

Equality Impact Assessment

EIA Title: Twelve15 2025/26 Budget Efficiencies

Did you use the EIA Screening Tool? (Delete as applicable)

Yes (please attach upon submission)

1. Explaining the matter being assessed

Is this a:

(Delete the ones that don't apply)

- Other

Summarise the strategy, policy, service(s), or function(s) being assessed. Describe current status followed by any changes that stakeholders would experience.

Twelve15 offers a traded catering service to schools to enable them to meet their statutory obligation of providing free school meals.

The contractual agreement/SLA in place with schools, includes an annual uplift of the paid meal price for Key Stage 2 (KST2) pupils who are not eligible to a means tested free school meal. The price review is applicable each September for the life of the arrangement. The next uplift is due in September 2025 when the price of a paid meal is subject to a ten pence uplift, taking the price for a paying customer from £2.80 to £2.90.

The price review forms a key element of the Twelve15 2025/26 budget as offset to the inflation pressures in the cost of service delivery.

The impact of the price review will only affect those customers who pay for a school meal. This group sits in the Key Stage 2 cohort of pupils aged between 7 to 11 years old. The price increase may impact affordability for some families whose children may not be eligible to a free school meal particularly at a time of cost-of-living pressures.

This assessment considers if the price review for September 2025 disproportionately impacts pupils in KST2 with protected characteristics or who are from an identifiable vulnerable group.

There is no impact to Twelve15 staff as a consequence of the price uplift.

Equality Impact Assessment

How does your service proposal support the outcomes in [the Community Vision for Surrey 2030](#)?

This is aligned to the organisational principles set out in the Surrey Way that:

We seek out preventative, commercial and efficient approaches to help us be financially sustainable.

Are there any specific geographies in Surrey where this will make an impact?

(Delete the ones that don't apply)

- County-wide

Twelve15 school customers are County wide.

Assessment team – A key principle for completing impact assessments is that they should not be done in isolation. Consultation with affected groups and stakeholders needs to be built in from the start, to enrich the assessment and develop relevant mitigation.

Detail here who you have involved with completing this EIA. For each include:

Name	Job title	Organisation	Team role
Joe Osborne	Policy & Strategy Lead	Surrey County Council	Corporate overview & expertise
Schools Finance Team		Surrey County Council	Equality data for Surrey Schools from census data

2. Service Users / Residents

Who may be affected by this activity?

There are 9 protected characteristics (Equality Act 2010) to consider in your proposal. These are:

1. Age including younger and older people
2. Disability
3. Gender reassignment
4. Pregnancy and maternity
5. Race including ethnic or national origins, colour or nationality
6. Religion or belief including lack of belief
7. Sex
8. Sexual orientation
9. Marriage/civil partnerships

Though not included in the Equality Act 2010, Surrey County Council recognises that there are other vulnerable groups which significantly contribute to inequality across the county and therefore they should also be considered within EIAs. If relevant, you will need to include information on the following vulnerable groups (Please **refer to the EIA guidance** if you are unclear as to what this is).

- Members/Ex members of armed forces and relevant family members (in line with the Armed Forces Act 2021 and [Statutory Guidance on the Armed Forces Covenant Duty](#))
- Adult and young carers*
- Those experiencing digital exclusion*
- Those experiencing domestic abuse*
- Those with education/training (literacy) needs
- Those experiencing homelessness*
- Looked after children/Care leavers*
- Those living in rural/urban areas
- Those experiencing socioeconomic disadvantage*
- Out of work young people)*
- Adults with learning disabilities and/or autism*
- People with drug or alcohol use issues*
- People on probation
- People in prison
- Migrants, refugees, asylum seekers
- Sex workers
- Children with Special educational needs and disabilities*
- Adults with long term health conditions, disabilities (including SMI) and/or sensory impairment(s)*
- Older People in care homes*
- Gypsy, Roma and Traveller communities*
- Other (describe below)

(*as identified in the Surrey COVID Community Impact Assessment and the Surrey Health and Well-being Strategy)

Equality Impact Assessment

AGE

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Residents with children aged between 7 to 11 years old whose children attend schools where Twelve15 is the catering provider, may be impacted by the price uplift. Only those pupils who are not entitled to a means tested free school meal may be impacted. The increase in price of the meal may impact affordability for some families who pay for a school meal. The current daily price of the school meal is £2.80/£14 per week rising to £2.90/£14.50 in September 2025.

Positive impacts:

- Enables Twelve15 to offer a compliant school meal service to schools
- Ensures quality marks of the food served are maintained to the highest standards thus benefiting pupils receiving a healthy, balanced school meal
- Enables Surrey County Council to deliver a commercially viable service

Negative impacts:

- Potential to limit or prevent access to a health school meal for some pupils
- Possible impact on education & learning if hunger is not satisfied at lunchtime
- Impact overall health and wellbeing of child

There are 27,788 KST2 pupils on role in the schools where Twelve15 is the catering provider, of which 15% are currently eligible for free school meals.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

To maintain access to a school meal, all families are encouraged through their school setting to apply for free school meals where the eligibility criteria are met. Schools regularly remind parents/carers of the application process as, in addition to receiving free school meals, schools also receive a pupil premium for all pupils who are eligible in support of their education. Surrey County Council offer to schools a school meal eligibility checker service to support them with this process.

Legislation is currently being considered to make provision about the automatic registration of all children eligible for free school meals and to provide for an opt-out where the family wishes. Further information on this matter can be found via the following link: [Free School Meals \(Automatic Registration of Eligible Children\) Bill - Parliamentary Bills - UK Parliament](#)

Automated registration will ensure all families who are eligible for free school meals are captured and therefore minimise impact.

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

None that are known.

Any negative impacts that cannot be mitigated?

Some paying customers may be impacted if their circumstances do not meet the eligibility criteria for a free school meal and therefore the cost of the school meal will rise by 10 pence per day/50 pence per week for these children in September 2025.

Equality Impact Assessment

DISABILITY

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Pupil's with a disability who are aged between 7 to 11 years and attend schools where Twelve15 is the catering provider, may be impacted by the price uplift in the event that they are not entitled to a means tested free school meal.

Positive impacts:

- Enables Twelve15 to offer a compliant school meal service to schools
- Ensures quality marks of the food served are maintained to the highest standards thus benefiting pupils receiving a healthy, balanced school meal
- Enables Surrey County Council to deliver a commercially viable service

Negative impacts:

- Potential to limit or prevent access to a health school meal for some pupils
- Possible impact on education & learning if hunger is not satisfied at lunchtime
- Impact overall health and wellbeing of child

Data on disability is currently being sought for the 27,788 pupils in KST2.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

To maintain access to a school meal, all families with children who have a registered disability are encouraged through their school setting to apply for free school meals where the eligibility criteria are met. Schools regularly remind parents/carers of the application process as, in addition to receiving free school meals, schools also receive a pupil premium for all pupils who are eligible in support of their education. Surrey County Council offer to schools a school meal eligibility checker service to support them with this process.

Legislation is currently being considered to make provision about the automatic registration of all children eligible for free school meals and to provide for an opt-out where the family wishes. Further information on this matter can be found via the following link: [Free School Meals \(Automatic Registration of Eligible Children\) Bill - Parliamentary Bills - UK Parliament](#)

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What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

None that are known.

Any negative impacts that cannot be mitigated?

Some paying customers may be impacted if their circumstances do not meet the eligibility criteria for a free school meal and therefore the cost of the school meal will rise by 10 pence per day/50 pence per week for these children in September 2025.

Equality Impact Assessment

RACE including ethnic or national origins, colour or nationality

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Pupil's who are aged between 7 to 11 years and attend schools where Twelve15 is the catering provider, may be impacted by the price uplift in the event that they are not entitled to a means tested free school meal. Pupils of differing religions and beliefs or non beliefs be affected by the price uplift.

Is there any data on how many KST2 pupils in the schools are identified in this group?

Details on the service users/residents that could be affected. What information (data) do you have about them? How might they be impacted in a positive or negative way? (try to be as specific as possible)

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

To maintain access to a school meal, all families with children of differing religions and beliefs or non beliefs are encouraged through their school setting to apply for free school meals where the eligibility criteria are met. Schools regularly remind parents of the application process as in addition to receiving free school meals, schools also receive a pupil premium for all pupils who are eligible in support of their education. Surrey County Council offer to schools a free school meal eligibility checker service to support them with this process.

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None that are known.

Any negative impacts that cannot be mitigated?

Some paying customers may be impacted if their circumstances do not meet the eligibility criteria for a free school meal and therefore the cost of the school meal will rise by 10 pence per day/50 pence per week for these children in September 2025.

RELIGION or belief including lack of belief

Equality Impact Assessment

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Pupil's who are aged between 7 to 11 years and attend schools where Twelve15 is the catering provider, may be impacted by the price uplift in the event that they are not entitled to a means tested free school meal. Pupils of differing race including ethnic or national origins, colour or nationality may be affected by the price uplift.

Positive impacts:

- Enables Twelve15 to offer a compliant school meal for some pupils
- Ensures quality marks of the food served are maintained to the highest standards thus benefiting pupils receiving a healthy, balanced school meal
- Enables Surrey County Council to deliver a commercially viable service

Negative impacts:

- Potential to limit or prevent access to a health school meal for some pupils
- Possible impact on education & learning if hunger is not satisfied at lunchtime
- Impact overall health and wellbeing of child

Of 27,788 pupils in KST2, insight on race including ethnic or national origins, colour or nationality data are as follows:

desc	Number	%
Any other Asian background AOTH Any other Asian background	521	1.9%
Any other Black background BOTH Any other Black background	70	0.3%
Any other ethnic group OOTH Any other ethnic group	246	0.9%
Any other mixed background MOTH Any other mixed background	595	2.1%
Any other white background WOTH Any other white background	153	0.6%
Bangladeshi ABAN Bangladeshi	142	0.5%
Black - African BAFR Black - African	486	1.7%
Black Caribbean BCRB Black Caribbean	51	0.2%
Chinese CHNE Chinese	268	1.0%
Gypsy / Roma WROM Gypsy / Roma	135	0.5%
Indian AIND Indian	869	3.1%
Information not yet obtained NOBT Information not yet obtained	218	0.8%
not found	3335	12.0%
Pakistani APKN Pakistani	515	1.9%
Refused REFU Refused	195	0.7%
Traveller of Irish heritage WIRT Traveller of Irish heritage	58	0.2%
White - British WBRI White - British	18472	66.5%
White - Irish WIRI White - Irish	147	0.5%
White and Asian MWAS White and Asian	731	2.6%
White and Black African MWBA White and Black African	289	1.0%
White and Black Caribbean MWBC White and Black Caribbean	292	1.1%

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

To maintain access to a school meal, all families are encouraged through their school setting to apply for free school meals where the eligibility criteria are met. Schools regularly remind parents/carers of the application process as, in addition to receiving free school meals, schools also receive a pupil premium for all pupils who are eligible in support of their education. Surrey County Council offer to schools a school meal eligibility checker service to support them in this.

Legislation is currently being considered to make provision about the automatic registration of all children eligible for free school meals and to provide for an opt-out where the family wishes. Further information on this matter can be found via the following link: [Free School Meals \(Automatic Registration of Eligible Children\) Bill - Parliamentary Bills - UK Parliament](#)

Equality Impact Assessment

Automated registration will ensure all families who are eligible for free school meals are captured and therefore minimise impact.

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

None that are known.

Any negative impacts that cannot be mitigated?

Some paying customers may be impacted if their circumstances do not meet the eligibility criteria for a free school meal and therefore the cost of the school meal will rise by 10 pence per day/50 pence per week for these children in September 2025.

RELIGION or belief including lack of belief

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Pupil's who are aged between 7 to 11 years and attend schools where Twelve15 is the catering provider, may be impacted by the price uplift in the event that they are not entitled to a means tested free school meal. Pupils of differing religions and beliefs or non-beliefs may be affected by the price uplift.

Positive impacts:

- Enables Twelve15 to offer a compliant school meal service to schools
- Ensures quality marks of the food served are maintained to the highest standards thus benefiting pupils receiving a healthy, balanced school meal
- Enables Surrey County Council to deliver a commercially viable service

Negative impacts:

- Potential to limit or prevent access to a health school meal each school day
- Possible impact on education & learning if hunger is not satisfied at lunchtime
- Impact overall health and wellbeing of child

Insight on religion, belief/lack of belief is currently being sought for the 27,788 pupils in KST2.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

To maintain access to a school meal, all families with children who have a registered disability are encouraged through their school setting to apply for free school meals where the eligibility criteria are met. Schools regularly remind parents of the application process as in addition to receiving free school meals, schools also receive a pupil premium for all pupils who are eligible in support of their education. Surrey County Council offer to schools a free school meal eligibility checker service to support them in this.

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Automated registration will ensure all families who are eligible for free school meals are captured and therefore minimise impact.

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

None that are known.

Any negative impacts that cannot be mitigated?

Some paying customers may be impacted if their circumstances do not meet the eligibility criteria for a free school meal and therefore the cost of the school meal will rise by 10 pence per day/50 pence per week for these children in September 2025.

SEX

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Pupil's who are aged between 7 to 11 years and attend schools where Twelve15 is the catering provider, may be impacted by the price uplift in the event that they are not entitled to a means tested free school meal. KST2 pupils of different sex may be affected by the price uplift.

Positive impacts:

- Enables Twelve15 to offer a compliant school meal service to schools
- Ensures quality marks of the food served are maintained to the highest standards thus benefiting pupils receiving a healthy, balanced school meal
- Enables Surrey County Council to deliver a commercially viable service

Negative impacts:

- Potential to limit or prevent access to a health school meal for some pupils
- Possible impact on education & learning if hunger is not satisfied at lunchtime
- Impact overall health and wellbeing of child

Of 27,788 pupils in KST2, 49% are female and 51% are male.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

To maintain access to a school meal, all families are encouraged through their school setting to apply for free school meals where the eligibility criteria are met. Schools regularly remind parents/carers of the application process as, in addition to receiving free school meals, schools also receive a pupil premium for all pupils who are eligible in support of their education. Surrey County Council offer to schools a school meal eligibility checker service to support them in this.

Legislation is currently being considered to make provision about the automatic registration of all children eligible for free school meals and to provide for an opt-out where the family wishes. Further information on this matter can be found via the following link: [Free School Meals \(Automatic Registration of Eligible Children\) Bill - Parliamentary Bills - UK Parliament](#)

Equality Impact Assessment

Automated registration will ensure all families who are eligible for free school meals are captured and therefore minimise impact.

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

None that are known.

Any negative impacts that cannot be mitigated?

Some paying customers may be impacted if their circumstances do not meet the eligibility criteria for a free school meal and therefore the cost of the school meal will rise by 10 pence per day/50 pence per week for these children in September 2025.

SEXUAL ORIENTATION

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Pupil's who are aged between 7 to 11 years and attend schools where Twelve15 is the catering provider, may be impacted by the price uplift in the event that they are not entitled to a means tested free school meal. Pupils with different sexual orientation may be affected by the price uplift.

Positive impacts:

- Enables Twelve15 to offer a compliant school meal service to schools
- Ensures quality marks of the food served are maintained to the highest standards thus benefiting pupils receiving a healthy, balanced school meal
- Enables Surrey County Council to deliver a commercially viable service

Negative impacts:

- Potential to limit or prevent access to a health school meal for some pupils
- Possible impact on education & learning if hunger is not satisfied at lunchtime
- Impact overall health and wellbeing of child

Insight on sexual orientation is currently being sought for the 27,788 pupils in KST2.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

To maintain access to a school meal, all families are encouraged through their school setting to apply for free school meals where the eligibility criteria are met. Schools regularly remind parents/carers of the application process as, in addition to receiving free school meals, schools also receive a pupil premium for all pupils who are eligible in support of their education. Surrey County Council offer to schools a school meal eligibility checker service to support them in this.

Legislation is currently being considered to make provision about the automatic registration of all children eligible for free school meals and to provide for an opt-out where the family wishes. Further information on this matter can be found via the following link: [Free School Meals \(Automatic Registration of Eligible Children\) Bill - Parliamentary Bills - UK Parliament](#)

Equality Impact Assessment

Automated registration will ensure all families who are eligible for free school meals are captured and therefore minimise impact.

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

None that are known.

Any negative impacts that cannot be mitigated?

Some paying customers may be impacted if their circumstances do not meet the eligibility criteria for a free school meal and therefore the cost of the school meal will rise by 10 pence per day/50 pence per week for these children in September 2025.

THOSE WITH EDUCATION (LITERACY) NEEDS

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Pupil's who are aged between 7 to 11 years and attend schools where Twelve15 is the catering provider, may be impacted by the price uplift in the event that they are not entitled to a means tested free school meal. Pupils with educational (literacy) needs may be affected by the price uplift.

Positive impacts:

- Enables Twelve15 to offer a compliant school meal service to schools
- Ensures quality marks of the food served are maintained to the highest standards thus benefiting pupils receiving a healthy, balanced school meal
- Enables Surrey County Council to deliver a commercially viable service

Negative impacts:

- Potential to limit or prevent access to a health school meal for some pupils
- Possible impact on education & learning if hunger is not satisfied at lunchtime
- Impact overall health and wellbeing of child

Data on pupils with education (literacy) needs is currently being sought for the 27,788 pupils in KST2.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

To maintain access to a school meal, all families are encouraged, through their school setting to apply for free school meals where the eligibility criteria are met. Schools regularly remind parents/carers of the application process as, in addition to receiving free school meals, schools also receive a pupil premium for all pupils who are eligible in support of their education. Surrey County Council offer to schools a school meal eligibility checker service to support them in this.

Legislation is currently being considered to make provision about the automatic registration of all children eligible for free school meals and to provide for an opt-out where the family wishes. Further information on this matter can be found via the following link: [Free School Meals \(Automatic Registration of Eligible Children\) Bill - Parliamentary Bills - UK Parliament](#)

Equality Impact Assessment

Automated registration will ensure all families who are eligible for free school meals are captured and therefore minimise impact.

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

None that are known.

Any negative impacts that cannot be mitigated?

Some paying customers may be impacted if their circumstances do not meet the eligibility criteria for a free school meal and therefore the cost of the school meal will rise by 10 pence per day/50 pence per week for these children in September 2025.

LOOKED AFTER CHILDREN

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Pupil's who are aged between 7 to 11 years and attend schools where Twelve15 is the catering provider, may be impacted by the price uplift in the event that they are not entitled to a means tested free school meal. Pupils who are cared for by Surrey County Council as Corporate Parent may be affected by the price uplift.

Positive impacts:

- Enables Twelve15 to offer a compliant school meal service to schools
- Ensures quality marks of the food served are maintained to the highest standards thus benefiting pupils receiving a healthy, balanced school meal
- Enables Surrey County Council to deliver a commercially viable service

Negative impacts:

- Limit or prevent access to a health school meal for some pupils
- Impact education & learning if hunger is not satisfied at lunchtime
- Impact overall health and wellbeing of child

Data on pupils who are looked after children is currently being sought for the 27,788 pupils in KST2.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

To maintain access to a school meal, all families with children who have a registered disability are encouraged through their school setting to apply for free school meals where the eligibility criteria are met. Schools regularly remind parents/carers of the application process as in addition to receiving free school meals, schools also receive a pupil premium for all pupils who are eligible in support of their education. Surrey County Council offer to schools a school meal eligibility checker service to support them in this.

Legislation is currently being considered to make provision about the automatic registration of all children eligible for free school meals and to provide for an opt-out where the family wishes. Further information

Equality Impact Assessment

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Automated registration will ensure all families who are eligible for free school meals are captured and therefore minimise impact.

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

None that are known.

Any negative impacts that cannot be mitigated?

Some paying customers may be impacted if their circumstances do not meet the eligibility criteria for a free school meal and therefore the cost of the school meal will rise by 10 pence per day/50 pence per week for these children in September 2025.

YOUNG CARERS

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Pupil's who are aged between 7 to 11 years and attend schools where Twelve15 is the catering provider, may be impacted by the price uplift in the event that they are not entitled to a means tested free school meal. Pupils who are young carers may be affected by the price uplift.

Positive impacts:

- Enables Twelve15 to offer a compliant school meal service to schools
- Ensures quality marks of the food served are maintained to the highest standards thus benefiting pupils receiving a healthy, balanced school meal
- Enables Surrey County Council to deliver a commercially viable service

Negative impacts:

- Potential to limit or prevent access to a health school meal for some pupils
- Possible impact on education & learning if hunger is not satisfied at lunchtime
- Impact overall health and wellbeing of child

Of the 27,788 pupils in KST2, 1.7% pupils are known to be young carers.

To maintain access to a school meal, all families are encouraged through their school setting to apply for free school meals where the eligibility criteria are met. Schools regularly remind parents of the application process as, in addition to receiving free school meals, schools also receive a pupil premium for all pupils who are eligible in support of their education. Surrey County Council offer to schools a school meal eligibility checker service to support them in this.

Legislation is currently being considered to make provision about the automatic registration of all children eligible for free school meals and to provide for an opt-out where the family wishes. Further information on this matter can be found via the following link: [Free School Meals \(Automatic Registration of Eligible Children\) Bill - Parliamentary Bills - UK Parliament](#)

Equality Impact Assessment

Automated registration will ensure all families who are eligible for free school meals are captured and therefore minimise impact.

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

None that are known.

Any negative impacts that cannot be mitigated?

Some paying customers may be impacted if their circumstances do not meet the eligibility criteria for a free school meal and therefore the cost of the school meal will rise by 10 pence per day/50 pence per week for these children in September 2025.

THOSE EXPERIENCING SOCIOECONOMIC DISADVANTAGE

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Residents with children aged between 7 to 11 years old whose children attend schools where Twelve15 is the catering provider, may be impacted by the price uplift. Only those pupils who are not entitled to a means tested free school meal may be impacted. The increase in price of the meal may impact affordability for some families who pay for a school meal. The current daily price of the school meal is £2.80/£14 per week rising to £2.90/£14.50 in September 2025.

Positive impacts:

- Enables Twelve15 to offer a compliant school meal service to schools
- Ensures quality marks of the food served are maintained to the highest standards thus benefiting pupils receiving a healthy, balanced school meal
- Enables Surrey County Council to deliver a commercially viable service

Negative impacts:

- Potential to limit or prevent access to a health school meal for some pupils
- Possible impact on education & learning if hunger is not satisfied at lunchtime
- Impact overall health and wellbeing of child

Data on families known to be experiencing socioeconomic disadvantage is currently being sought for the 27,788 pupils in KST2.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

To maintain access to a school meal, all families are encouraged through their school setting to apply for free school meals where the eligibility criteria are met. Schools regularly remind parents/carers of the application process as, in addition to receiving free school meals, schools also receive a pupil premium

Equality Impact Assessment

for all pupils who are eligible in support of their education. Surrey County Council offer to schools a school meal eligibility checker service to support them in this.

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What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

None that are known.

Any negative impacts that cannot be mitigated?

Some paying customers may be impacted if their circumstances do not meet the eligibility criteria for a free school meal and therefore the cost of the school meal will rise by 10 pence per day/50 pence per week for these children in September 2025.

CHILDREN WITH SPECIAL EDUCATION NEEDS & DISABILITIES

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Pupil's who are aged between 7 to 11 years and attend schools where Twelve15 is the catering provider, may be impacted by the price uplift in the event that they are not entitled to a means tested free school meal. Pupils with special education needs and disabilities may be affected by the price uplift.

Positive impacts:

- Enables Twelve15 to offer a compliant school meal service to schools
- Ensures quality marks of the food served are maintained to the highest standards thus benefiting pupils receiving a healthy, balanced school meal
- Enables Surrey County Council to deliver a commercially viable service

Negative impacts:

- Potential to limit or prevent access to a health school meal for some pupils
- Possible impact on education & learning if hunger is not satisfied at lunchtime
- Impact overall health and wellbeing of child

Of the 27,788 pupils in KST2, 5% of pupils have an Education, Health & Care Plan and 14% receive support in SEN settings.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

To maintain access to a school meal, all families are encouraged through their school setting to apply for free school meals where the eligibility criteria are met. Schools regularly remind parents/carers of the application process as, in addition to receiving free school meals, schools also receive a pupil premium

Equality Impact Assessment

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What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

None that are known.

Any negative impacts that cannot be mitigated?

Some customers with special education needs & disability may be impacted if their family circumstances do not meet the eligibility criteria for a free school meal and therefore the cost of the school meal will rise by 10 pence per day/50 pence per week for these children in September 2025.

GYPSY, ROMA & TRAVELLER COMMUNITIES

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Residents with children aged between 7 to 11 years old whose children attend schools where Twelve15 is the catering provider, may be impacted by the price uplift. Only those pupils who are not entitled to a means tested free school meal may be impacted. Pupils from Gypsy, Roma & Traveller communities may be affected by the price uplift.

Positive impacts:

- Enables Twelve15 to offer a compliant school meal service to schools
- Ensures quality marks of the food served are maintained to the highest standards thus benefiting pupils receiving a healthy, balanced school meal
- Enables Surrey County Council to deliver a commercially viable service

Negative impacts:

- Limit or prevent access to a health school meal for some pupils
- Impact education & learning if hunger is not satisfied at lunchtime
- Impact overall health and wellbeing of child

Of 27,788 KST2 pupils, 0.5% are known to be from Gypsy, Roma & Traveller communities.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

To maintain access to a school meal, all families are encouraged through their school setting to apply for free school meals where the eligibility criteria are met. Schools regularly remind parents of the

Equality Impact Assessment

application process as, in addition to receiving free school meals, schools also receive a pupil premium for all pupils who are eligible in support of their education. Surrey County Council offer to schools a school meal eligibility checker service to support them in this.

Legislation is currently being considered to make provision about the automatic registration of all children eligible for free school meals and to provide for an opt-out where the family wishes. Further information on this matter can be found via the following link: [Free School Meals \(Automatic Registration of Eligible Children\) Bill - Parliamentary Bills - UK Parliament](#)

Automated registration will ensure all families who are eligible for free school meals are captured and therefore minimise impact.

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

None that are known.

Any negative impacts that cannot be mitigated?

Some Gypsy, Roma & Traveller customers may be impacted if their family circumstances do not meet the eligibility criteria for a free school meal and therefore the cost of the school meal will rise by 10 pence per day/50 pence per week for these children in September 2025.

Equality Impact Assessment

3. Staff

There is no impact on staff through the implementation of a school meal price uplift in September 2025.

4. Recommendation

Based your assessment, please indicate which course of action you are recommending to decision makers. You should explain your recommendation below.

- **Outcome One: No major change to the policy/service/function required.** This EIA has not identified any potential for discrimination or negative impact, and all opportunities to promote equality have been undertaken
- **Outcome Two: Adjust the policy/service/function** to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?
- **Outcome Three: Continue the policy/service/function** despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are:
 - Sufficient plans to stop or minimise the negative impact
 - Mitigating actions for any remaining negative impacts plans to monitor the actual impact.
- **Outcome Four: Stop and rethink the policy** when the EIA shows actual or potential unlawful discrimination. (For guidance on what is unlawful discrimination, refer to the [Equality and Human Rights Commission's guidance and Codes of Practice on the Equality Act](#) concerning employment, goods and services and equal pay).

Recommended outcome:

- **Outcome Three: Continue the policy/service/function**
Despite the potential for negative impact on some of the identified groups or protected characteristics, the benefit of continuing to deliver a quality, healthy school meal to KST2 pupils is considered to be of high importance. Not only does the provision enable schools to fulfil their statutory requirement to deliver free school meals to eligible pupils, it enables those pupils accessing the service to receive a nutritious, well balanced meal at lunch time.

Equality Impact Assessment

Explanation:

The provision of free school meals to all pupils in KST1 and means tested in KST2, seeks to ensure that access is made available to many of those identified in the groups above. Twelve15 will continue to work closely with schools to promote access to families eligible to free school meals wherever possible to mitigate the identified negative impacts.

Equality Impact Assessment

5. Action plan and monitoring arrangements

Insert your action plan here, based on the mitigations recommended.

Involve you Assessment Team in monitoring progress against the actions above.

Item	Initiation Date	Action/Item	Person Actioning	Target Completion Date	Update/Notes	Open/ Closed
1	As needed throughout the 2025/26 academic year	Regular updates with school customers regarding local arrangements for checking eligibility status for free school meals	Client Account Management	2025/26 academic year		
2	As needed throughout the 2025/26 academic year	Promotion of free school meals to all parents & carers via marketing activity	Customer support team	2025/26 academic year		
3	As needed throughout the 2025/26 academic year	Offer of information to schools on ways to improve awareness and eligibility to free school meals	Customer support team	2025/26 academic year		

Equality Impact Assessment

6a. Version control

Version Number	Purpose/Change	Author	Date
1			

The above provides historical data about each update made to the Equality Impact Assessment.

Please include the name of the author, date and notes about changes made – so that you can refer to what changes have been made throughout this iterative process.

For further information, please see the EIA Guidance document on version control.

Equality Impact Assessment

6b. Approval

Secure approval from the appropriate level of management based on nature of issue and scale of change being assessed.

The level of EIA sign off will depend on who the change affects. Generally speaking, for strictly internal changes, Head of Service/ Exec Director sign off should suffice. For changes affecting residents, the Cabinet Member is required to approve completed EIAs.

Approved by	Date approved
Head of Service	<i>Sarah Atkinson</i>
Executive Director	13/1/2025
Cabinet Member	13/1/2025
Directorate Equality Group/ EDI Group (If Applicable) (arrangements will differ depending on your Directorate. Please enquire with your Head of Service or the CSP Team if unsure)	

Publish:

It is recommended that all EIAs are published on Surrey County Council's website.

Please send approved EIAs to: equalityimpactassessments@surreycc.gov.uk

EIA author:

6c. EIA Team

Name	Job Title	Organisation	Team Role
Sarah Atkinson	Head of Service	Surrey County Council	Subject matter expertise
Ranj Sundal	Head of Finance	Surrey County Council	Subject matter expertise

If you would like this information in large print, Braille, on CD or in another language please contact us on:

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Equality Impact Assessment

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