



Advice NI Consultation Document for the review of Free school meals & uniform grants

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**ADVICE NI RESPONSE TO:
CONSULTATION DOCUMENT FOR THE REVIEW OF FREE SCHOOL MEALS
AND UNIFORM GRANT ELIGIBILITY CRITERIA**

February 2025

Advice NI Free School Meals Consultation Response

Advice NI understands the severe pressures on the NI Executive. We have responded to various NI Executive and Departmental budget consultations, with a consistent thread being along the lines of:

“A key concern for Advice NI in relation to this Budget settlement is in relation to the signal it sends as to the future ability of the Department to deliver on essential innovative new actions.”

It is therefore in this spirit that Advice NI responds to this consultation, flagging actions that we believe are in the category of ‘must do’ / ‘can be done’, so that emerging into the future there are some actions that happen that improve the situation in terms of improving access and indeed possibly widening the eligibility criteria and widening access to Free School Meals and Uniform Grant eligibility.

The question must be asked: are all the options flagged in the consultation paper realistic runners? If so great, if not, we feel that it would be better to focus on those options that stand a chance of implementation or indeed at the very least simply focus on improving the status quo option.

Advice NI would also point to our Press Statement¹ regarding the means testing of the Winter Fuel Payments, where we believe similar principals are in play.

“Finally to address the issue of whether consideration should be given to maintaining universal Winter Fuel Payments from the local devolved budget. This consideration needs to take place within the wider context of social security, poverty and need in Northern Ireland.”

Similar considerations will have to be weighed up in terms of universal eligibility for FSM and UG, what is the best use of resources in terms of tackling our woeful child poverty figures and perhaps that debate is best conducted in the context of an anti-poverty strategy which we assume will incorporate a child poverty element.

Equally there is a balance to be struck, a debate to be had around the relative merits of universality vs means testing. In a world of scarce resources there is of course the attraction of targeting resources towards those in greatest need. On the other hand

¹ [Means-testing Winter Fuel Payments: Not a binary choice | Advice NI](#)

(as with pensioners just above the Pension Credit level), sometimes a family being slightly financially better off and just above the Universal Credit level is no guarantee that they are not struggling and that the children are not getting enough to eat; or a family might be just over the threshold and finding the money for school lunches is difficult to find along with other school expenses; or the money saved on school lunches gives them a little extra for other things for the children. There is a perfectly valid argument that money spent on children is never wasted.

Option (g) Retain status quo This option would leave the current eligibility criteria unchanged, including the £15,000 net income threshold for those in receipt of UC.

Advice NI Response: There may be a temptation (given this option is last on the list) to ignore the possibilities presented by this option. For example Advice NI engaged with the Western Education and Library Board some years ago to improve uptake amongst low income families who were unaware of their entitlement or indeed of the value of claiming their entitlement. This pilot initiative was launched in 2008 and was referenced in the NI Audit Office Report “Promoting Good Nutrition through Healthy School Meals” published in 2011².

The range of measures implemented to achieve this included booklets to draw attention to the availability of free school meals with the eligibility criteria and details of the application process, the promotion of free school meals at Principal conference days, developing a single application form for both free school meals and the clothing allowance, promotional literature issued to schools prior to the beginning of the new academic year and proactive use of the media to promote awareness of entitlement. Other options for promotion included having open forums where families may freely discuss issues around free school meals without fear of being stigmatised and developing easy access, online application processes.

To quote from the NI Audit Office Report:

“In our view, the initiative implemented by the Western Board to encourage those entitled to free school meals to register for them, shows considerable promise. The Department told us that it had met with Advice NI and as a result has written to the other four Boards highlighting the Western Board experience and encouraging contact with Advice NI. We welcome this move and strongly recommend that the other Boards liaise with the Western Board and Advice NI to gauge how successful the initiative is in addressing low levels of free school meals uptake and use it as an exemplar in developing a similar approach among their own schools.”

Unfortunately no such contact took place.

The NI Audit Office Report also flagged a key issue at the time:

“In the longer term both the Western Board and Advice NI believe that the most comprehensive and effective solution lies in enabling the sharing of data across key stakeholders. The Board and the Department have been working with the

² [promoting good nutrition through healthy school meals.pdf](#)

Department for Social Development and the Department for Work and Pensions with a view to gaining access to the latter's Customer Information System. This would enable the Boards to identify families with school age children that meet the qualifying criteria but fail to come forward to claim their entitlement. However, it is recognised that there are significant cost implications and legislative issues in relation to the sharing of data which need to be overcome prior to the Department being able to make such improvements."

So to recap: clear, low cost options to improve the situation as it stood were put forward but not acted upon. We still believe that all these years later these options remain valid and in fact essential to improve uptake and create an environment which does not stigmatise but creates a positive sense of the value of FSM and UG.

We know that according to the latest School Meals in Northern Ireland Statistical Bulletin³ there are some depressing statistics in terms of school meals uptake generally and FSM uptake in particular:

- *"194,324 school meals, both free and paid, were taken by pupils on the school meals uptake reference date, which equates to a school meals uptake level of 62.3% by pupils present for lunch on the day.*
- *The school meals uptake level for 2022/23 is 10 percentage points higher than for 2020/21 (there was no data collected on uptake for 2021/22). Uptake of school meals in 2020/21 was affected by the COVID-19 pandemic. The school meals uptake level for 2022/23 is almost three percentage points higher than the pre-pandemic uptake level (59.5%) for 2019/20.*
- *The overall percentage of children entitled to free school meals has dropped slightly compared to the previous year (28.5%) at 27.7%. This 27.7% equates to over 96,300 free school meal entitled pupils in nursery, primary/preparatory, post-primary, and special schools.*
- *The uptake level for free school meals by entitled pupils is 79.2%; this is just over four percentage points higher than for 20/21 (74.9%) and just over one percentage point lower than in 19/20 (80.5%)."*

This first and final bullet points are an ongoing cause of grave concern and pose some serious questions for the future policy direction:

- ? What remains to be done to make school meals healthier and more nutritious?
- ? Will universality improve take up?
- ? What can more can be done to remove any stigma attached to FSMs?
- ? Should we better target scarce resources towards those who need help most?
- ? Should we broaden the criteria to include all families in receipt of Universal Credit?
- ? What can we do to improve take up of Universal Credit?

³ [School Meals in Northern Ireland 2020-21](#)

? What can we do to improve uptake levels amongst children already entitled to FSMs?

? Are we really open to taking the necessary steps to streamline the application process?

? Can we move forward on data-matching via GDPR Data Sharing Agreements to ensure entitled children receive the support they need?

Option (a) Universal FSM for pupils from nursery to P3 and unchanged income threshold on the eligibility criteria for all pupils An additional 59,500 children up to P3 receiving a universal FSM at an additional annual cost of £46m.

Option (b) Universal FSM for pupils from nursery to P7 and unchanged income threshold on the eligibility criteria for all pupils An additional 132,100 children up to P7 receiving a universal FSM at additional annual cost of £103m.

Option (c) Universal FSM for pupils in nursery to Yr14 and unchanged income threshold on the eligibility criteria for all pupils An additional 253,800 pupils up to Year 14 receiving a universal FSM at an additional annual cost of £202m.

Option (d) Raising the income threshold on the eligibility criteria for all pupils with no universal FSM Depending on the annual income threshold level between £16,000 to £20,000, an additional 3,600 to 17,100 pupils across all school years entitled to FSM and UG at an additional annual cost of £3.1m to £14.7m.

Option (e) Universal FSM for pupils from nursery to P3 AND raising income thresholds on the eligibility criteria for all pupils Depending on the annual income threshold level between £16,000 to £20,000, an additional 62,100 to 72,000 pupils either entitled to FSM and UG across all school years or receiving a universal FSM up to P3 at an additional annual cost of between £48.6m to £57.3m.

Option (f) Universal FSM for pupils from nursery to P7 AND raising income thresholds on the eligibility criteria for all pupils Depending on the annual income threshold level between £16,000 to £20,000, an additional 133,600 to 139,500 pupils either entitled to FSM and UG across all school years or receiving a universal FSM up to P7 at an additional annual cost of between £104.1m to £109.8m.

Advice NI Response: Purely on cost consideration and using the ‘no realistic prospect of implementation’ test alluded to above, Advice NI feels that any option requiring over £100m in additional resources will be very unlikely to fly. This rules out Options (b), (c) and (f).

Re Option (a): Advice NI would be supportive of this measure on the grounds that universality means less complexity, ensures that support is available to everyone and awareness should be high amongst those families affected between nursery to P3. We dislike the fact that perhaps families and children will receive help who do not particularly need it and who may perhaps not avail of it regardless of the fact that

it is there. Hence we question whether money might not be better spent on other child poverty measures which we can be certain are needed by all those within scope.

Re Option (d): Advice NI is supportive of this option but we would like to see the eligibility threshold go further to include all families in receipt of Universal Credit (and other applicable benefits). This brings an element of universality and simplicity whilst retaining a targeted approach which makes best use of scarce resources.

Re Option (e): Advice NI is supportive of this option which combines universality and widening eligibility for those attending P4 and above. Again we would have to question whether this is the best use of resources in terms of tackling our woeful child poverty figures.

Other Issues

The issue of Universal Credit uptake is inextricably linked with the Free School Meals issue. Advice NI is concerned that the figures show a significant number of families did not 'Move to UC'⁴ from tax credits (particularly amongst farmers and the self-employed⁵) and therefore could now be in the position where their children are unable to access Free School Meals. Whilst we welcome the Minister aligning the earnings threshold within Universal Credit with tax credits so that no family was deprived of Free School Meals entitlement when moving from tax credits to Universal Credit, much more needs to be done to understand (i) why many families did not move from tax credits to Universal Credit; & (ii) why other families who may be entitled to Universal Credit do not claim it and so trigger 'passporting' to Free School Meals and other support.

Undoubtedly children across Northern Ireland may be missing out on their entitlement to free school meals due to lack of registration (whether by not claiming Universal Credit or by not applying for Free School Meals). We remain convinced that automating the administrative process between Universal Credit and Free School Meals is ultimately the best way to ensure 100% uptake of Free School Meals entitlement (mindful that not all pupils who are registered as entitled to free school meals actually take the meals.) and it could go a long way to improving the 'image' of Universal Credit – which currently is one of an austerity benefit⁶.

Referring back to the NI Audit Office report 'Promoting Good Nutrition through Healthy School Meals (2011)', we would in particular highlight a number of key points which remain valid today:

- "A review by the School Food Trust found that for many pupils the uptake of healthy school meals (including free school meals) can be influenced by a number of factors such as the effectiveness of marketing, the price charged

⁴ [Advice NI publish research as Quarter of million 'legacy' benefit claims in NI set to be 'moved' to Universal Credit | Advice NI](#)

⁵ ['Move to Universal Credit' for farmers and other self-employed people: A Burden or a Benefit? | Advice NI](#)

⁶ [Universal Credit: An Austerity Benefit | Advice NI](#)

and the overall dining experience e.g. the ambience of the dining facility, the option of sitting with friends, the choice and quality of meals, presentation and customer service. The review also found that a key recommendation for increasing uptake was more effective queue and time management to ensure that pupils have sufficient time to eat their lunch and participate in other lunchtime activities.”

- Variations in the cost of and price of producing meals in schools across NI;
- Whether there is continued subsidisation of the school meals service for paying pupils – perhaps a form of whilst not Universal Free School Meals then perhaps it could be termed Universal Subsidised School Meals;

THE REVIEW OF FREE SCHOOL MEALS AND UNIFORM GRANT ELIGIBILITY CRITERIA: CONSULTATION QUESTION & ADVICE NI RESPONSES

Consultation Question 1

Later questions will ask about potential increases to the income threshold levels for those in receipt of Universal Credit. Leaving this aside, should the other current eligibility criteria remain the same?

- Yes, the eligibility criteria should remain the same

- No, the eligibility criteria should be changed

If you answered “No, the eligibility criteria should be changed”, please give further details in the space provided of how you believe the criteria should be changed.

Essential to protect the support available to the least well off. Entitlement to welfare benefits is an effective marker of poverty (see JRF UK Poverty 2025 report: [5. Groups with unacceptably high rates of poverty](#)).

However, it should be noted that income-related welfare benefits are inadequate and do not even effectively cover the costs of essentials (see Trussel Trust [Hunger in Northern Ireland](#) and JRF [Destitution in the UK 2023](#) reports).

Consultation Question 2

If a form of universal FSM provision were to be introduced in Northern Ireland, how strongly do you agree or disagree that this should prioritise younger pupils in a similar way to the rest of the UK?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

There is no clear evidence that child poverty disproportionately affects younger rather than older children, at least with regard to children of school age. [JRF data](#) (see 3T2) shows that 36% of children in families where the youngest child was aged under 5 were more likely to be in poverty, but rates of poverty were the same in families where the youngest child was aged 5 to 10 or 11 to 15 (25%). By contrast, poverty rates were much higher in families with 3 or more children (45%) and lone-parent families (44%). What is clear is that households with children suffer food insecurity more than most, with Trussell Trust data showing high demand from households with children.

An argument could potentially be made about focusing on younger pupils to establish healthy eating habits, which may contribute towards the Department's wider remit.

Consultation Question 3

In light of the Department's challenging budget position, how strongly do you agree or disagree that it should be a priority for the Department to increase the number of children that are able to access free school meals?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

The Department uses entitlement to certain social security benefits as the measure of a family's need for financial support with free school meals. Perhaps recognising

that both Tax Credits and Universal Credit are paid to working families as well as those unable to work, it sets an income threshold above which entitlement to free school meals is not provided. However, we contend that this arbitrary threshold does not reflect the financial challenges faced by most recipients of welfare benefits.

On Universal Credit, a family of 4, including 2 children, would have a maximum entitlement of £1,238.85 per month. Taking into account both the Work Allowance and the taper rate applied to earned income, this means that the family could earn approximately £2,656.45 monthly if they have housing costs covered by Universal Credit, and £2,925.45 monthly if they do not, before losing entitlement to Universal Credit entirely. For a single parent with two children these figures would be £2,248.90 and £2,517.90. These figures increase further if either parents have a health condition which prevents them from working, or one or more of the children have a disability.

It is important to emphasise that Universal Credit rates are the minimum amount the government determines claimants need to live on.

It is also worth noting that the threshold for access to Discretionary Support, which is the main source of emergency financial assistance with the cost of living in Northern Ireland, is set at a maximum annual household income of £26,769.60, which is more in line with the figures outlined above.

Consultation Question 4

If additional funding is made available to give more children free school meals, please indicate how you would prefer that it should be used?

- all be used to allow more low-income families to receive free school meals
- all be used to provide a universal free school meal to all pupils in certain younger years at school like the rest of the UK
- be split between allowing some more low-income families to receive free school meals and offering a universal free school meal to all pupils in certain year groups at school

Whilst Advice NI recognises the value in a universal approach for a number of reasons, we believe that priority needs to be given to those most in need in the first instance.

Consultation Question 5

If it were decided that the only change would be to rollout a form of universal FSM, which of the following groups of pupils would be your preference to receive a universal FSM?

- Universal FSM for full-time pupils from nursery to P3
- Universal FSM for full-time pupils from nursery to P7
- Universal FSM for full-time pupils in nursery to Yr14
- Other

No preference.

Consultation Question 6

If it were decided that the Department should rollout a form of universal FSM provision AND it should also enable more low-income pupils from all school years to be entitled to FSM, which of the following is your preferred option for who should be offered a universal FSM?

- Universal FSM for full-time pupils from nursery to P3
- Universal FSM for full-time pupils from nursery to P7
- Other (please specify)

No preference.



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