

The purpose of an Integrated Impact Assessment is to evidence that Aberdeen City Council is meeting its legislative duties by assessing the potential impacts of its policies and decisions on different groups of people and the environment. The legislation considered within this assessment is:

- Section 2 [Equality Act 2010 protected characteristics](#)
- Section 3 [Socio-Economic](#)
- Section 4 [Consumer Duty](#)
- Section 5 [Human Rights](#)
- Section 6 [Children and Young People’s Rights](#)
- Section 7 [Environmental impacts](#)

The term ‘policy’ is used throughout this document and applies to policies, proposals, strategies, provision, criteria, functions, practice, budget savings and activities that includes delivery of our services.

1. About the Policy

1.1 Title
Review options for providing school meals
1.2 What does this policy seek to achieve?
Efficiencies to the value of £150k from the provision of school meals in our Early Learning, Primary School and Secondary School settings. Efficiencies will be achieved by: <ol style="list-style-type: none"> 1) Applying a price increase (20p per meal) for both Primary and Secondary school paid meals. 2) Implementing the principle that (initially) all S1 pupils should remain in school for lunch (expanding to S1 and S2 in 2026/27 and S1, S2 and S3 in 2027/28), driving increase in income. 3) Considering alternative delivery models.
1.3 Is this a strategic programme/proposal/decision?
The proposal should be considered strategic and it will be considered at Full Council as part of the budget setting process for 2025/26.
1.4 Is this a new or existing policy?
New
1.5 Is this report going to a committee?
Yes
1.6 Committee name and date:
Council, 05 March 2025
1.7 Report no and / or Budget proposal number and / or Business Case reference number:
OSM-02
1.8 Function and Cluster:
Corporate Landlord/Families & Communities

Impacts

Aberdeen City Council has a legal requirement as a public sector organisation to assess the impact of its work on equality groups and assess against human rights, children’s rights and our socio-economic duty. This is our Public Sector Equality Duty (PSED). The PSED has three key parts:

- Eliminate unlawful discrimination, harassment, victimisation or any other prohibited conduct.
- Advance equality of opportunity.
- Foster good relations by tackling prejudice, promoting understanding.

This following five sections in the Integrated Impact Assessment demonstrate that these considerations that have been made in the policy, that the impact of proposals made is understood and accepted, and what mitigating steps can be taken to reduce any negative impact of the policy.

2: Equality Act 2010 - Protected Characteristics

Aberdeen City Council wants to ensure everyone is treated fairly. This section identifies what impact the policy may have on people with [protected characteristics](#).

2.1 What impact could this policy have on any of the below groups?

Protected Characteristic	Negative			Neutral	Positive
	High	Medium	Low		
Age		X			
Disability		X		X	
Gender Reassignment				X	
Marriage and Civil Partnership				X	
Pregnancy and Maternity				X	
Race				X	
Religion or Belief				X	
Sex		X			
Sexual Orientation				X	

2.2 In what way will the policy impact people with these protected characteristics?

Any changes to school meal provision will impact upon pre-school and school aged children and young people. Ages range from 2 up to 18 years of age (ELC through S6). Free school meals are currently provided to all pupils in primaries 1 to 5 and all pupils in special schools. Pupils above primary 5 are eligible for free school meals in the forthcoming financial year, if their parents or guardians are in receipt of any of the following benefits:

- Income Support
- Income-based Job Seeker’s Allowance
- Any income related element of Employment and Support Allowance
- Child Tax Credit, but not Working Tax Credit, with an income of less than £18,725
- Both Child Tax Credit and Working Tax Credit with an income of up to £8,717
- Support under Part VI of the Immigration and Asylum Act 1999
- Universal Credit with a monthly earned income of not more than £726

Negative impacts may be experienced by pupils with additional support needs, whose parents or carers do not currently meet free school meals eligibility criteria.

Negative impacts may also be experienced by mothers, who are generally young person’s primary care givers. If price increases are unaffordable, more pupils may be given packed lunches to take to school rather than attend for school meals.

Consideration of alternative delivery models, if it led to implementation, may negatively impact on the employment of our Catering Service workforce, which is predominantly female.

2.3 What considerations have been made in reaching the above assessment?

What internal or external data has been considered? What does this data tell us?

The ages of pre-school and school aged children and young people is widely known.

There are currently 26162 pupils attending Aberdeen City Schools. 13,636 pupils are entitled to free school meals through either universal or means tested eligibility, leaving 12,526 pupils who would currently pay for their school meals.

Catering service staffing reports show that there are currently 359 employment contracts in Catering Services. 359 (98.9%) of those are held by female team members and 4 (1.1%) by male team members. Employee ages range from twenties to seventies.

What consultation and engagement has been undertaken with officers and partner organisations?

Chief Officers from all other services have had sight of all budget options being put forward.

What consultation and engagement has been undertaken with people who may be impacted by this policy?

Aberdeen City Council undertook a two-part public consultation around the 2025/26 Budget and future spending plans from August 2024 to November 2024.

In Part 1, conducted throughout August 2024, participants were asked to provide feedback on four key areas: Budget Options, Council Tax, Service Area Prioritisation, and Capital Programme Expenditure. Under Budget Options, respondents were queried about the potential impacts of proposed options, including both reduction strategies and income-boosting charges. Regarding Council Tax, input was sought on acceptable levels of increase and their potential impacts. Citizens were also invited to express their views on which service areas should be prioritised for spending and to offer their opinions on capital programme expenditure.

In part 2, which took place throughout November 2024, the Council consulted on additional budget options, again focusing on the impact if implemented. The phase 2 consultation included budget options relating to the Aberdeen Health and Social Care Partnership.

There were 4278 responses across the four areas consulted on during part 1 of the online consultation and 1535 responses to part 2. Respondents had the option to indicate which protected characteristics would be affected.

46% of respondents felt a review of school meal provision would have a negative impact: 19% high, 14% medium, and 13% low. Meanwhile, 54% reported no impact.

Various approaches were offered to support participation. Throughout both phases, opportunities were offered for the public to attend face to face and digital sessions to discuss the proposals in more detail. There were 2 face to face sessions, including British Sign Language options and 4 digital sessions, with a total of 24 attendees.

The option which this IIA relates to was included in the phase 1 consultation. In summary, opinion from those who responded to the consultation was as follows:

Importance of Free School Meals: Many respondents emphasise the importance of free school meals for children, particularly for those from low-income families who may rely on these meals as their only substantial food for the day.

Concerns about Removing Free Meals: Several people express concerns that removing free school meals or increasing their cost could exacerbate inequality and negatively impact children's health and academic performance.

Support for Means Testing: Some respondents suggest that free school meals should be means-tested to ensure that those who genuinely need them receive them, thus reducing unnecessary expenditure.

Pre-ordering Meals: There is support for pre-ordering meals to reduce waste and improve efficiency, though some parents and children may find it inconvenient.

Impact on Local Businesses: Allowing students to leave school for lunch could affect local businesses that rely on student customers, but it might also lead to unhealthy eating habits.

Administrative Savings: Some respondents believe that administrative changes could save money without compromising the quality or availability of school meals.

Quality of School Meals: There are mixed opinions on the quality of current school meals, with some calling for improvements to ensure they are nutritious and appealing to children.

Potential Risks of Leaving School: Concerns are raised about the risks associated with allowing children to leave school during lunch, including safety issues and unhealthy food choices.

Financial Strain on Families: Increasing the cost of school meals could place additional financial strain on families, particularly during the current cost-of-living crisis.

Inclusivity and Equality: Ensuring that all children have access to nutritious meals at school is seen as a way to promote inclusivity and reduce bullying related to socioeconomic differences.

2.4 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (if applicable)?

The service will continue to encourage all customers of the service, whether they are entitled to a free school meal or not, to take their lunch in school on a daily basis.

If the proposal was to be taken forward and an alternative delivery model implemented which required a reduction in employee numbers, a business case would be required which would be subject to full consultation with the employee group and Trade Union representatives. The intention would be for 'natural wastage' to be used to allow employees to naturally leave the organisation, and a review of currently vacant posts would also be undertaken. All employees are on city-wide contracts, so could be realigned to provide service at other schools.

With mitigations in place, what is the new overall rating of the negative impact(s)?

High	
Medium	
Low	X
Negative Impact Removed	

3: Socio-Economic Impacts

Aberdeen City Council has a duty to reduce the inequalities of outcome that can arise from socio-economic disadvantage. This section is used to consider what impact the policy may have on people experiencing socio-economic disadvantage – and how any inequalities of outcome arising from the policy can be reduced.

Use this guide to understand more on socio-economic inequalities: [The Fairer Scotland Duty: Guidance for Public Bodies \(www.gov.scot\)](https://www.gov.scot/publications/fairer-scotland-duty/guidance-for-public-bodies/)

3.1 What impact could this policy have on people who experience the following aspects of socio-economic disadvantage?

	Negative	Neutral	Positive
Low income – those who have insufficient earnings to meet basic needs, such as food, clothing, housing, or utilities.	X		
Low/ no wealth – those who have no savings for unexpected spend or provision for the future.	X		
Material deprivation – those who cannot afford or access goods or services that are considered essential or desirable for a decent quality of life, such as food, clothing, heating, transport, internet, cultural, recreational and social activities.	X		
Area deprivation – those who live in an area with poor living conditions, such as higher levels of crime, pollution, noise, congestion, or lack of infrastructure, amenities, or green spaces.	X		
Socio-economic background – social class, parents’ education, employment, income.	X		

3.2 In what way will the policy impact people experiencing socio-economic disadvantage?

Increasing the price of a school meal will not impact upon those who qualify for free school meals either through universal provision or through entitlement due to low income. It will impact on those who do not qualify for free school meals and would have the greatest impact on those who fall just outside of the low income free school meals eligibility criteria.

3.3 What considerations have been made in reaching the above assessment?

What internal or external data has been considered? What does this data tell us?
School meal debt recovery processes are followed throughout the course of the year with many parents and carers being subject to these processes. Although the Catering Service aren’t aware of parents and carers individual financial circumstances, it is safe to assume that many are struggling financially due to the ongoing cost of living crisis and that any increase in school meal prices may be hard for those on moderately low incomes to afford.
What consultation and engagement has been undertaken with officers and partner organisations?
Chief Officers from all other services have had sight of all budget options being put forward.
What consultation and engagement has been undertaken with people who may be impacted by this policy?
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strategies and income-boosting charges. Regarding Council Tax, input was sought on acceptable levels of increase and their potential impacts. Citizens were also invited to express their views on which service areas should be prioritised for spending and to offer their opinions on capital programme expenditure.

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Concerns about Removing Free Meals: Several people express concerns that removing free school meals or increasing their cost could exacerbate inequality and negatively impact children's health and academic performance.

Support for Means Testing: Some respondents suggest that free school meals should be means-tested to ensure that those who genuinely need them receive them, thus reducing unnecessary expenditure.

Pre-ordering Meals: There is support for pre-ordering meals to reduce waste and improve efficiency, though some parents and children may find it inconvenient.

Impact on Local Businesses: Allowing students to leave school for lunch could affect local businesses that rely on student customers, but it might also lead to unhealthy eating habits.

Administrative Savings: Some respondents believe that administrative changes could save money without compromising the quality or availability of school meals.

Quality of School Meals: There are mixed opinions on the quality of current school meals, with some calling for improvements to ensure they are nutritious and appealing to children.

Potential Risks of Leaving School: Concerns are raised about the risks associated with allowing children to leave school during lunch, including safety issues and unhealthy food choices.

Financial Strain on Families: Increasing the cost of school meals could place additional financial strain on families, particularly during the current cost-of-living crisis.

Inclusivity and Equality: Ensuring that all children have access to nutritious meals at school is seen as a way to promote inclusivity and reduce bullying related to socioeconomic differences.

Aberdeen Youth Movement held a 'Lunchtime' takeover event at five secondary schools during the week of November 4th to gather feedback on phase 2 of the budget consultation. They engaged with over 390 young people aged 12-25 years across the city and promoted the consultation through social media channels.

Comments included:

- People need their school meals and if you don't have money, you need it daily.
- Make the food/drinks cheaper
- Don't cut school meals as some kids aren't able to be fed at home.
- I disagree with cutting free school meals because some people can't afford them.

3.4 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (if applicable)?

The service will continue to encourage all customers of the service, whether they are entitled to a free school meal or not, to take their lunch in school on a daily basis.

Consultation would be undertaken with the employee group and Trade Union representatives. All employees affected by a reduction in service option could find themselves in a redeployment situation and would be supported in accordance with that process to find suitable alternative employment. It would be hoped that through natural wastage, vacancy management and realigning employees to provide service at other properties, no remaining employees will suffer financial detriment.

If mitigations are in place, does this remove or reduce the negative impact?

No – negative impact remains

X

Yes – negative impact reduced

Yes - negative impact removed

4: Consumer Impacts

The Consumer Scotland Act 2020 places a Consumer Duty on the public sector to put consumer interests at the heart of strategic decision-making, emphasising the need for accessible and affordable public services, especially during times of financial pressure. This person-centred approach is intended to result in better quality services and outcomes for the public as consumers of public services across Scotland.

This section of the IIA is used to consider the impact of the policy on consumers of any services that the policy is intended to change.

Use this guide to understand more on the consumer duty: [How to meet the consumer duty: guidance for public authorities](#)

4.1 What impact could this policy have on any of the below consumer groups?

	Negative	Neutral	Positive
Individuals	X		
Small businesses		X	

4.2 In what way will the policy impact people in these consumer groups?

The proposal will impact upon the parents or carers of young people, who do not qualify for free school meal provision, as they will have to pay a higher price for school meals.

4.3 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (if applicable)?		
The service will continue to encourage all customers of the service, whether they are entitled to a free school meal or not, to take their lunch in school on a daily basis.		
If mitigations are in place, does this remove or reduce the negative impact?	No – negative impact remains	X
	Yes – negative impact reduced	
	Yes - negative impact removed	

5: Human Rights Impacts

The Human Rights Act 1998 sets out the fundamental rights and freedoms that everyone in the UK is entitled to. It incorporates the rights set out in the European Convention on Human Rights (ECHR) into domestic British law. The Human Rights Act came into force in the UK in October 2000

The Act sets out our human rights in a series of 'Articles'. Each Article deals with a different right.

Use this guide to understand more about [Human Rights](#).

5.1 What impact could this policy have on Human Rights?

Human Rights Article	Negative	Neutral	Positive
Article 2: Right to life		X	
Article 4: Prohibition of slavery and forced labour		X	
Article 5: Right to liberty and security		X	
Article 6: Right to a fair trial		X	
Article 7: No punishment without law		X	
Article 8: Right to respect for private and family life, home and correspondence		X	
Article 9: Freedom of thought, belief and religion		X	
Article 10: Freedom of expression		X	
Article 11: Freedom of assembly and association		X	
Article 12: Right to marry and start a family		X	
Article 14: Protection from discrimination in respect of these rights and freedoms		X	
Article 1 of Protocol 1: Right to peaceful enjoyment of your property		X	
Article 2 of Protocol 1: Right to education	X		
Article 3 of Protocol 1: Right to participate in free elections		X	

5.2 In what way will the policy impact Human Rights?

The Education (Scotland) Act 1980 states that 'The authority must provide or secure the provision of a school lunch free of charge' where entitlement is via the low income route. The Act also states that 'The authority may provide or secure the provision of food or drink to other pupils.'

5.3 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (if applicable)?

The service will continue to encourage all customers of the service, whether they are entitled to a free school meal or not, to take their lunch in school on a daily basis.

If mitigations are in place, does this remove or reduce the negative impact?

No – negative impact remains

Yes – negative impact reduced

Yes - negative impact removed

X

6: Children and Young People’s Rights Impacts

The United Nations Convention has 54 articles that cover all aspects of a child’s life and set out the civil, political, economic, social and cultural rights that all children everywhere are entitled to. It also explains how adults and governments must work together to make sure all children can enjoy all their rights.

Children’s rights apply to every child/young person under the age of 18 and to adults still eligible to receive a “children’s service” e.g. care leavers aged 18-26 years old.

You can [read the full UN Convention \(pdf\)](#), or [just a summary \(pdf\)](#), to find out more about the rights that are included.

6.1 What impact could this policy have on the rights of Children and Young People?

	Negative	Neutral	Positive
PROVISION			
Article 2: non-discrimination		X	
Article 3: best interests of the child provision and protection	X		
Article 5: parental guidance and a child's evolving capacities		X	
Article 16: right to privacy		X	
Article 17: access to information from the media		X	
Article 18: parental responsibilities and state assistance		X	
Article 22: refugee children		X	
Article 23: children with a disability		X	
Article 24: health and health services		X	
Article 26: social security		X	
Article 27: adequate standard of living		X	
Article 28: right to education		X	
Article 29: goals of education		X	
Article 30: children from minority or indigenous groups		X	
Article 31: leisure, play and culture		X	
Article 39: recovery from trauma and reintegration		X	
Article 40: juvenile justice		X	
PROTECTION			
Article 6: life, survival and development	X		
Article 7: birth registration, name, nationality, care		X	
Article 8: protection and preservation of identity		X	
Article 9: Separation from parents		X	
Article 10: family reunification protection		X	
Article 11: abduction and non-return of children		X	
Article 15: freedom of association		X	
Article 19: protection from violence, abuse and neglect		X	
Article 20: children unable to live with their family		X	
Article 21: adoption		X	
Article 25: review of treatment in care		X	
Article 33: drug abuse		X	
Article 34: sexual exploitation		X	
Article 35: abduction, sale and trafficking		X	
Article 36: other forms of exploitation		X	
Article 37: inhumane treatment and detention		X	
Article 38: war and armed conflicts		X	

Article 32: child labour		X	
PARTICIPATION			
Article 12: respect for the views of the child		X	
Article 13: freedom of expression		X	
Article 14: freedom of thought, belief and religion		X	
Article 42: knowledge of rights		X	

6.2 In what way will the policy impact the rights of Children and Young People?

It could be argued that increasing the price of a school meal may make it less affordable for parents and carers and force them to consider other less nutritionally beneficial options for feeding their children at lunch time. This wouldn't be in the best interests of the child and it may also negatively impact upon their physical and mental development, and long term wellbeing.

6.3 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (if applicable)?

Continuing universal and low-income free school meal provision.

If mitigations are in place, does this remove or reduce the negative impact?

No – negative impact remains

Yes – negative impact reduced

Yes - negative impact removed

X

7: Environmental Impacts

Aberdeen City Council has a duty to meet its legal environmental responsibilities by working towards Net Zero emissions, adapting to climate change, and acting in a way it considers most sustainable. We must also fulfil the [biodiversity duty](#) and [sustainable procurement duty](#).

This section in the Integrated Impact Assessment demonstrates that these considerations that have been made in the policy, that the impact of proposals made is understood and accepted, and what mitigating steps can be taken to reduce any negative impact of the policy.

Use this guide to understand more on the legal climate change duty: [Climate change - gov.scot \(www.gov.scot\)](#) and find out more about how Aberdeen is adapting to Climate Change: [Aberdeen Adapts | Aberdeen City Council](#)

7.1 What is the impact of this policy on any of the below climate, environmental and waste considerations?

	Negative	Neutral	Positive
Council or City-wide carbon emissions	X		X
Active and sustainable travel		X	
Facilities for local living		X	
Resilience and adaptability to flooding and weather events		X	
Biodiversity improvement and wildlife/habitat connectivity		X	
Water consumption and drainage		X	
Pollution (air, water, noise, light and land contamination)		X	
Impact on resource use and waste	X		X
Sustainable procurement of goods and services		X	

7.2 In what way will the policy impact the environment?

Food is strongly linked to carbon emissions and biodiversity impacts. If pupils bring packed lunches who previously didn't this may transfer the environmental impact from the Council to city-wide. If pupils started to take a school lunch who didn't previously the reverse may happen.

There are also likely to be waste impacts. There may be less food waste produced from school kitchens if less meals are produced, but this could be offset by more waste being produced from brought in packed lunches.

7.3 What considerations have been made in reaching the above assessment?

What internal or external data has been considered? What does this data tell us?

Consultation on potential impacts with Sustainability Officers.

What consultation and engagement has been undertaken with local groups, partner organisations, experts etc? Where required, identify any other environmental assessments that have been completed.

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- Make the food/drinks cheaper
- Don't cut school meals as some kids aren't able to be fed at home.
- I disagree with cutting free school meals because some people can't afford them.

7.4 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (if applicable)?

Continued promotion of the benefits of school meals on children and young person's health, wellbeing and fuel for learning.

Continued use of cashless catering pre-order systems to minimise the amount of food waste being produced on site.

If mitigations are in place, does this remove or reduce the negative impact?

No – negative impact remains

Yes – negative impact reduced

Yes - negative impact removed

X

8: Sign Off

Any further positive or negative impacts on individuals or groups that have been considered?
No other impacts considered
Does the policy relate to the Council's Equality Outcomes? If yes, how.
No
Overall summary of changes made to the policy as a result of impact assessment.
No changes
Outline how the impact of policy will be monitored.
Through discussion with Head Teachers, Premises Responsible Persons, Service Managers and Chief Officers.
If there are any remaining negative impacts after mitigation, what is the justification for why this policy should proceed.
<p>There is a requirement to ensure the Council sets a balanced budget, which requires difficult decisions to be taken and this includes proposals with negative impacts.</p> <p>That being said, the service cannot justify this proposal going ahead, as the provision of compliant, healthy and nutritious food for our young people in our schools has positive impacts on educational and long term health outcomes.</p> <p>This option would require for employees to be redeployed or made redundant. As such, this IIA should be read in conjunction with IIA Workforce Reduction, Restructure and Redesign</p>

Assessment Author	Andy Campbell
Date	31 Jan 2025
Chief Officer	Stephen Booth
Date	21 Feb 2025