

Implementation of the expanded Free School Meals eligibility arrangements for the 2026/27 academic year

Equality Impact Assessment

Protected characteristics under the Equality Act and groups with increased vulnerability	Data and insight	Equality considerations (including any adverse impacts)	Mitigation activities	Responsible department and timeframe for implementing mitigation activities
Age	18% of Torbay residents are aged under 18 years old. 55% of Torbay residents are aged between 18 to 64 years old. 27% of Torbay residents are aged 65 and older.	Positive impact for children and young people in Universal Credit households through wider access to a nutritious meal. Younger pupils and families moving between phases may need clear information. There is a risk of confusion between Universal Infant, Targeted and Expanded entitlement.	Use age-appropriate, accessible communications; provide transition reminders to families and schools; monitor take-up by school phase.	FSM Team, Education Data and schools; from September 2026 with termly monitoring during 2026/27.
Carers	- At the time of the 2021 census there were 14,900 unpaid carers in Torbay. 5,185 of these carers provided 50 hours or more of care.	Carer households may benefit from reduced food costs and a simpler route to support. Time, digital access and administrative pressures may make application or review activity harder for some carers.	Offer assisted application routes, clear reminders and alternative contact methods; use auto-enrolment where lawful and appropriate.	FSM Team and Communications; in place for implementation and reviewed during 2026/27.

Care experienced	As of January 2026, there were 277 former care experienced young people aged 18-24 in Torbay.	Care-experienced children and young people may benefit from improved food security. Those in unstable accommodation or without consistent family support may be more likely to miss communications or require help evidencing eligibility.	Work with the Virtual School, social care and leaving-care services to identify eligible children, provide supported routes and prevent gaps during placement or school moves.	FSM Team, Virtual School and Children's Social Care; from September 2026 and at education or placement transitions.
Disability	In the 2021 Census, 23.9% of Torbay residents answered that their day-to-day activities were limited a little or a lot by a physical or mental health condition or illness.	Positive impact is expected for disabled children and families who may face additional living costs. Some families may require reasonable adjustments, accessible information or help with digital processes. School catering must continue to accommodate medical diets and allergies.	Provide accessible formats, telephone and assisted support, reasonable adjustments and clear routes for dietary requirements; monitor barriers reported by families and schools.	FSM Team, SEND Services, Communications and schools; before implementation and ongoing.
Gender reassignment	In the 2021 Census, 0.4% of Torbay's community answered that their gender identity was not the same as their sex registered at birth.	No differential impact has been identified. Eligibility is determined by household benefit status and school attendance, not this protected characteristic. Respectful and confidential handling of personal information remains essential.	Use inclusive communications and maintain confidentiality; monitor complaints or evidence of differential access.	FSM Team and Communications; ongoing from September 2026.
Marriage and civil partnership	Of those Torbay residents aged 16 and over at the time of 2021 Census, 44.2% of people were	No differential impact has been identified. Eligibility applies consistently regardless of marital or civil partnership status.	Use neutral household language and monitor any evidence of differential access.	FSM Team; ongoing from September 2026.

	married or in a registered civil partnership.			
Pregnancy and maternity	- Between 2013 and 2024, the rate of live births (as a proportion of females aged 15 to 44) has been slightly but significantly higher in Torbay (average of 56.0 per 1,000) than the Southwest (53.4) and broadly in line with England (56.3). - For the period 2022 to 2024, rates in Torbay (44.6) have been significantly below England (50.0).	Positive impact may arise for pregnant people and families with new babies through reduced household food costs for school-age children. No specific adverse differential impact has been identified.	Ensure flexible contact methods and clear information about applying for existing and new children in the household.	FSM Team and Communications; ongoing from September 2026.
Race	In the 2021 Census, 96.1% of Torbay residents described their ethnicity as the following: 1.6% as Asian, Asian British or Asian Welsh 0.3% as Black, Black British, Black Welsh, Caribbean or African 1.5% as being of Mixed or Multiple ethnic groups 96.1% as White	The proposal is expected to have a positive impact for minoritised ethnic communities disproportionately represented in deprived areas. Language, literacy, trust and digital barriers may reduce take-up or understanding of Targeted and Expanded status.	Provide translated and plain-English information, interpreting support and non-digital routes; work through schools and trusted community partners; monitor take-up and queries.	FSM Team, Communications and schools; materials available from implementation and reviewed termly.

	• 0.4% described their ethnicity another way. • Black, Asian and minoritised ethnic communities are more likely to live in areas of Torbay classified as being amongst the 20% most deprived areas in England.			
Religion and belief	The 2021 Census showed that the residents in Torbay identify their religion and/or belief as the following; • 48.5% are Christian • 0.4% are Buddhist • 0.2% are Hindu • 0.6% are Muslim • Less than 0.1% are Sikh • 0.1% are Jewish • 0.7% have another religion • 43.2% have no religion • 6.3% did not answer	No adverse differential impact has been identified. Schools should continue to provide appropriate meal choices where dietary requirements are connected to religion or belief.	Schools and caterers to communicate suitable meal options and respond to identified dietary needs; monitor concerns.	Schools and catering providers; from September 2026 and ongoing.
Sex	• 51.3% of Torbay's population are female. • 48.7% of Torbay's population are male.	No differential impact has been identified. Eligibility criteria apply consistently. Monitoring should check whether take-up or access differs and whether household	Use inclusive communications and monitor take-up and enquiries for evidence of differential access.	FSM Team and Education Data; termly monitoring during 2026/27.

		communication reaches all parents and carers.		
Sexual orientation	In the 2021 Census, residents described their sexuality as follows; • 89% as Straight or Heterosexual • 1.7% as Gay or Lesbian • 1.1% as Bisexual • 0.1% as Pansexual • 0.1% described their sexuality another way • 7.4% of people didn't answer the question	No differential impact has been identified. Eligibility and service access are unrelated to this protected characteristic, and communications should remain inclusive and confidential.	Use inclusive family language, maintain confidentiality and monitor any evidence of differential access.	FSM Team and Communications; ongoing from September 2026.
Armed Forces Community	• In 2021, 3.8% of residents in England reported that they had previously served in the UK armed forces. • In Torbay, 5.9% of the population have previously served in the UK armed forces.	Service families may experience mobility and school changes, creating a risk of delayed records or missed communications. The expanded entitlement may positively support eligible households receiving Universal Credit.	Provide clear transfer and new-starter processes, remind families to update details, and liaise with schools where mobility affects records.	FSM Team and schools; from September 2026 and at school transfers.
Additional considerations	Blank	Blank	Blank	Blank
Socio-economic impacts (Including impacts on child	• Torbay is ranked as the 39th most deprived upper tier local authority in	A significant positive impact is expected through reduced household food costs and	Continue opt-out auto-enrolment, assisted applications and	Children's Services, FSM Team, Education

poverty and deprivation)	England in the Index of Multiple Deprivation 2025.	improved access to nutritious meals for children in low-income households. Risks include eligible families being missed, confusion about linked entitlements, and Expanded FSM not attracting Pupil Premium or other Targeted FSM-linked support.	proactive communications; clearly distinguish Targeted and Expanded status; review linked Transport, HAF and disadvantage policies; monitor uptake, refusals and gaps by deprivation.	Data and relevant policy leads; implementation from September 2026 with quarterly review during 2026/27.
Public Health impacts (Including impacts on the general health of the population of Torbay)	For the five-year period 2020 to 2024, data shows there is a 6-year life expectancy gap between males who live in Torbay's least and most deprived areas and, a 3-year gap for females.	Positive public health impacts are expected through improved access to regular nutritious meals, reduced food insecurity and support for children's concentration and wellbeing. Increased demand may place pressure on catering capacity and dietary provision.	Support schools to assess kitchen, staffing, dining and supervision capacity; maintain nutritional standards and arrangements for allergies and medical diets; monitor uptake and service pressures.	Public Health, Education and schools; readiness activity before implementation and monitoring throughout 2026/27.
Human Rights impacts	The proposal supports children's rights and welfare by improving access to food and education. Relevant considerations include the best interests of the child, non-discrimination, privacy and fair treatment in eligibility decisions.	Potential risks relate to inaccurate decisions, misuse of personal data or inaccessible processes. Overall impact is positive where safeguards are applied.	Apply the approved data protection framework, accurate checking and annual review, clear notices, an accessible reconsideration route, and proportionate information-sharing.	FSM Team, Information Governance and Legal; controls in place before implementation and reviewed during 2026/27.
Child Friendly	Children and young people are the principal beneficiaries.	Risks include stigma, inconsistent availability, queues or reduced	Use non-stigmatising delivery, communicate	Children's Services and

	Wider access can reduce stigma, support learning and wellbeing, and ensure more children receive a nutritious meal. Families should receive clear information and children's experience of the service should inform delivery.	choice if capacity is insufficient. The overall anticipated impact is positive.	with pupils and families, gather feedback through schools and participation routes, and act on capacity or quality concerns.	schools; from implementation with pupil and family feedback reviewed during 2026/27.
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