low-income children of all ages whose parents receive state benefits. As FSM eligible children represent some of the most disadvantaged in society, when schools were closed nationally in March 2020 a fast policy response was required to protect these children from increased food insecurity. Over the pandemic, a range of measures were used to replace FSM across countries of the UK. These included schools supplying food parcels and giving supermarket vouchers for families to purchase their own food. Additionally, in England the Holiday Activities and Food (HAF) programme which provides educational activities and food to FSM eligible children during school holidays was extended in response to the issue. However, the different schemes were implemented with varying degrees of success. For example, research identified that 50% of FSM eligible children did not access FSM at the start of the pandemic⁵, which is far below pre-pandemic access rates.

The Government and Civil Service aim for their policies to be evidence-based⁶, as it is thought to improve their quality and success⁷. However, the Government's general response to the COVID-19 pandemic has been criticised for its lack of transparent use of evidence⁸. Consequently, it is not clear whether evidence guided the FSM policy decisions during the COVID-19 pandemic.

It is important to evaluate the transparency of evidence-use by the Government in this period. Although it is unlikely that schools will need to close anytime soon, the decisions made in this period will affect the future of the FSM scheme. Through this evaluation, we

hope to learn from the decisions made and understand how to better influence the use of evidence in future policymaking, especially in times of uncertainty.

Methods

We used thematic content analysis to analyse policy documents and debates relating to FSM during the first year of the COVID-19 pandemic.

Search strategy

We searched for publicly available documents from the UK Government and the UK Parliament website (Hansard). In addition, the National Archives were searched for previous versions of documents which were updated multiple times within the study period. The time-period of 1st March 2020 to 31st March 2021 was used to capture the first year of the COVID-19 pandemic in the UK, including the first two national school closures, which corresponded with the first three waves of the COVID-19 pandemic. The following search terms were used “free school meals”, “‘free school meals’ AND COVID” and “Holiday Activities and Food”. The search produced 97 full-text documents and debates were reviewed for their relevance, of which 47 were excluded leaving a dataset of 50 papers. These are listed in the Appendix (Supplementary Table 1).

Analysis

We defined three policy phases to reflect different stages of the policy debate. These were guided by school closure dates only and not wider COVID-19 restrictions on businesses and social gatherings. These were:

- **Phase one:** the first national school closure (20th March 2020 – 15th July 2020). This corresponded with the first wave of COVID-19 infections in the UK.
- **Phase two:** school holidays. Including Easter 2020, Summer half-term 2020, Summer holidays 2020, October half-term 2020, Christmas 2020 and February half term 2021.
- **Phase three:** the second national school closure (5th January 2021 – 31st March 2021). This corresponded to the third wave of COVID-19 infections in the UK, linked to the Delta variant.

Then, we used theoretical frameworks on evidence-use in policymaking to develop five research objectives, presented in Figure 1. A detailed description of the frameworks can be found elsewhere⁹. We qualitatively reviewed the 50 policy documents and debates to answer these five research objectives and determine the transparency of evidence use at each policy phase. Types of evidence considered included peer-reviewed literature but also grey

literature such as government documents, external reviews, external interest groups, case studies and reports from scrutiny bodies such as the National Audit Office (NAO)¹⁰. For the fifth research objective, numerous influencing factors were identified in the data. It was beyond the scope of the project to present them all, therefore we focused on three themes: ‘delivery’, ‘politics’ and ‘policy actors and public opinion’, which were the most prominent in the documents.

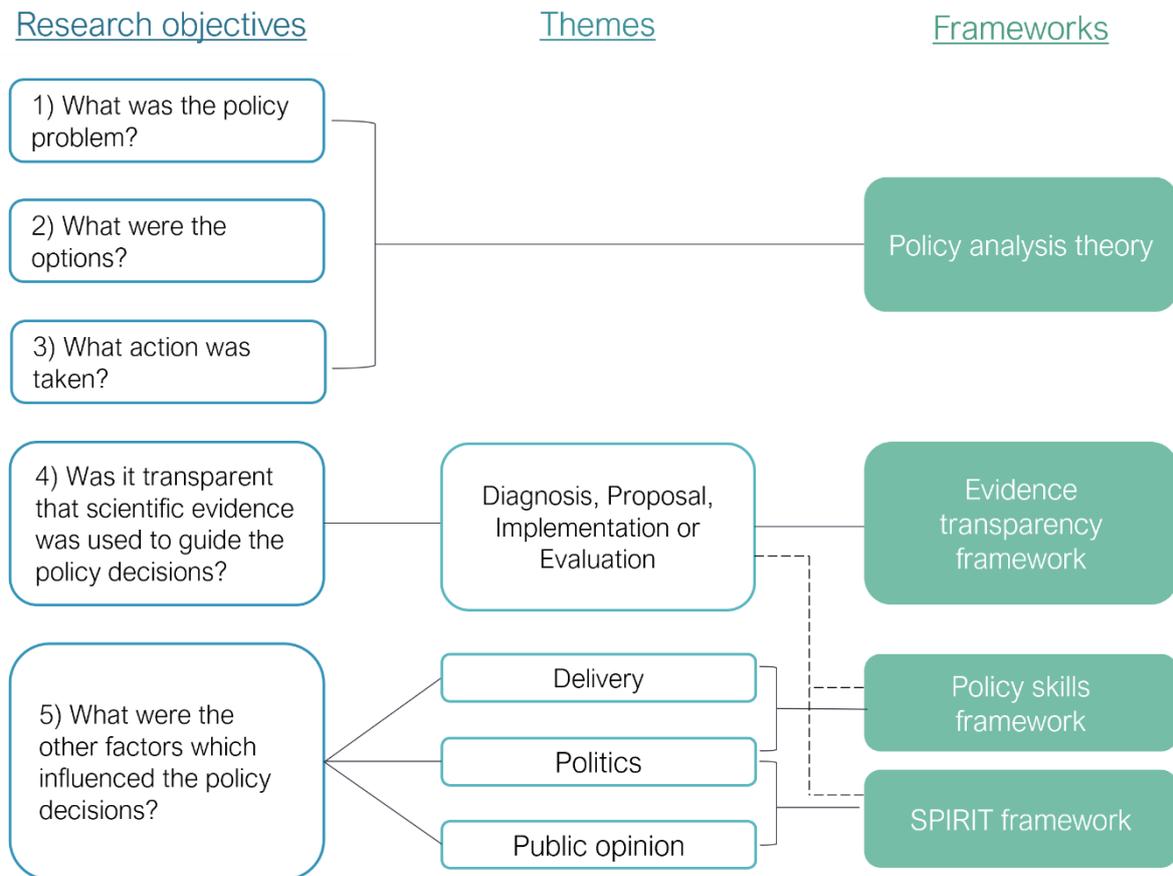


Figure 1 - Diagram of the relationship between the study’s research objectives, themes, and theoretical frameworks. Note: dotted line describes where frameworks were associated with but did not directly inform the research objective.

Results

In total 50 documents and debates were analysed in this study (Table 1). The greatest proportion were debates from the House of Commons (n=17, 34%) followed by guidance documents (n=15, 30%).

Table 1 - Summary of the type of documents analysed in the thematic content analysis (n=50)

Document type	N	%
House of Commons Debate	17	34
Guidance	15	30
House of Lords Debate	7	14
Department for Education Blog	6	12
Press release	2	4
Private Notice Question (Lords)	1	2
Impact Assessment	1	2
Policy Paper	1	2

Research objective 1: What was the policy problem?

On 20th March 2020 schools closed nationally. However, there was no system to continue FSM provision for children at home. Local Authorities and state-funded schools have a legal responsibility to provide FSM in term-time to eligible low-income children¹¹, so it was necessary the Government found a solution. Policymakers needed to decide which *mode* of FSM provision was the best.

However, there was no legal requirement to continue FSM provision during holidays.

Therefore, the policy problem for FSM delivery during school holidays was centred around whether FSM provision should be given at all.

“Under normal circumstances, schools are not expected to provide free school meals to disadvantaged children who are not attending due to illness or if the school is closed.”

Department for Education. *“COVID-19: free school meals guidance for schools”*. 19th March 2020

Research objective 2: What were the policy options?

A summary of policy options that were available to and considered by the Government are presented below.

- **Do nothing:** Provide no replacement (holidays only)
- **Give meals/food parcels:** Provided through the School’s caterer
- **Supermarket vouchers:** Give money in the form of vouchers, arranged by locally by schools or nationally by the Government.
- **Cash transfers:** Give money direct to families
- **Increased benefits:** Give money via the benefit system

Research objective 3: What action was taken?

The policy action over the study period is summarised in Figure 2.

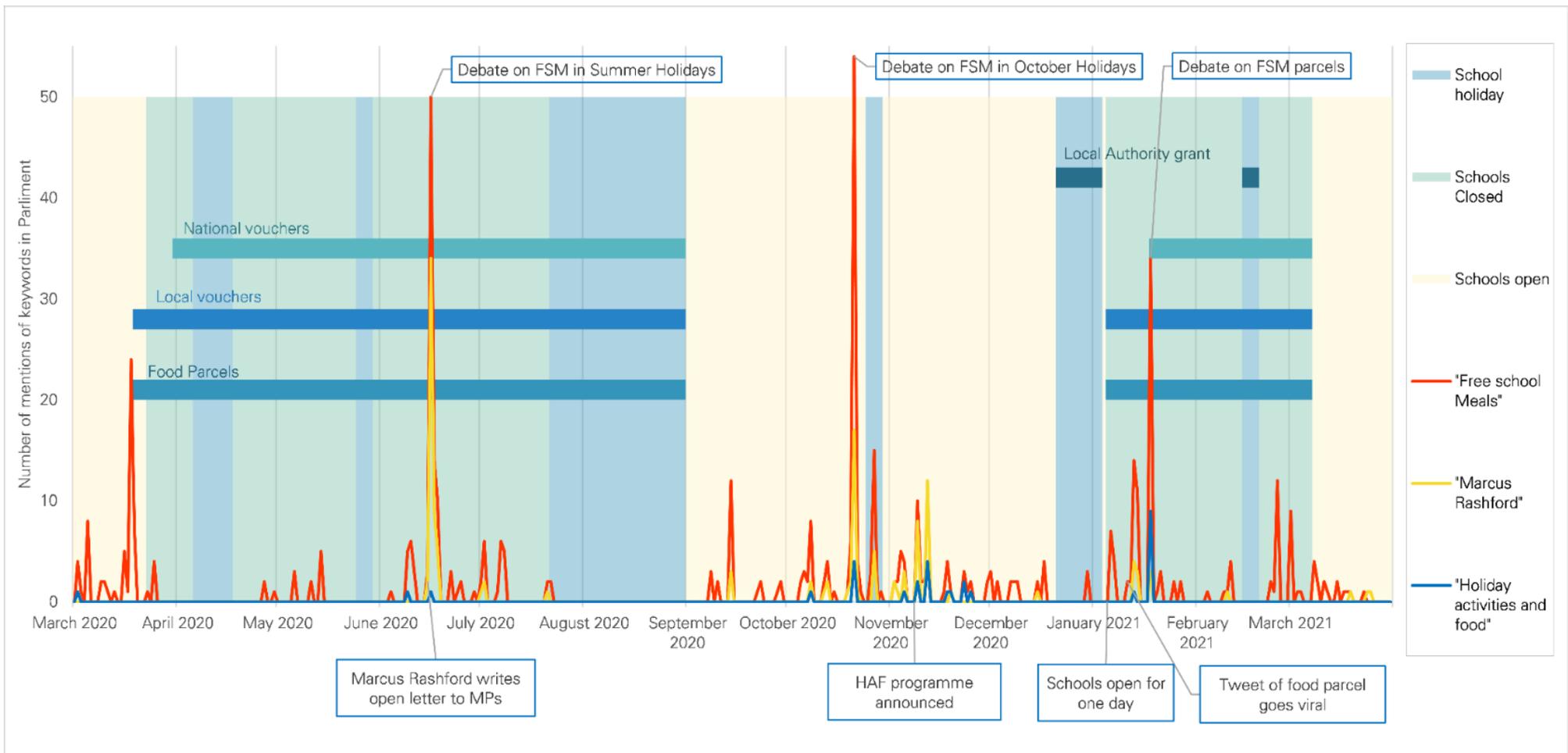


Figure 2 - Timeline of key Free School Meal (FSM) policy events and the frequency of keywords referenced in the UK Parliament (1st March 2020 – 31st March 2021). Note: FSM – Free School Meals; HAF – Holiday Activities and Food programme; Local Authority Grant – COVID winter grant supplied to Local Authorities; Local Vouchers - vouchers arranged by schools directly; Food Parcels – Any food supplied by the schools catering team (inclusive of meals delivered)

Phase one – First national school closure

Between March 2020 - July 2020 FSM were replaced using food parcels or supermarket vouchers. The Government guidance displayed a preference for schools to deliver food parcels or meals through existing caterers, although schools were allowed to opt for vouchers.

Phase two - School holidays

Policy action regarding FSM in school holidays varied drastically during the study period, ranging from full continuation of FSM using local or national voucher schemes and food parcels (March 2020 - July 2020, January 2021 - March 2021) to no FSM replacement (October 2020). Continuation of FSM in school holidays was closely linked to the national closure of schools. The decision was debated in Parliament on two occasions; in June 2020 parliament voted to continue FSM but in October 2020 parliament voted against this action. In November 2020, extension of the HAF programme was announced.

Phase three – Second national school closure

Schools returned from Christmas break for one day before national school closures were announced for 5th January 2020. Initially, the Government “strongly encourage[d]” schools to provide FSM through food parcels. However, this advice was later moderated to “schools may consider” food parcels. The national voucher scheme was reinstated on 18th January 2021.

Research objective 4: Was it transparent that scientific evidence was used to guide the policy decisions?

Analysis of the policy documents revealed little transparent evidence use. Only one document¹² cited the scientific evidence used, this was only to support need for the policy. All other documents indicated evidence use but did not include a citation.

Analysis of parliamentary debates also did not indicate transparent evidence use. Evidence was used most consistently to describe the level of need for FSM in the population. Politicians used evidence to argue both for and against the need for FSM.

“Research from the Food Foundation shows that more than 200,000 children have had to skip meals because their family could not access the food they need during lockdown. “

Rebecca Long Bailey MP (Lab). House of Commons. 16th June 2020

There was a notable lack of evidence used to justify the mode of FSM provision chosen by the Government. For example, one of the Government's reasons not to opt for cash transfers was that they may be misspent by beneficiaries. However, this argument was not evidence-based. In fact, evidence was used by opposition politicians to refute this argument.

“Extensive research by the World Bank in all world economies, not just the poorest, proves that cash transfers work and that concerns around their use on ‘temptation goods’ are ‘unfounded’ “

Sharon Hodgson MP (Lab). House of Commons 18th January 2021

There was stronger evidence-use when it came to justifying the extension of the HAF programme in school holidays. Politicians indicated that policy recommendations made in the National Food Strategy¹³ (a government commissioned independent report) were closely followed.

“So much of what the Government have committed came directly from the national food strategy, which was commissioned in June 2019.”

Tom Hunt MP (Con). House of Commons 18th January 2021

Lastly, evidence of the policies' effectiveness in phase one (March 2020- July 2020) was used in Parliament to highlight flaws in the Government's approach. This may have factored into the Government's initial decision not to continue the National Voucher scheme in January 2021.

Research objective 5: What other factors influenced these decisions?

Delivery

The FSM policy response was initially guided by feasibility and delivery of implementation. Quickly establishing a system which would function for as many schools as possible was prioritised. The need to produce the policy quickly was used to explain why the usual policy process was not followed and excuse any poor performance.

“Some of the arguments today pale into insignificance when compared with the enormity of the economic challenge we face. It is therefore correct to look at quick measures such as this, when normally we would take a strategic view, go through a Select Committee, get evidence and so on.”

Catherine West MP (Lab). House of Commons. 21st October 2020

Additionally, The Government’s advice that schools should try to deliver food parcels first may have partly been driven by concerns over reducing costs. This was most apparent in phase two; schools had returned to school for one day before the national closures, resulting in a large waste of food and money.

“One key reason why the Government gave schools the choice was that they were aware of the operation of their own school catering staff—but also, certain suppliers had already purchased food and they had already paid for it so, obviously, moving to a voucher system immediately could have resulted in food waste.”

The Parliamentary Under-Secretary of State, Department for Education and Department for International Trade (Baroness Berridge [Con]). House of Lords. 14th January 2021.

Politics

Politicians’ views on the welfare state appeared to be strongly associated with the Government’s FSM policy decisions and their opinion on the purpose of FSM. Preference towards giving food parcels was often justified by the ideological view that if money were given it would be misspent. Opposition politicians disagreed with this stance.

Small state ideology was also central in the Government’s view that FSM should not be continued outside of term-time, arguing that it would increase welfare spending. Politicians disagreed over the purpose of FSM and the topic grew increasingly emotional and divisive over the study period.

“I am unashamedly committed to the Conservative ideas of a small state [...] some parents just do not or cannot prioritise their children’s needs over their own. We must [... not allow] the Government to step in and do the easiest thing—throw money at the problem.”

Sally-Ann Hart MP (Con). House of Commons. 16th June 2020

External policy actors and public opinion

It is important to recognise the influence of external actors, public attention and social media in the policy decisions that were made and on developing divisive debate. Marcus Rashford ran an influential and ultimately successful Twitter campaign for the Government to “#maketheUturn” on their decision not to continue FSM in the Summer 2020 holidays. However, Rashford’s intervention was viewed less favourably by some Conservative MPs, further polarising political views on FSM.

“This is an issue that has gained significant traction over the past few days, with a chorus of charities, legal campaigners, Sustain and Good Law Project, Members across the House, good people tweeting all over the country and, of course, Manchester United star, Marcus Rashford.”

Rebecca Long-Bailey MP (Lab). House of Commons. 16th June 2020

Discussion

This analysis of the UK’s COVID-19 FSM policy decisions found that overall transparency of evidence use was low. In absence of evidence, ideological views, policy delivery and responding to increased public attention were other rationale present in the decision making.

The unprecedented nature of the pandemic necessitated policy changes on a shorter timescale to normal. Yet, it is precisely because these decisions were made outside of the standard policy process that additional scrutiny should be applied, not less¹⁴. The transparency of evidence use over this period was low. The policies that were introduced were long-term and costly and the decisions made during this period will extend beyond the reach of the pandemic.

While overall the evidence-use was not transparent, the Government provided the most evidence to support the introduction of the HAF policy. Importantly, there was a good amount of evidence on this policy available to politicians. The Government commissioned a literature review on HAF in 2018¹⁵ and the National Food Strategy released recommendations to extend the programme in July 2020¹³. The National Food Strategy report was well-researched, made evidence accessible and was well-regarded by a range of policy actors including academics, non-governmental organisations, and the public. This highlights the importance of evidence being well-synthesised and highly accessible to MPs for the development of evidence-based policy. Indeed, MPs report that this is an important

factor which determines their use of evidence^{6,16-18}. While this study has one country and policy context, this conclusion has relevance to policymaking in future periods of uncertainty worldwide.

Our research indicated in the absence of evidence, individual political ideological perspectives strongly influenced policymakers' view on modes of FSM, which were closely aligned with wider debates on the welfare state. Policymakers make decisions with '*bounded rationality*'; in fast-paced or uncertain policy environments irrational or emotional shortcuts are used to make decisions quickly¹⁹. Social media acted to polarise these value-based views, further entrenching and validating their opinion²⁰. The political debate was divisive and steeped in emotional language, it is therefore unsurprising that this political environment did not produce a strategic, organised, or efficient approach to FSM during COVID-19.

Conclusions and policy implications

This paper has important implications for understanding future discussions on food assistance policy. The political tensions generated in this period will go on to inform future policy discussions, which will likely continue to be highly divisive.

Most importantly however, this research highlights the need for a formal review into FSM. The policy options deployed over the pandemic were wide-ranging and could provide an opportunity for evaluating the most effective approach to food-assistance, addressing a current evidence-gap. A credible and well-summarised review of the FSM policy in this period could ensure lessons are learnt and increase the likelihood that future food assistance policy is evidence-based. Understanding the most effective approach to food assistance is critical to gathering future political support and ensuring value for money.

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Appendix

Supplementary Table 1 – List of documents analysed in the thematic content analysis

#	Date	Document	Title	Link
1	18/03/2020	House of Commons Debate	Educational Settings	https://hansard.parliament.uk/commons/2020-03-18/debates/FCD4DEB2-86A8-4F95-8EB8-D0EF4C752D7D/EducationalSettings [Accessed 15 th October 2021]
2	19/03/2020	Guidance	COVID-19: free school meals guidance for schools	https://webarchive.nationalarchives.gov.uk/ukgwa/*/https://www.gov.uk/government/publications/covid-19-free-school-meals-guidance/covid-19-free-school-meals-guidance-for-schools [Accessed 7 th October 2020]
3	19/03/2020	Press release	Plan set out to support pupils eligible for free school meals	https://www.gov.uk/government/news/plans-set-out-to-support-pupils-eligible-for-free-school-meals [Accessed 15 th October 2021]
4	23/03/2020	Impact Assessment	Coronavirus bill: summary of impacts	https://www.gov.uk/government/publications/coronavirus-bill-summary-of-impacts [Accessed 15 th October 2021]
5	31/03/2020	Guidance	COVID-19: free school meals guidance for schools	National archive link given above [Document #2]
6	31/03/2020	Press release	Voucher scheme launches for schools providing free school meals	https://www.gov.uk/government/news/voucher-scheme-launches-for-schools-providing-free-school-meals [Accessed 15 th October 2021]
7	07/04/2020	Guidance	COVID-19: free school meals guidance for schools	National archive link given above [Document #2]
8	27/04/2020	Guidance	COVID-19: free school meals guidance for schools	National archive link given above [Document #2]
9	06/05/2020	House of Lords Debate	Income Equality and Sustainability	https://hansard.parliament.uk/Lords/2020-05-06/debates/FA9D8C72-B304-4E02-8369-9840AA636EBB/IncomeEqualityAndSustainability?highlight=income%20equality%20sustainability#contribution-6C2DA7CB-

				8FBE-4C22-8675-3F90BD24684A [Accessed 15 th October 2021]
10	11/05/2020	House of Commons Debate	Covid-19	https://hansard.parliament.uk/Commons/2020-05-11/debates/9DD7E97E-5478-40D5-94F9-758D21D302DF/Covid-19 [Accessed 15 th October 2021]
11	14/05/2020	House of Lords Debate	Food Supply and Security	https://hansard.parliament.uk/Lords/2020-05-14/debates/2580EB0C-D204-4BA4-9753-2523AB761DB1/FoodSupplyAndSecurity [Accessed 15 th October 2021]
12	15/05/2020	Guidance	COVID-19: free school meals guidance for schools	National archive link given above [Document #2]
13	28/05/2020	Guidance	COVID-19: free school meals guidance for schools	National archive link given above [Document #2]
14	10/06/2020	House of Lords Debate	Free School Meal Vouchers Scheme	https://hansard.parliament.uk/Lords/2020-06-10/debates/086880FF-C22B-4025-82F3-2FDA12FFB51D/FreeSchoolMealVouchersScheme [Accessed 15 th October 2021]
15	16/06/2020	House of Commons Debate	Free School Meals: Summer Holidays	https://hansard.parliament.uk/Commons/2020-06-16/debates/198986A3-041A-4FAF-ABA3-B80FE907E0E4/FreeSchoolMealsSummerHolidays [Accessed 15 th October 2021]
16	17/06/2020	House of Commons Debate	Engagements	https://hansard.parliament.uk/Commons/2020-06-17/debates/D91FE96D-8668-4B3C-AC27-A9CE9E961015/Engagements [Accessed 15 th October 2021]
17	17/06/2020	Private Notice Question (Lords)	Covid-19 Summer Food Fund	https://hansard.parliament.uk/Lords/2020-06-17/debates/3512BEA8-AB9B-4B3C-8A3E-74516D5C37FE/Covid-19SummerFoodFund [Accessed 15 th October 2021]
18	30/06/2020	Guidance	COVID-19: free school meals guidance for schools	National archive link given above [Document #2]
19	02/07/2020	House of Commons Debate	Finance Bill	https://hansard.parliament.uk/Commons/2020-07-02/debates/C1F59852-6C39-4BAB-94E0-5D6688121BC5/FinanceBill [Accessed 15 th October 2021]

20	22/07/2020	Press release	Thousands of children to benefit from free meals and activities	https://www.gov.uk/government/news/thousands-of-children-to-benefit-from-free-meals-and-activities [Accessed 15 th October 2021]
21	28/08/2020	Guidance	COVID-19: free school meals guidance for schools	National archive link given above [Document #2]
22	14/09/2020	House of Lords Debate	Schools: Free Holiday Meals and Activities	https://hansard.parliament.uk/Lords/2020-09-14/debates/532851E9-6C01-451F-8AD2-CBE0E0AFB83F/SchoolsFreeHolidayMealsAndActivities [Accessed 15 th October 2021]
23	08/10/2020	House of Commons Debate	Business of the House	https://hansard.parliament.uk/Commons/2020-10-08/debates/0F55F270-487C-4D1A-BE7E-63A3EABDEA97/BusinessOfTheHouse [Accessed 15 th October 2021]
24	15/10/2020	House of Commons Debate	Topical Questions	https://hansard.parliament.uk/Commons/2020-10-15/debates/81BD0481-0124-42D5-A25D-4ECD18CDBD51/TopicalQuestions [Accessed 15 th October 2021]
25	19/10/2020	Department for Education Blog	Questions and answers on free school meals	https://educationhub.blog.gov.uk/2020/10/19/questions-and-answers-on-free-school-meals/ [Accessed 15 th October 2021]
26	21/10/2020	House of Commons Debate	Free School Meals	https://hansard.parliament.uk/Commons/2020-10-21/debates/79C0CA8D-CADF-4562-9317-5A51810BB5DE/FreeSchoolMeals [Accessed 15 th October 2021]
27	21/10/2020	House of Commons Debate	Right to Food in Legislation	https://hansard.parliament.uk/Commons/2020-10-21/debates/7527D307-E122-48EF-9A00-F72295BD7AA1/RightToFoodInLegislation [Accessed 15 th October 2021]
28	27/10/2020	House of Lords Debate	Free School Meals	https://hansard.parliament.uk/Lords/2020-10-27/debates/9D32B95A-0337-419C-AA79-6988618063A8/FreeSchoolMeals [Accessed 15 th October 2021]
29	05/11/2020	House of Commons Debate	Food Supply: Covid-19	https://hansard.parliament.uk/Commons/2020-11-05/debates/C663CBD4-3E55-4C69-9F1C-

				4D5FE4599ABD/FoodSupplyCovid-19 [Accessed 15 th October 2021]
30	08/11/2020	Press release	New winter package to provide further support for children and families	https://www.gov.uk/government/news/new-winter-package-to-provide-further-support-for-children-and-families [Accessed 15 th October 2021]
31	09/11/2020	House of Commons Debate	Supporting Disadvantaged Families	https://hansard.parliament.uk/Commons/2020-11-09/debates/640B734D-982A-46E7-8B6C-8576D161FCC1/SupportingDisadvantagedFamilies [Accessed 15 th October 2021]
32	12/11/2020	House of Lords Debate	Supporting Disadvantaged Families	https://hansard.parliament.uk/Lords/2020-11-12/debates/28413F45-B568-47A5-A5CB-0B7725AC39F4/SupportingDisadvantagedFamilies [Accessed 15 th October 2021]
33	16/11/2020	Guidance	COVID-19: free school meals guidance for schools	National archive link given above [Document #2]
34	16/12/2020	Guidance	Holiday activities and food programme 2021	https://webarchive.nationalarchives.gov.uk/ukgwa*/https://www.gov.uk/government/publications/holiday-activities-and-food-programme [Accessed 2 nd December 2020]
35	18/12/2021	Press release	Families in need are getting extra government support in time for Christmas	https://www.gov.uk/government/news/families-in-need-are-getting-extra-government-support-in-time-for-christmas [Accessed 15 th October 2021]
36	06/01/2021	House of Commons Debate	Covid-19: Educational Settings	https://hansard.parliament.uk/Commons/2021-01-06/debates/D2A64DD9-6A6B-4EAB-8001-C3BACDE25B02/Covid-19EducationalSettings [Accessed 15 th October 2021]
37	08/01/2021	Guidance	COVID-19: free school meals guidance for schools	National archive link given above [Document #2]
38	13/01/2021	Guidance	COVID-19: free school meals guidance for schools	National archive link given above [Document #2]
39	13/01/2021	House of Commons Debate	Engagements	https://hansard.parliament.uk/Commons/2021-01-13/debates/FF0968C6-A5BB-4070-9054-D97745B51902/Engagements [Accessed 15 th October 2021]

40	13/01/2021	House of Commons Debate	School Closures: Support for Pupils	https://hansard.parliament.uk/Commons/2021-01-13/debates/EDA06425-FC24-46E9-917D-954A142825A7/SchoolClosuresSupportForPupils [Accessed 15 th October 2021]
41	14/01/2021	House of Lords Debate	Free School Meals: Food Parcels	https://hansard.parliament.uk/Lords/2021-01-14/debates/C93F96A7-C306-41C1-B002-7784A73F1E9A/FreeSchoolMealsFoodParcels [Accessed 15 th October 2021]
42	15/01/2021	Department for Education Blog	Guidance on Free School Meals expectations while remote learning	https://educationhub.blog.gov.uk/2021/01/15/guidance-on-free-school-meals-expectations-while-remote-learning/ [Accessed 15 th October 2021]
43	18/01/2021	House of Commons Debate	Remote Education and Free School Meals	https://hansard.parliament.uk/Commons/2021-01-18/debates/861EC233-72B9-423D-B2F5-0D8E73EDA0D7/RemoteEducationAndFreeSchoolMeals [Accessed 15 th October 2021]
44	18/01/2021	House of Commons Debate	Topical Questions	https://hansard.parliament.uk/Commons/2021-01-18/debates/2954DE2B-BE9B-436D-AEA9-2A2F8DAB5CA7/TopicalQuestions [Accessed 15 th October 2021]
45	18/01/2021	House of Commons Debate	Universal Credit and Working Tax Credit	https://hansard.parliament.uk/Commons/2021-01-18/debates/5D4FD221-2AEE-43AE-874C-7509E7AEF8D1/UniversalCreditAndWorkingTaxCredit
46	18/01/2021	Press release	National free school meals voucher scheme opens	https://www.gov.uk/government/news/national-free-school-meals-voucher-scheme-opens-to-orders [Accessed 15 th October 2021]
47	04/02/2021	Guidance	COVID-19: free school meals guidance for schools	National archive link given above [Document #2]
48	10/03/2021	Guidance	COVID-19: free school meals guidance for schools	National archive link given above [Document #2]
49	17/03/2021	Guidance	Holiday activities and food programme 2021	National archive link given above [Document #34]

50	27/03/2021	Policy Paper	COVID-19 mental health and wellbeing recovery action plan	https://www.gov.uk/government/publications/covid-19-mental-health-and-wellbeing-recovery-action-plan [Accessed 15 th October 2021]
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