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**Learning from the implementation of Universal Free School Meals in Scotland using  
Normalisation Process Theory: Lessons for policymakers to engage multiple  
stakeholders**

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5

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## Abstract

In 2014/15, Universal Free School Meals (UFSM) were introduced in Scotland and England for children in their first three years of primary school. This study examined the implementation of UFSM in Scotland using normalisation process theory (NPT), a middle-range theory of implementation, to identify areas of learning for policymakers wishing to introduce or extend similar policies. **NPT is predominantly used to evaluate interventions or new technologies in healthcare settings.** Qualitative data were collected across Scotland using a case study approach shortly after implementation (n=29 school-level stakeholders) and in the following school year (n=18 school-level stakeholders and n=19 local authority-level stakeholders). Observations of lunchtime in each school were conducted at both timepoints. Data were analysed using a thematic framework approach using NPT constructs and sub-constructs. Results suggested education and catering stakeholders experiences of implementation diverged **most** around the NPT concepts of coherence, **cognitive participation**, and reflexive monitoring. Lack of coherence around the purpose and long-term benefits of UFSM appeared to reduce education stakeholders' willingness to engage with the policy beyond operational issues. In contrast, catering stakeholders identified a direct benefit to their everyday work and described receiving additional resources to deliver the policy. Overall, participants described an absence of monitoring data around the areas of greatest salience for education stakeholders. This study successfully used NPT to identify policy learning around school meals. Policymakers must increase the salience of such intersectoral policies for all relevant stakeholders involved before policy implementation, and plan adequate monitoring to evaluate potential long-term benefits.

**Keywords:** Schools; Food; Normalisation Process Theory; policy; universal; meals

## 14 **1. Introduction**

### 15 *1.1 Policy context*

16 Within the United Kingdom (UK) and beyond, school meals are a long standing proposed  
17 solution to child malnutrition. In the 19<sup>th</sup> and 20<sup>th</sup> centuries the provision of food and/or milk  
18 within schools, either via charitable organisations or the state, were framed as a policy  
19 response to alleviating hunger and the conditions arising from poor nutrition (Harris, 1995;  
20 Hurt, 1985). In the 21<sup>st</sup> century, school meals have been viewed as a potential policy to  
21 reduce the likelihood of children experiencing overweight and obesity, particularly since the  
22 introduction of standards around the nutritional quality of foods/meals that can be served  
23 (Morgan and Sonnino, 2008). Since the financial crisis of 2008, and the subsequent policies  
24 of austerity in public sector spending, and widespread experience of wage deflation, school  
25 meals are once again being promoted as a solution to child hunger (Lambie-Mumford and  
26 Sims, 2018). Around one in five children under 15 in the UK are estimated to live in  
27 households experiencing food insecurity (FAO et al., 2018; Trussel Trust, 2019) and the  
28 Trussel Trust have seen use of their foodbank network increase by 73% in the last five years  
29 (Trussel Trust, 2019).

30 Although policies to improve children's health and wellbeing often receive high  
31 levels of public support (Chambers and Traill, 2011; NHS Health Scotland, 2017; Oliver and  
32 Lee, 2005), school meals have always been a highly politicised issue. In 19<sup>th</sup> and 20<sup>th</sup> century  
33 Britain, they were criticised as absolving parents of their responsibility to feed their children  
34 (Harris, 1995; Hurt, 1985). Means testing also resulted in families not taking up their  
35 entitlement to support, and there continues to be concern about the stigma associated with  
36 taking up a Free School Meal (Sahota et al., 2014; Woodward et al., 2015).

37 After the 2010 UK general election additional funding was provided for school meals  
38 as a result of the coalition deal between the Conservative Party and the Liberal Democrats

39 (Liberal Democrats, 2010; Long, 2017). Scotland and England invested in Universal Free  
40 School Meals (UFSM) for children in their first three years of primary school, and the  
41 Scottish Government introduced UFSM within Scottish schools for children in primary  
42 school years 1-3 (P1-3) in January 2015.

43 At the 2017 general election, the Conservative Party included a manifesto  
44 commitment to remove funding for UFSM and invest instead in a universal breakfast  
45 programme, with an estimated saving of £4 billion per year (The Conservative and Unionist  
46 Party, 2017). The Labour Party campaigned for an extension of the programme to all  
47 primary school children, and continue to support this policy (Labour Party, 2017, 2019) .  
48 Opinion polling at the time suggested that members of the public supported extending the  
49 policy to all primary school children (YouGov, 2017). Following the Conservatives  
50 formation of a minority government, this manifesto commitment was dropped, and UFSM  
51 continues for children in their first three years of primary school in England. Within  
52 Scotland, the governing Scottish National Party continue to support UFSM for P1-3 children,  
53 and have committed to provide free meals to all 2, 3 and 4 year olds who benefit from  
54 increased nursery provision by 2021.

55 With the potential for expansion of UFSM provision in the UK and beyond (currently  
56 full universal provision exists only in Sweden and Finland), it is important to revisit the  
57 implementation of the current arrangements to understand the potential opportunities for  
58 success, but also the potential for policy failure in the future. In this study we do this through  
59 an evaluation of UFSM, analysed through the lens of Normalisation Process Theory (NPT).  
60 NPT is a mid-range sociological theory that has been used to explore the work that  
61 organisations, and individuals within them, undertake to normalise and embed new  
62 initiatives/interventions into routine practice (O'Donnell et al., 2017).

63

64 *1.2 Normalisation Process Theory (NPT)*

65 NPT has been used to evaluate the processes involved in the introduction and implementation  
66 of health care interventions (May and Finch, 2009; May et al., 2009; McEvoy et al., 2014;  
67 Murray et al., 2010), but has not been used widely to evaluate the process of the introduction  
68 of wider healthy policy or population health interventions (see Segrott et al. (2017) and  
69 Mackenzie et al. (2019) for exceptions). May and Finch (2009) define the normalisation  
70 process as,

71           the work that actors do as they engage with some ensemble of activities (that may  
72           include new or changed ways of thinking, acting and organizing) and by which means  
73           it becomes routinely embedded in the matrices of already existing, socially patterned,  
74           knowledge and practices. (p.540)

75

76 NPT consists of four main constructs (each with four sub-constructs) which describe the  
77 different types of work stakeholders engage in through the process of implementing and  
78 embedding a new intervention or policy. Coherence (sense-making) and Cognitive  
79 Participation (engagement) focus on the planning phase of an intervention, policy or  
80 programme, whilst Collective Action (enactment) and Reflexive Monitoring (appraisal) focus  
81 on the implementation phase (McEvoy et al., 2014). Table 1 provides an overview of the  
82 sub-constructs within NPT and their definitions.

83

84 Wood (2017) has argued that NPT has substantial potential utility as a theory to understand  
85 why some interventions in education settings might be implemented, embedded and  
86 integrated (normalised) into every day practice, and why others may not. McEvoy et al.

87 (2014) argue that an advantage to using NPT is that it can be used not only to understand past  
 88 implementation, but also future implementation. This is a key strength when considering  
 89 expansion of free school meals to a greater volume of pupils.

90

| <b>Coherence</b><br>(Sense-making)   | <b>Cognitive Participation</b><br>(Engagement)   | <b>Collective Action</b><br>(Enactment)   | <b>Reflexive Monitoring</b><br>(Appraisal)  |
|--|--|---|---|
| <i>Differentiation</i><br>Viewing policy as new way of working   | <i>Initiation</i><br>Work of actors leading policy implementation                          | <i>Interactional workability</i><br>Range of interactions actors encounter in work to enable/hinder tasks | <i>Systematisation</i><br>Formal or informal collection of information                        |
| <i>Communal specification</i><br>Work undertaken to reach shared understanding of policy aims/outcomes | <i>Enrolment</i><br>(Re)organising others  | <i>Skill set workability</i><br>Allocating work to appropriately skilled staff as policy implemented      | <i>Communal appraisal</i><br>Actors' collective evaluation of policy                          |
| <i>Individual specification</i><br>An actor's understanding of tasks required to carry out policy      | <i>Activation</i><br>Understanding practices required to sustain policy                    | <i>Relational integration</i><br>Confidence in new practices to sustain policy                            | <i>Individual appraisal</i><br>Individual actor's understand of how intervention affects them |
| <i>Internalisation</i><br>Perceived worth and benefits of engaging with policy                         | <i>Legitimation</i><br>Work to ensure actors recognise their role in policy implementation | <i>Contextual integration</i><br>Work shaped by resources and policies available                          | <i>Reconfiguration</i><br>Actors' ability to change practices to improve policy outcomes      |

91 Table 1 – Overview of Normalisation Process Theory (NPT) constructs and sub-constructs

92



93 *1.3 Aim*

94 The aim of this study was to use normalisation process theory to understand the  
95 implementation of UFSM for children in their first three years of primary school within  
96 Scotland, and to use this understanding to identify key areas of learning for any further  
97 extension of the policy within the UK and beyond.

98

99 **2. Method**

100 *2.1 Design*

101 A qualitative case-study approach was adopted to collect in-depth information from a range  
102 of relevant stakeholders about their experiences of the implementation of UFSM in Scotland.  
103 The policy came into effect on 1<sup>st</sup> January 2015 and this research was carried out March–  
104 October 2015. At timepoint 1, data were collected in the months following implementation.  
105 At timepoint 2, data were collected in the new school year, with a new intake of primary 1  
106 children. Ethical approval for the study was obtained from the University of Stirling’s  
107 Research Ethics Committee.

108         Across Scotland there are 32 local authorities with statutory responsibility for  
109 providing education and catering in over 2000 primary schools. **We aimed to collect data**  
110 **from as wide a range of local authorities across Scotland as was possible within the**  
111 **constraints of the project. We identified nine local authorities that provided a range in terms**  
112 **of population density and levels of area deprivation. We selected three of these authorities to**  
113 **collect school level data only, and six to collect local authority level data. Selected schools**  
114 **and local authorities were considered case studies. Data were collected via in-depth**  
115 **interviews and observations within schools of lunchtime. An overview of recruitment is**  
116 provided in Table 2.

| Stakeholder level | Timepoint 1<br>(March – June 2015<br>post-implementation) | Timepoint 2<br>(September – October 2015<br>new school year) |
|-------------------|---|--|
|-------------------|---|--|

### Schools (n=3)

#### *School*

##### *characteristics:*

- 6 >200 pupils
- 6 in 40% most deprived datazones
- Free School Meal uptake range 71%-99%
- 3 in rural areas
- 5 in highly urbanised areas

Lunchtime preparation & serving observations in 10 schools

##### Interviews with:

- leaders (n=10)
- head cooks (n=9)
- teachers (n=10)
- lunchtime supervisor (n=1)

Repeat observations & interviews:

- leaders (n=10)
- head cooks (n=8)

### Local authorities

(n=6)

#### *LA characteristics:*

- Deprivation levels<sup>a</sup>: 2 below 10%, 2 between 10-20%, 2 >20%
- Urban/rural classification: 2 predominantly urban; 3 mixed and 1 rural LA

Case studies in 6 selected local authorities.

##### Telephone interviews with:

- LA Catering (n=11)
- LA Education (n=5)
- Head teachers (n=3)

117 Table 2 – Sample overview

118 a Deprivation levels defined as percentage of datazones within Local Authority boundary ranked in the 20%  
119 most deprived areas according to the Scottish Index of Multiple Deprivation

120

121 *2.2 School recruitment and procedure*

122 Ten schools were recruited in the three school-level data only LAs. We recruited 3-4 schools

123 within each LA as this provided the breadth to collect data from schools with different

124 profiles within the limits of the project resources. School recruitment approaches varied by

125 LA due to LA rules and preferences for the conduct of research studies within their

126 jurisdiction. One LA sent information about the project to all schools within their area and  
127 invited them to contact the research team, with three schools (two of which shared a campus)  
128 subsequently doing so. We sent these schools the relevant project information sheets via  
129 email at that point and all three agreed to participate. In the other two LAs, schools meeting  
130 our criteria were identified via liaison between education and facilities management  
131 departments, who then invited the relevant schools to participate. Once schools had agreed to  
132 the research team contacting them, their details were forwarded to us, and we then made  
133 contact with them via email, sending the relevant participant information sheets. Our criteria  
134 were based on size, deprivation level of school postcode, and urban/rural level. School roll  
135 size ranged from 32-362. Five schools were located in older school buildings, whilst four  
136 were located in new buildings, including two schools who shared a campus and a dining  
137 space. Each school received a payment of £200 to cover the costs of staff participation in  
138 interviews.

139 School interviews were split into two timepoints in order to understand  
140 implementation in both the early stage (March – June 2015), and at the beginning of the  
141 following school year (August – September 2015). At timepoint 1, we interviewed school  
142 leaders (head and deputy head teachers) (n=10), head cooks (n=9), and P1-3 teachers (n=10).  
143 An additional interview was carried out with a member of support staff who supervised the  
144 dining hall at the schools' suggestion. These were key stakeholders within schools who the  
145 research team and project advisory group believed were likely to be involved in the  
146 implementation of UFSM and would have potentially divergent school-level perspectives.  
147 School leaders selected P1-3 teachers based on their availability and willingness to speak  
148 about the UFSM policy. At timepoint 2, we conducted a short interview with a senior leader  
149 in each school (n=10). Additional informal interviews were carried out with eight of the nine  
150 head cooks interviewed at timepoint 1. Two observations of lunchtime preparations, serving

151 and clean up were carried out within each school at timepoint 1, and a single observation at  
152 timepoint 2. Researchers made detailed field notes for each observation, and completed a  
153 structured observation pro forma for each school recording whether pre-ordering, cashless  
154 and queuing systems were in place, as well as use of the dining space, staggered servings, and  
155 lunchtime length.

156 Interview questions asked participants about: preparing for the implementation for  
157 UFSM (eg barriers and facilitators); experience of the implementation in the early stages (eg  
158 unintended consequences and mitigation of consequences); and of challenges encountered in  
159 the new school year (timepoint 2). Interviews lasted between 15 to 50 minutes. Participants  
160 provided written informed consent. All but two formal interviews were audio-recorded. A  
161 professional transcription company transcribed interviews and transcripts were checked for  
162 accuracy by the research team. Where audio-recording was not possible (for example, when  
163 head cooks were engaged in preparation and clean-up activities), detailed notes were taken  
164 instead.

165

### 166 *2.3 Local authority recruitment and procedure*

167 Data were collected at LA level from six LAs. These authorities were purposively sampled  
168 to ensure selection of a representative cross-section in terms of rurality, deprivation levels,  
169 types of catering provision and differences in level of uptake of UFSM in 2015 (Scottish  
170 Government, 2015). We wished to speak with both catering and education stakeholders  
171 within each LA to gain a range of perspectives of UFSM implementation, **with an aim of**  
172 **speaking with two from each department**. An initial list of catering and education leads was  
173 drawn up by members of the project advisory group as potential interview candidates. After  
174 making contact with these candidates, snowball sampling techniques were used to identify up  
175 to four stakeholders in each LA. Three LAs were unable to provide candidates from

176 education to participate in the study, and therefore we interviewed a nominated head teacher  
177 to gain an education perspective. In one local authority the education department did not  
178 provide any support or guidance, therefore we recruited a head teacher independently using  
179 data provided by the local facilities manager. A total of 19 participants took part in an  
180 interview, 11 from catering, five from education and three with head teachers. Sixteen  
181 individual interviews were conducted by telephone using a semi-structured topic guide.  
182 Additionally, in one LA three catering representatives participated in a small group interview.

183 Participants were provided with an abbreviated version of the interview guide in  
184 advance of the interview. Interviews included the following topic areas: structure of school  
185 meals in LA; participant's role; preparation for implementation of UFSM; feedback; barriers  
186 and facilitators to implementation; impact of policy; unintended consequences and policy  
187 learning. Interview length varied from 30-90 minutes. Participants' provided informed  
188 consent. All interviews were audio-recorded and transcribed, again via a professional  
189 transcription company, with transcripts checked for accuracy by the research team.

190

#### 191 *2.4 Analysis*

192 Transcripts from the school and local authority interviews were read and re-read by the  
193 research team. Broad inductive coding was originally carried out with extensive discussions  
194 about the similarities and differences across the school and LA levels. Data were then subject  
195 to coding using the NPT constructs discussed above as a coding frame in Nvivo 11. Codes  
196 were then examined via the different stakeholders interviewed (head cooks, school leaders,  
197 P1-3 representatives, LA catering representatives and LA education representatives). This  
198 allowed differences in approach by key groups of stakeholders to be identified. The research  
199 team engaged in continuous dialogue throughout the coding and interpretation process,

200 challenging areas of uncertainty or confusion, particularly around the definition of NPT  
201 constructs, where necessary.

202

### 203 **3. Results**

204 To understand the implementation of UFSM, we present the results under the headings of  
205 NPT constructs. The results highlight where there were areas of overlap between different  
206 groups of stakeholders, but also emphasise key differences.

207

#### 208 *3.1 Coherence*

##### 209 3.1.1 Differentiation

210 No participants described the introduction of UFSM as a completely new way of working.  
211 Multiple explanations were provided for this view, for example, school leaders stressed that  
212 all children had previously been accommodated in the dining hall, and therefore management  
213 of space, with or without introduction of UFSM, was an ongoing task. Few stakeholders  
214 described setting up new systems ahead of the implementation and instead continued with  
215 existing operational and engagement strategies.

216 In schools where a high proportion of children were eligible to receive FSM under the  
217 previous means tested system, leaders did not perceive that the policy would lead to a  
218 substantial increase in volume of meals served.

219 *We were dealing with a high number of children already who were receiving free*  
220 *school meals.* (School Senior Leader, School 6)

221 Nevertheless, catering staff at school and LA level noted that they expected UFSM would  
222 increase the volume of meals served and this would likely result in changes to their way of  
223 working. Staff recognised, and articulated, a need for a more actively managed way of

224 working not only to deal with increased demand, but also uncertainty within the initial  
225 implementation period.

226

### 227 3.1.2 Communal specification

228 LA catering staff described meeting with school head cooks and leaders ahead of policy  
229 implementation. Head cooks and school leaders also met separately. In describing these  
230 meetings these three groups of stakeholders focused primarily on the need to make the policy  
231 work. The interpretation of this was operational - ensuring that all children were adequately  
232 fed in the time available, improving and upgrading facilities and equipment, and that training  
233 was in place.

234 *We tried to sort out the operational challenges, briefed the staff, and we're very good*  
235 *in schools at making things work because we have to. These wee people need fed.*

236 (School Senior Leader, School 5)

237 Stakeholders did not describe these meetings as including discussions around the wider long-  
238 term aims of the policy, the long-term potential benefits, or the likelihood of achieving these.

239

### 240 3.1.3 Individual specification

241 Nearly all stakeholders interviewed outlined understanding of some of the key tasks that the  
242 policy's introduction would require of them individually. These again were largely  
243 operational, for example, ensuring that all children could be fed within the time allocated.  
244 Teachers and local authority education representatives did not discuss having extensively  
245 reflected on whether their everyday tasks would change in relation to UFSM's introduction.  
246 Local authority catering representatives however reported that they supported schools ahead

247 of the implementation by carrying out visits and audits of facilities, equipment and staffing  
248 levels.

249 *Where we could foresee there would be challenges within the school. So lack of space*  
250 *or not enough tables and what have you. We started to go round those head teachers*  
251 *before that and agreed trial dates for their particular school. (LA Catering Rep, LA*  
252 *2)*

253 Head cooks said they had reflected on pressure points within the lunch system in their  
254 schools, such as complicated menus, high volume days and at clear up.

255 *We had a couple of trial runs on busy days, theme days. Where instead of doing 110*  
256 *customers a day we were doing 240-250... So, we knew what we were going to be*  
257 *coming into, we knew the numbers, and we coped. (Head Cook, School 1)*

258 A key task identified by both school leaders and local authority catering representatives as  
259 being of particular importance was the need to communicate with parents about the changes  
260 to school meals.

261

#### 262 3.1.4 Internalisation

263 The most striking aspects of Coherence identified for the implementation of UFSM was  
264 internalisation, that is the work undertaken to understand the potential benefits of an  
265 intervention or policy. No one group of stakeholders had a homogeneous view on the purpose  
266 or value of the policy, and it was in this area groups of stakeholders appeared to diverge most  
267 in their understandings of the potential benefits. The results suggest substantial confusion  
268 around why the policy had been implemented, and what the main outcomes were that the  
269 policy hoped to achieve. It was also clear that the policy was viewed as being politically  
270 driven, with some stakeholders responding as both an individual citizen to it, as well as a



271 professional involved in the implementation of it. Meetings set up ahead of implementation  
272 had not appeared to focus on discussion of the potential benefits or the value of UFSM.

273 The main themes that were discussed in relation to the value or benefits of UFSM  
274 were questioning the appropriate use of public money, the potential for families to benefit  
275 financially, health and social benefits, and sustaining the school meal system.

276 Some senior school leaders, local authority education representatives and teachers  
277 questioned the introduction of a universal benefit, such as UFSM, given a financial climate in  
278 which they were facing substantial cuts to education budgets. They argued that under a  
279 means tested system the most vulnerable families were already benefitting, with limited  
280 perceived stigma, and that affluent families were now receiving unnecessary government  
281 support that could be invested in reversing cuts to teaching and support staff numbers.

282 *Some of our Head Teachers, what they're saying really is that...this sort of universal*  
283 *benefit, for instance, actually it's not needed, you know, because most of the parents*  
284 *in our local authority can well afford to pay. (LA education rep, LA 5)*

285 Some school leaders made the distinction between supporting the principal of a universal  
286 system that encouraged equality amongst children with the practical reality of running a  
287 school under severe financial pressure. Stakeholders, including some local authority catering  
288 representatives, perceived the policy to be a 'vote-winner', and cited this as its main  
289 rationale.

290 *We reckon [UFSM] was a vote catcher [Laughter]. Maybe I'm a bit too cynical in ma*  
291 *old age. It was very political. It was a vote catcher. (LA education rep, LA 4)*

292 Nevertheless, all groups of stakeholders recognised that there were a number of potential  
293 benefits to the policy. A key one was that families who previously had been ineligible for

294 assistance could now receive a meal for free, e.g. those working but managing on low  
295 incomes. School teaching staff and leaders particularly highlighted this as a policy benefit.

296 *We do have pockets of deprivation and those children I suppose in the past would*  
297 *have qualified for a free school meal. But then, we always felt there were one or two*  
298 *that maybe were just over and didn't qualify.* (P1-3 Teacher, School 9)

299 Another perceived benefit was the perception that school-provided meals were of a higher  
300 quality than lunches provided from home. Stakeholders, particularly LA catering  
301 representatives, argued that school meals helped establish healthier eating habits and exposed  
302 children to a greater variety of foods, leading to nutritional benefits, and viewed hot meals of  
303 substantially greater benefit to children than packed lunches. Stakeholders recognised a  
304 social benefit to all children sitting together eating the same meal, and head cooks and local  
305 authority catering and education representatives said they believed the policy would help  
306 boost children's school performance.

307 *I would hope that if the children are better fed at lunch time, that their learning*  
308 *experience is better in the afternoons an' that that'll have a positive effect on their*  
309 *attainment.* (LA Catering Rep, LA 1)

310 Interestingly, this was not a benefit discussed by school leaders or teachers who were the two  
311 main groups of stakeholders who questioned the nutritional quality of meals provided.

312 Finally, head cooks and LA catering representatives discussed a perceived benefit of  
313 the policy ensuring the sustainability of the school meal system. They noted that there had  
314 been a substantial financial gain to the catering departments of local authorities through the  
315 allocation of funding from the Scottish Government which allowed facilities and equipment  
316 to be upgraded. These stakeholders reported that funding had created and secured jobs,  
317 whilst the provision of a free meal engaged more children in the school lunch system early,

318 with the hope being that they would remain as paying customers in the later years of primary  
319 school.

320

### 321 *3.2 Cognitive Participation*

#### 322 3.2.1 Initiation

323 LA catering representatives were the main group of stakeholders who described leading  
324 initiatives to engage others in UFSM implementation. In liaising with school head cooks and  
325 school leaders, they attempted to engage these groups in the planning and eventual delivery  
326 of the intervention. A recurring theme that emerged across the interviews was that the  
327 separation between education and catering hampered the process of planning for  
328 implementation. LA catering representatives discussed tensions between their teams and  
329 school leaders and a lack of engagement from school leaders, particularly around increasing  
330 uptake of UFSM.

331 *Just a complete lack of co-operation. Complete lack. [School leaders] find it very*  
332 *time-consuming, they don't find it to be - they see no worth in it - so therefore they fail*  
333 *to buy into it and support [catering] in trying to maximise the numbers. (LA Catering*  
334 *Rep, LA1)*

335 **The explanation provided for this lack of cognitive participation included not seeing a benefit**  
336 **to their work, as exemplified in the quotation above, but also a reported belief that education**  
337 **colleagues were overloaded, social and physical distances within school buildings between**  
338 **catering and education contributed to siloed ways of working, and the organisational and**  
339 **financial structures within local authorities.**

340 LA Catering representatives wished to engage more directly with parents to  
341 encourage uptake, but argued that opportunities were limited by schools. LA catering

342 representatives also described a wish to engage teachers further, as they felt teachers could  
343 provide vital support in the dining hall. In one LA where the catering representatives had met  
344 enthusiasm within some schools, they asked school staff to share good practice with other  
345 schools in their local area (at joint meetings) in an attempt to engage them in the policy.

346

### 347 3.2.2 Enrolment

348 Enrolment is closely related to initiation, but focuses more on the reorganisation that ensures  
349 that key groups take forward the work needed to successfully implement the policy. In the  
350 case of UFSM, this involved some higher level discussions between the local authority  
351 catering team and school senior leaders (as highlighted as part of the initiation process),  
352 however, there was greater discussion around efforts within schools to enrol key individuals  
353 and groups ahead of the policy's implementation. For example, a head cook in one school  
354 described building relationships with dining hall supervisors to identify children not eating  
355 enough at lunchtime. School senior leaders described discussing UFSM with head cooks and  
356 other school catering staff to identify how changes could be made to ensure the smooth  
357 running of the policy.

358 *Part of that process is working with my catering colleagues, you know? I think I work*  
359 *quite closely with them, I try to build relationships there so that we can work together*  
360 *in the best way possible really. I see that as part of my role is to make sure that people*  
361 *are working together. So, as well as overseeing the systems it's about making sure*  
362 *that people collaborate and work together. (School senior manager, School 1)*

363 As previously discussed, school senior leaders described an ethos of 'making things work',  
364 and therefore articulated feeling responsible for the operational implementation of UFSM.

365

### 366 3.2.3 Activation

367 Stakeholders described undertaking a variety of tasks to sustain the intervention. Despite the  
368 view from LA catering representatives that school senior leaders were not sufficiently  
369 engaged in the implementation of the policy, the work described by these school staff  
370 suggested that they were involved in a continual process of active management of lunchtime  
371 routines. They discussed the need to ensure a positive dining experience (as did local  
372 authority representatives). This was achieved by school senior leaders being present in the  
373 dining hall, providing practical support to children, identifying pressure points, asking P1-3  
374 teachers to supervise, and implementing a buddy system with older children supporting  
375 younger ones. In a number of schools, work had been undertaken to change the timings of  
376 lunch to ensure all children could be served. Other work carried out at a school level by  
377 school teachers and senior leaders was identifying and engaging with families that they  
378 perceived would benefit most from UFSM **to encourage them to take up the meal being**  
379 **offered.**

380 LA catering representatives were also involved in activities to sustain the intervention.  
381 These included altering menus when necessary to increase their popularity or to reduce  
382 preparation time; overseeing work to upgrade to kitchen/dining facilities and equipment;  
383 arranging with head cooks taster sessions for parents and children; providing photographs of  
384 menu items to display in schools to help children make choices; and in some local authorities  
385 implementing pre-order and/or cashless systems.

386

### 387 3.2.4 Legitimation

388 Legitimation focuses on a stakeholder's belief that it is appropriate for them to be involved in  
389 the implementation of an intervention. The main area of tension identified around this area  
390 was the extent to which education staff at all levels were actively involved in implementation.

391 Indeed, whilst the ethos of ‘making things work’ helped to ensure the policy could be  
392 sustained within schools, the implication was that schools were not involved in driving  
393 forward UFSM.

394 *UFSM did implement quite smoothly, with no issues. You could argue that if you were*  
395 *planning it again, you would have spent more time on each of the sites, speaking with*  
396 *the local, the Senior Management Teams, Education teams on the sites, to say, ‘This*  
397 *is what we’re gonna be looking at. This is what’s gonna happen, potentially. How do*  
398 *you want it to work on this site?’ But actually, I’m not gonna say by default, because*  
399 *actually it worked, but by default it worked. (LA Catering Rep, LA 3)*

400 School senior leaders discussed having a role within delivery of UFSM, however, it was clear  
401 that this related to active management, rather than active leadership.

402 *The catering department, they organise everything, and my role really is just to fit*  
403 *into that system and I would say is, oversee systems and procedures and just check*  
404 *that it’s working well. Sometimes it isn’t but it’s things that are out my hands. (School*  
405 *Senior Leader, School 1)*

406 Although the time school senior leaders spent in the dining hall was described as important in  
407 ensuring lunchtime operated smoothly, a number of them highlighted that their main rationale  
408 for being present was to interact with the children. They also stressed that they desired  
409 greater recognition for the time that they and other education staff spent in supervising  
410 lunchtime.

411

412 *3.3 Collective Action*

413 3.3.1 Interactional workability

414 Participants discussed the ways in which the work they undertook as part of implementing  
415 UFSM interacted with other tasks. There were few areas reported where UFSM made  
416 accomplishing tasks easier. No longer having to collect cash from children was one of the  
417 few ways that teacher and support staff administrative time was reduced. Nevertheless, other  
418 schools reported that teacher and support staff administrative time had increased through  
419 facilitating pre-ordering systems and supervising children in dining spaces. For head cooks,  
420 the policy's implementation required extra time for preparation and clear up, storage of food  
421 had become more problematic, paperwork had increased, and some menus could no longer be  
422 delivered.

423 *It's at the end o' the day when the kids have all had their lunch an' you're left wi'*  
424 *dishes stacked sky high. That's where it came in more for us than anything...And the*  
425 *added paperwork. (Head Cook, School 7)*

426 A number and range of stakeholders discussed UFSM making it more difficult to meet  
427 Scottish Government directives on delivered hours of Physical Education each week as many  
428 dining spaces were also required for this purpose. There was concern that the policy  
429 undermined the children's dining experience, with insufficient supervision provided,  
430 increased queuing and more noise. Some participants also expressed concern about the  
431 policy increasing food waste, which they aimed to keep as low as possible. Finally, although  
432 there was acknowledgement that UFSM meant that there was less opportunity for children to  
433 be stigmatised, a small number of participants reported that it was now more difficult to  
434 identify eligibility for other means tested benefits such as clothing allowance for school  
435 uniforms and free milk.

436

437 3.3.2 Skill set workability and relational integration

438 The key points raised under these concepts overlapped and were discussed in a somewhat  
439 limited capacity and are therefore presented together. Skill set workability, the allocation of  
440 work related to UFSM, was dependent on having staff who were adequately trained and  
441 prepared to carry out the work necessary (relational integration). LA catering representatives  
442 appeared to have confidence in the skills of catering staff working in schools as the policy  
443 was implemented. Some had provided additional training to existing staff for new equipment  
444 and preparation processes. Extensive recruitment of catering staff had also taken place. For  
445 some local authorities, this recruitment had been impeded due to lack of lead-in time and the  
446 policy implementation coinciding with the Christmas period. LA catering representatives and  
447 head cooks discussed the need for staff flexibility within this environment to ensure that all  
448 tasks could be completed. In some schools, the relationship between education and catering  
449 staff was raised as an issue potentially undermining more widespread uptake of school meals,  
450 as evidenced earlier. Different stakeholders also raised concern about lack of supervision of  
451 children in the dining hall, noting that failing to support younger children at lunch could serve  
452 to undermine the policy as children could become unfocused and thus less likely to eat the  
453 food on offer. The majority of participants who raised this as an issue felt that training of  
454 dining hall supervisors would be helpful.

455 *But [supervision] is where [catering would] like to say, 'What schools need a wee bit*  
456 *of extra help in the dining room? Can we employ extra people just solely to go out in*  
457 *the dining room and assist with that process?' It would help schools and our staff. It*  
458 *would help build bridges. (LA Catering Rep, LA 2)*

459 A school senior leader and a teacher said they were concerned that poor communication  
460 between catering staff and young children also undermined the policy by contributing to a



461 poorer dining experience. Nevertheless, other school-based education staff praised catering  
462 staff communication with the children.

463           Some LA catering representatives reported that the implementation had resulted in  
464 fewer challenges than they had expected. The majority of the participants reported that they  
465 had confidence in the way in which the policy was working. Some school senior leaders felt  
466 that with their active management of lunch, the policy had been implemented successfully,  
467 whereas others commented that queuing was an ongoing issue. Some also raised concern  
468 about the capacity for the dining hall to meet demand in the longer term as school rolls  
469 increased.

470

### 471 3.3.3 Contextual integration

472 The allocation of appropriate resources was crucial to the successful implementation of the  
473 policy from catering stakeholders' perspectives. The most obvious allocation of resources  
474 came via the Scottish Government in the form of payments to local authorities. There were  
475 payments to upgrade facilities, but also payments based on a projected uptake amongst P1-3  
476 pupils. The increase in budgets for local authority catering departments allowed them to hire  
477 more staff, increase staff hours, pay overtime for staff training, upgrade facilities, and buy  
478 new equipment. Although catering staff were enthusiastic about increased financial  
479 resources, they were critical of the late notification of capital funding which had delayed  
480 some of their upgrading work. Only two stakeholders from education discussed additional  
481 funding as being a resource that they could draw from in implementing the programme.  
482 Indeed, there were complaints that widespread additional funding for administration or  
483 supervision had not been provided. This aligned with the perception that education budgets  
484 were being slashed at the same time, creating a feeling of competition around resource  
485 allocation.

486           *That's why I get annoyed about Free School Meals because our support staff budget*  
487           *is reduced but they're giving kids Free School Meals.* (School Senior Leader, School  
488           1)

489 Schools were also concerned about the long-term viability of delivering the policy  
490 successfully with increasing school rolls, citing the additional strain on dining facilities where  
491 these had not **been** upgraded or expanded.

492           Other resources drawn upon have been discussed in previous sections but included  
493 catering staff (at school and local authority level) being able to draw support from school  
494 staff, including help from older pupils. Resources included the perceived willingness of  
495 school senior leaders to make operational changes to meet increased demand, as well as  
496 school staff acting in a supervisory capacity in the dining hall. This supervision was greatly  
497 valued by LA catering representatives and several said they believed that this was an area that  
498 required further investment, as it was the best way of improving the dining experience for  
499 children. A small number of senior leaders and teaching staff noted that lunch was protected  
500 time for teachers as part of their work contract, and as such, there was no obligation or  
501 expectation upon them to provide this supervision.

502           Other resources provided by the local authority that were highlighted as being  
503 particularly important to head cooks were the redesign of menus to allow for quicker  
504 preparation on days where high volumes of children were expected to be processed through  
505 the dining hall; changing delivery arrangements to reduce pressure on storage facilities;  
506 tailoring menus to individual school circumstances; and LAs supporting cooks to introduce  
507 more taster sessions.

508

509 *3.4 Reflexive monitoring*

510

### 511 3.4.1 Systematisation

512 With the exception of uptake, there were a lack of formal mechanisms to support the  
513 systematic collection of data on outcomes in relation to the success of UFSM. Records on  
514 uptake were generally kept meticulously by head cooks, and this information was returned to  
515 local authority catering departments. Catering-related staff were therefore generally able to  
516 report uptake across the local authority using these figures. It was clear however that there  
517 was a lack of data collected around other potential outcomes of the policy, such as parent and  
518 child experiences of UFSM. Furthermore, at the time of the interviews, there did not appear  
519 to be any long-term plans to assess whether UFSM had provided an increased nutritional  
520 benefit, contributed to reducing stigma or improved children's school performance. Instead,  
521 appraisal was generally anecdotal in nature.

522 *I'm not aware of there being any way that we can feedback [to the local authority]*  
523 *what we know and what we see to them...I don't think they'd do anything about it*  
524 *anyway, because—it's a bit like everything else. Somebody that doesn't actually do*  
525 *your job makes your decisions for you and you've just got to do it. (P1-3 Teacher,*  
526 *School 7)*

527

### 528 3.4.2 Communal and individual appraisal

529 Participants were asked to consider whether USFM had been implemented successfully.  
530 There was limited discussion of different stakeholders coming together to assess whether the  
531 policy was working well. Some head cooks and school senior leaders described meeting to  
532 discuss how the policy was working, as well as some head cooks discussing this within the  
533 teams they led. There appeared to be limited communal appraisal between local authority

534 catering representatives and education-related staff, **reflective of competing priorities in day**  
535 **to day tasks.**

536 In terms of individual appraisal, the success of the intervention was judged by head  
537 cooks and LA catering representatives mainly based on uptake figures and in some cases also  
538 changes in levels of food waste. The majority were keen to increase P1-3 uptake to as high a  
539 level as possible.

540 *Last week was our first week of the Primary 1s being full-time, so our uptake last*  
541 *week was 70%. An' that's Primaries 1 to 3, vis-a-vis the numbers in the Primaries 1*  
542 *to 3. (LA Catering Rep, LA 1)*

543 In one LA, however, they did not want to increase uptake beyond current levels as they  
544 reported that the Scottish Government would only reimburse at a level of 75%, and therefore,  
545 the LA would have to subsidise above that level. Reported uptake levels were variable when  
546 compared across local authorities, but also within local authorities. Various explanations  
547 were put forward to explain differences in the levels of uptake within, and across schools.  
548 These included levels of affluence/deprivation, fussy children, menu choices, attitudes of  
549 education staff, and perceptions of the dining experience.

550 School senior leaders and P1-3 teachers focused less on uptake, and appeared to judge  
551 successful implementation of the policy operationally, i.e. whether all children in the school  
552 could be fed during the time available for lunch. This was also important to head cooks and  
553 LA catering representatives. Additional areas that were put forward as evidence for success  
554 or otherwise were the perception of the impact of UFSM on children's dining experience  
555 (noise, increased queuing); the quality and perceived nutritional value of the food available;  
556 food waste; and some additional vulnerable families benefitting from the policy.

557

558 3.4.3 Reconfiguration

559 As the UFSM policy places a statutory duty on local authorities, stakeholders were limited in  
560 the ways in which they could make changes to the policy itself. Nevertheless, there were  
561 smaller-scale changes in terms of implementation discussed by both catering and education  
562 stakeholders. For education stakeholders, evidence for reconfiguration was generally based  
563 on experiential learning, whilst catering stakeholders also drew on systematically collected  
564 data, as detailed previously.

565 Changes made by local authority catering stakeholders included increasing and  
566 monitoring catering staff ratios within schools and changing menus to make serving large  
567 numbers of children more efficient.

568 *In some schools, because the uptake is so high, we have gone to one choice of hot*  
569 *meal...to make it quicker to serve. Schools with big school rolls and smaller dining*  
570 *rooms. (LA Catering Rep, LA 4)*

571 After implementation, education stakeholders (often in discussion with school-based catering  
572 staff) were involved in making further changes to the structure of lunchtimes in response to  
573 long queues, too few seats being available, and too little time for children to finish meals. By  
574 extending the length of lunchtime, changing rotas and managing the space available, they  
575 were able to mitigate unintended consequences. A small number of education stakeholders  
576 said that they had ongoing concerns around these issues.

577 *We just spoke to [school support staff], because obviously with changes, any changes,*  
578 *like, we're speaking to them. "How's it going? What are you finding?" ...They're*  
579 *saying "No. It's too big queues, [children are] having to wait too long. They're still*  
580 *not served, the bell's ringing, so..." "Well what do you think? What will we try?" Say*

581 *“We’ll try that. If it’s not working, we’ll try something else.”* (School Senior Leader,  
582 School 9)

583 Only catering stakeholders, particularly at LA level, outlined longer-term aims in  
584 relation to reconfiguring UFSM. For most, this related to increasing uptake, enhancing the  
585 sustainability of the school meals service.

586 *We are doing kind of surveys of the different kinds of stakeholder groups so school*  
587 *management, parents, councils and pupils, to look at, and that is not just primary*  
588 *school we are doing that across all sectors to look at you know, what is good, what is*  
589 *bad, what they like, what they don’t like, what would encourage them to take meals.*  
590 (LA Catering Rep, LA 4)

591 They also voiced a strong desire to improve children’s dining experience and described ways  
592 in which this might be possible by using additional funding to improve facilities and support  
593 high quality supervision within the dining hall. Education stakeholders did not discuss any  
594 longer term aims in relation to the ongoing implementation of UFSM.

595

## 596 **4. Discussion**

### 597 *4.1 Consideration of findings*

598 The findings highlight a number of areas of learning for policymakers should they wish to  
599 expand UFSM further, or if a similar policy were to be implemented in another jurisdiction.

600 There are currently only two countries (Sweden and Finland) that offer UFSM to all children,  
601 however, researchers in numerous countries are debating how they might change their  
602 systems to improve children’s outcomes (Gaddis and Coplen, 2018; Gordon and Ruffini,  
603 2018; Hernandez et al., 2018; Lucas et al., 2017).

604           These main areas of learning relate to coherent understanding of the purpose and  
605 potential benefits of UFSM amongst the stakeholder groups involved in its implementation,  
606 and monitoring. The policy’s long-term purpose was not discussed explicitly by the relevant  
607 stakeholders. Preparatory meetings focused more on the operational work to deliver the  
608 policy, rather than explicit discussion of the aims, purpose and potential longer-term  
609 outcomes. The perception of the policy as highly politicised appeared to create resentment  
610 toward UFSM, particularly by school senior leaders. Catering staff at both school and LA  
611 levels were able to see direct benefits for their own jobs stemming from the policy’s  
612 introduction, which perhaps further normalised the policy into their practices. School senior  
613 staff were less likely to discuss the policy of being directly beneficial to their job. In 2014, an  
614 evaluability assessment of UFSM was carried out with Scottish Government policymakers,  
615 with a theory of change developed (Beaton et al., 2014). Policymakers and researchers  
616 identified the longer term purpose and benefits of UFSM as being: cost savings for families;  
617 improving the healthfulness of children’s diets, leading to child healthier weight; and better  
618 school attendance and behaviour resulting in improved educational attainment.

619           The gap between education staff’s ‘sense-making’ about the policy and those of  
620 policymakers appeared to impact on other areas of work (such as cognitive participation and  
621 collective action) around UFSM’s implementation. LA catering representatives felt that  
622 many education staff were unwilling to engage with them to deliver the policy to the highest  
623 standards possible. Indeed, although education staff discussed an ethos of ‘making things  
624 work’, and therefore a commitment to delivering the policy, this did not appear to translate  
625 into taking a lead or necessarily achieving longer term benefits of UFSM, such as nutritional  
626 benefits or improving school performance. Lack of recognition of the time educational staff  
627 provided to support UFSM by LA catering departments, particularly in terms of funding, also

628 appeared to undermine the extent to which education staff believed they had a legitimate role  
629 within the delivery of UFSM.

630         The findings presented on collective action further highlight why lack of buy-in from  
631 education staff might be problematic for the policy. It was clear that UFSM made very few  
632 tasks easier for education staff, which threatens to further undermine long term buy-in to any  
633 extension of the policy. It was evident also from interviews with catering staff how important  
634 adequate funding had been for them to implement the policy, and indeed, had helped to  
635 increase the coherence of the policy for them. Instead, education staff were provided with  
636 few extra resources, and there appeared to be an unspoken reliance on their willingness to  
637 make the policy work without financial compensation.

638         Finally, the findings on reflexive monitoring indicate that formal data were only  
639 rigorously collected on uptake. This is problematic as uptake is essentially an intermediary  
640 outcome, rather than a long term policy aim, as identified in the theory of change during the  
641 evaluability assessment (Beaton et al., 2014). Although catering staff were keen to focus on  
642 this outcome due to its relevance to their day-to-day role, it was of less relevance to education  
643 staff. Where these staff voiced support for the policy, it was in relation to nutritional benefits  
644 for children, reducing inequality and benefitting families. This suggests that there is a need  
645 to collect data systematically to measure these kind of outcomes, or use existing data sources  
646 that can provide measures of policy effectiveness (Beaton et al., 2014). Stakeholders  
647 repeatedly highlighted that there were few attempts to gain feedback on UFSM from parents  
648 or children, the groups that the policy is supposed to benefit most. Interestingly, when  
649 discussing issues related to coherence, few education staff said that they expected the policy  
650 to improve educational performance and/or attainment. It was instead LA catering  
651 representatives who identified this as a likely benefit of the policy.



652 The issues raised suggest that there are problems that need to be addressed before  
653 further extensions of the policy are implemented. The impression that education stakeholders  
654 appeared less invested in UFSM than catering stakeholders was evidenced further by the fact  
655 that education staff were involved in delivering the policy, but received little extra financial  
656 resource to enable this. Indeed, given the cuts that school senior leaders described  
657 experiencing within their budgets, a number expressed open resentment about the large-scale  
658 funding of UFSM, whilst they perceived that children’s educational experience had suffered.  
659 Without their buy-in however it is unlikely that the potential health benefits of the policy will  
660 be realised over time.

661 Wood (2017) highlights as a key barrier to change within educational contexts “policy  
662 and strategy overloads” that result in staff having too little time available to engage fully in  
663 significant change. In line with our findings, he argues,

664 The focus on coherence at the start of a change process ensures that individuals have a  
665 genuine and meaningful opportunity to discuss how a new practice is understood,  
666 what it is hoping to achieve, and what the benefits might be in adopting it. This helps  
667 to instil a greater sense of agency across the organization, and locates the change  
668 process within the team rather than positioning teachers as mere participants in  
669 someone else’s project (Wood 2017: 37).

670

#### 671 *4.2 Policy implications*

672 The results of this work **suggest** that future long-term success of an extension of Free School  
673 Meals to either younger or older children, **or in other jurisdictions**, requires greater attention  
674 by policymakers to the process of sense-making and cognitive participation for those key  
675 stakeholders involved, particularly educational stakeholders. **Japan is an exemplar country**  
676 **where this more integrated approach has been implemented, although the system is not fully**

677 universal with parents contributing to the cost of food. In Japan the Diet and Nutrition  
678 Teacher System is in place to support the delivery of school lunch, but also to provide  
679 pedagogical instruction within schools around diet and nutrition (Tanaka and Miyoshi, 2012).

680 We identified three ways that greater integration could be achieved within the UK.  
681 The first is to ensure that education also receives financial resource to implement the policy  
682 or extensions to it, for example, through funding adequately trained supervisory staff in the  
683 dining hall. The second is to collect and analyse data on outcomes that are meaningful to  
684 education stakeholders. These outcomes include the benefit to families, nutritional benefits  
685 and school performance. It was notable that none of the stakeholders described any  
686 formalised attempts to gain feedback from children and families specifically on UFSM.  
687 Some limited evaluation work has been carried out with parents around UFSM in Scotland  
688 suggesting that they welcomed and supported the policy, and were pleased with its potential  
689 to eliminate the stigma that surrounds a means-tested system (Ford et al., 2015). The third  
690 way to support the policy is to prioritise the need for strong communication at all levels  
691 between catering and education colleagues, particularly around the cognitive participation  
692 concepts of initiation, enrolment and legitimisation. This could include local authority  
693 education staff being key stakeholders in meetings around planning, designing and  
694 monitoring the policy. At school level, policy implementation seemed to be most  
695 straightforward in schools where the relationships between catering and education staff were  
696 positive and open. In these schools, head cooks and school senior leaders met ahead of  
697 policy implementation to determine the ways in which it would work best within their  
698 contexts, and revisited arrangements after implementation and in the new school year,  
699 making changes where required. These findings underline the importance of establishing  
700 partnerships at school level as part of policy development, and including schools with  
701 different relationships and organisational structures in any pilot work.

702 Previous research evaluating UFSM in other contexts are relatively limited  
703 (Oostindjer et al., 2017). Countries like Sweden and Finland provide free meals to all school  
704 children, but it is methodologically challenging to evaluate policies that have been embedded  
705 for many years in an effort to demonstrate the benefits of a universal approach. Pilot  
706 schemes have been evaluated in both Scotland and England previously, however, these  
707 evaluations have focused on relatively short term issues and outcomes (MacLardie et al.,  
708 2008; Rahim et al., 2012). In early 2018, an evaluation of UFSM in England was conducted  
709 on behalf of the Lead Association for Catering in Education (Sellen et al., 2018). Results  
710 suggested that uptake was higher than that of Scotland. Qualitative research with school  
711 leaders suggested that there was some limited recognition of UFSM as coinciding with  
712 improvements in school performance, but that these staff were reluctant to attribute this to  
713 UFSM specifically, rather than wider ranging school food policy changes. Similar to our  
714 study, some school leaders reported that the introduction of UFSM had resulted in additional  
715 senior and teaching staff time spent on catering-related issues. Further work is necessary to  
716 determine whether staff such as these faced a similar sense-making and implementation  
717 process as education staff in Scottish schools, particularly as many English schools have a  
718 direct relationship with a caterer, rather than through a local authority.

719

#### 720 *4.3 Normalisation Process Theory and understanding policy implementation*

721 As far as we aware, NPT has not been used previously to understand food policy, however,  
722 this study has benefited substantially by its application in the case of UFSM implementation.  
723 Using the NPT framework we have been able to systematically and theoretically investigate  
724 the implementation work undertaken by a range of stakeholders involved in the delivery of  
725 UFSM. A main advantage of applying the NPT framework was that the identification of

726 evidence for each of the sub-constructs within the data aided understanding of the more  
727 subtle nuances within each of the four main constructs. For example, within cognitive  
728 participation, we were able to identify that education stakeholders were undoubtedly involved  
729 in the planning stage, through activation, but were less involved in driving forward the policy  
730 and engaging others in it. The conceptualisation of each of the four main constructs as  
731 phases was also helpful in considering how the policy progressed over the year, and leant  
732 itself well to the longitudinal elements of the data where school-level stakeholders were  
733 followed up. This was especially true of the data presented on Reflexive Monitoring, where  
734 we examined how schools had reflected on the normalisation of the policy once  
735 implementation was under way, and particularly in the new school year. We are aware  
736 however, that to treat the NPT framework as a strictly linear one, oversimplifies it.  
737 Undoubtedly, there is potential to move back and forward between phases as policies are  
738 embedded, and indeed we argue that this is necessary in the case of UFSM, as education  
739 stakeholders must be engaged more in making sense of the policy if it is to be expanded  
740 successfully. We believe that this is a process that will take longer for these stakeholders to  
741 meaningfully engage with, and is reliant on the collection of data that demonstrates the  
742 potential benefits of UFSM to those stakeholders.

743         The application of NPT to UFSM also furthers understanding of the utility of NPT  
744 beyond healthcare in examining wider policy implementation. It was undoubtedly  
745 challenging to ‘translate’ some of the concepts and subdomains to apply to a policy rather  
746 than a health intervention. We were aided in this task through the work of McNaughton et al.  
747 (2020), who have ‘translated’ the concepts for application to qualitative data, which  
748 simplified some of the descriptions into less technical terminology, allowing for a clearer  
749 application to an area of policy. Nevertheless, we found some difficulties in separating out  
750 individual and collective activities at times, and found there were extensive evidence for

751 some subconstructs (eg internalisation), but less for others (relational integration). We  
752 concur with Wood (2017) that NPT is a useful framework for retrospectively examining the  
753 process of implementing educational policies and interventions, but would also be useful  
754 during the process of developing policies and interventions and anticipating issues that may  
755 act as barriers prior to implementation.

756

#### 757 *4.4 Strengths and Limitations*

758

759 A main strength of this work is that it provides one of the few academic studies of  
760 implementation universal free school meal provision. Without this kind of research, there is  
761 no evidence base on which to underpin future policy in this area nationally or internationally.  
762 This is an area that is highly policy relevant. In 2018, the UK government published an  
763 update to their childhood obesity strategy (Department of Health and Social Care, 2018).  
764 They reiterated that school meals are an area that can contribute to improving children's long-  
765 term health. The Scottish Government have similarly recognised this in their obesity  
766 strategy, and there continues to be substantial policy focus on reducing health and wider  
767 inequalities (Scottish Government, 2018).

768 A further strength within this study was our inclusion of a wide range of stakeholders.  
769 This allowed us to identify distinct differences in the response to the policy based on the role  
770 of the stakeholders involved. The study would have benefited from greater representation of  
771 local authority level education stakeholders, however, we were unable to recruit participants  
772 from this grouping in three of the six local authorities we were collecting local authority level  
773 data from, and the views of senior school leaders substituted in these areas.

774 Both a strength and limitation of this work is its focus on the Scottish context. Whilst  
775 UFSM in Scotland and England has been implemented similarly, there are likely to be  
776 contextual differences that need to be taken into account in applying any policy learning  
777 across the UK and beyond. A further limitation is that whilst we are critical that schools and  
778 local authorities had not sought the views of parents and children on UFSM, the current study  
779 also suffers from their absence. This deficit of views from end users has been criticised in  
780 NPT studies previously (McEvoy et al., 2014). More engagement with these two key  
781 stakeholder groups is required in future work.

782

#### 783 *4.4 Conclusion*

784 Interviews with key stakeholders delivering UFSM in Scotland highlighted that they were  
785 able to implement the policy as required, but that key areas need to be addressed if universal  
786 free school meal policies are to be extended or rolled out in other jurisdictions. This study  
787 has shown that the differences in opinion and approach of catering and education  
788 stakeholders must be addressed if there is to be a wider roll out of universal provision of free  
789 school meals in schools. By doing this, there is likely to be greater buy-in for all involved in  
790 delivery. Greater focus on the longer term aims of these types of policies is also essential  
791 through robust evaluation and high quality communication between all stakeholders involved.

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#### 793 **5. References**

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