

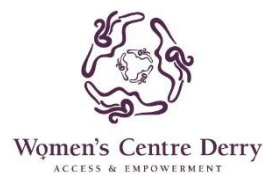


## **Consortium for the Regional Support for Women in Disadvantaged and Rural Areas**

### **Response to: Review of Free School Meals and Uniform Grant Eligibility Criteria**

**Issued by: Department of Education  
February 2025**

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Foyle Women's  
Information  
Network



# **Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas**

## **1. Introduction**

**1.1** This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, either the Women's Regional Consortium or simply the Consortium), which is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs.

**1.2** The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.<sup>1</sup> The seven groups are as follows:

- ♀ Training for Women Network (TWN) – Project lead
- ♀ Women's Resource and Development Agency (WRDA)
- ♀ Women's Support Network (WSN)
- ♀ Northern Ireland's Rural Women's Network (NIRWN)
- ♀ Women's TEC
- ♀ Women's Centre Derry
- ♀ Foyle Women's Information Network (FWIN)

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<sup>1</sup> Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisations.

**1.3** The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

**1.4** The Women's Regional Consortium appreciates the opportunity to respond to the Department of Education (DE) Review of Free School Meals and Uniform Grant Eligibility Criteria. We know from our own research with local women on the impact of the Cost-of-Living Crisis<sup>2</sup> how much school costs impact on the lives of women and families. Many of the women who were interviewed stated that educational costs put a significant financial strain on their household budgets. This included everything from the cost of school uniforms to everyday school costs including food and extra-curricular activities. 27% of the women reported that they were finding it difficult to pay the costs associated with the school day and 38% of the women felt that increased help with school costs would help them cope better with increases in the Cost of Living.

**1.5** We wish to endorse the responses made by the Women's Policy Group of which we are a member and the responses made by our colleagues in UNISON and the Rural Community Network (RCN). We fully endorse their responses and urge the Department to take their evidence fully into consideration.

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<sup>2</sup> <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/09/Cost-of-Education-Summary-from-Women-Cost-of-Living-Research.pdf>

## 2.0 General Information

We welcome the Minister's recognition in the consultation document that Free School Meals and Uniform Grants are important to a large number of families across Northern Ireland in ensuring that their children are able to access a healthy school lunch each day and have help with the costs of school uniforms. We wish to highlight the following areas which we believe must be taken into consideration when considering eligibility for free school meals and school uniforms and the fact that it is often more likely to be women who are bearing these financial costs. The wider environment has undoubtedly had an impact on household finances and their ability to pay for the essentials including the costs associated with the school day.

### 2.1 Poverty in Northern Ireland

Nearly 1 in 5 people in Northern Ireland are living in poverty, as 18% (approximately 349,000) people are considered to be in relative poverty and 14% (approximately 271,000) are considered to be in absolute poverty. In relation to child poverty, 24% of children (approximately 109,000) live in relative poverty and 19% of children (approximately 86,000) live in absolute poverty. The increase of relative child poverty from 18% in 2022 to 24% in 2023 indicates a worrying trend.<sup>3</sup>

Women are generally more likely than men to live in poverty across their lifetimes and lone parents are even more vulnerable to poverty (Census figures show that 93% of lone parents are women). In Northern Ireland the family type at the highest risk of being in relative poverty was 'single with children' at 38%.<sup>4</sup>

A Northern Ireland Audit Office report into Child Poverty in Northern Ireland<sup>5</sup> found there has been little sustained improvement in child poverty levels since 2016 and that this means that these children are more likely to have poorer health, educational and wellbeing outcomes than their more well-off peers. It also stated that child poverty brings a considerable cost to the public purse, with the estimated annual

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<sup>3</sup> [https://datavis.nisra.gov.uk/communities/PII\\_report\\_2223.html#Poverty Measures](https://datavis.nisra.gov.uk/communities/PII_report_2223.html#Poverty%20Measures)

<sup>4</sup> [https://datavis.nisra.gov.uk/communities/PII\\_report\\_2223.html](https://datavis.nisra.gov.uk/communities/PII_report_2223.html)

<sup>5</sup> Child Poverty in Northern Ireland, NI Audit Office, March 2024

<https://www.niauditoffice.gov.uk/files/niauditoffice/documents/2024-03/NI%20Audit%20Office%20Report%20-%20Child%20Poverty%20in%20Northern%20Ireland.pdf>

cost of child poverty between £825 million and £1 billion annually. According to the Northern Ireland Comptroller and Auditor General, *“an investment on reducing child poverty has the potential to result in significant long-term savings for the public purse as well as mitigating future harms caused to children as a result of growing up in poverty.”*<sup>6</sup>

Food banks in the Trussell Trust network in Northern Ireland distributed over 90,300 emergency food parcels in 2023/24. This is the highest number of parcels that the network in Northern Ireland has ever distributed and represents a 11% increase on 2022/23 levels. This percentage increase is higher than the respective figures for England (5%), Scotland (-0.1%), and Wales (1%). This is also the first time that food banks in the Trussell Trust network provided over 38,000 parcels for children in this period. These figures represent more than a doubling (143% increase) in the number of parcels distributed five years ago in 2018/19 and they are far above the levels seen before the rapid increases in the cost of living in 2021/22 (62,600 parcels). This growth in need is higher for children, with the number of parcels provided for them increasing by 151% over the five-year period between 2018/19 and 2023/24.<sup>7</sup>

The Consumer Council for Northern Ireland Household Expenditure Tracker highlights those in the lowest earning households at the bottom 25% of the income distribution have just £49.95 of discretionary income per week after spending on the basics. It also shows that Northern Ireland’s lowest earning households’ gross household income per week is £283.26 per week, 6% lower than the rest of the UK and that income from social security benefits is at 70% in Northern Ireland compared to 61% in the UK.<sup>8</sup>

One in four unpaid carers in Northern Ireland (25%) are living in poverty – significantly more than Northern Ireland’s non-carer population (16%) and higher than

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<sup>6</sup> Ibid

<sup>7</sup> <https://www.trussell.org.uk/news-and-research/latest-stats/end-of-year-stats>

<sup>8</sup> Northern Ireland Household Expenditure Tracker Q2 2024, April to June, Consumer Council, November 2024  
<https://www.consumercouncil.org.uk/research/q2-2024-northern-ireland-household-expenditure-tracker>

the carer poverty rate across the UK (23%). This means around 55,000 unpaid carers are living in poverty.<sup>9</sup>

An ARK research paper<sup>10</sup> found that around 25% of households in Northern Ireland could not afford to pay an unexpected £500 bill and just over 24% of households reported having to turn the heating down or off due to costs (over half (52.1%) of respondents who described themselves as low income had turned the heating down or off because they could not afford it). Respondents who reported financial hardship were asked to identify how they have been coping and 44.6% reported borrowing from friends and family and 26.6% reported increasing credit card debt.

The ARK research paper also found that almost half (49.3%) of respondents agreed that it was the responsibility of the government to reduce differences in income between people with high and low incomes. It found that 61.7% of respondents disagreed (24.4% strongly disagreed) that the Northern Ireland Executive is doing all that it can to reduce poverty.

## **2.2 The Impact of the Cost-of-Living Crisis on Women in Northern Ireland**

The Women's Regional Consortium and Ulster University carried out detailed research with 250 women in Northern Ireland on the impact of the Cost-of-Living Crisis on their lives and families. A research paper summarising the findings along with a shorter summary document and a topic summary specific to the costs of education are all available on the Women's Regional Consortium website here:

- **Full research paper:**  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

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<sup>9</sup> The experiences of poverty among unpaid carers in Northern Ireland, Carer Poverty Commission, August 2023

<https://www.carersuk.org/media/jb0ah2xh/the-experiences-of-poverty-among-unpaid-carers-in-northern-ireland.pdf>

<sup>10</sup> The Other Division in Northern Ireland: public attitudes to poverty, economic hardship and social security, ARK Research Update, May 2022

<https://www.ark.ac.uk/ARK/sites/default/files/2022-05/update146.pdf>

- **Summary leaflet:**  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/03/The-Impact-of-the-Cost-of-Living-Crisis-on-Women-in-NI-In-Brief-1.pdf>
- **Topic summary on the Costs of Education:**  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/09/Cost-of-Education-Summary-from-Women-Cost-of-Living-Research.pdf>

Women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time and insecure work, more likely to be providing care either for children or other family members which limits their ability to carry out paid work and more likely to have to make up for cuts to public services through unpaid work. All these factors contribute to keeping women's incomes generally lower over their lifetimes and therefore puts them at greater risk of living on a low-income and in poverty.

Women often bear the brunt of poverty in the home managing household budgets to shield their children from its worst effects. This means that women end up acting as the 'shock absorbers' of poverty going without food, heat or clothes in order to meet the needs of children and/or other family members when money is tight.<sup>11</sup> These actions taken by women are often unseen within the home and given little attention or focus in terms of policy.

***“I am now scraping along to provide food and keep a roof over mine and my child's heads. The cost to survive is atrocious.”***

***“Women are the ones who often give up/do without to absorb debt rather than let it impact on their children. I'll do without spuds and put the spud on the child's plate. Women are at the frontline of this.”***

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<sup>11</sup> A Female Face, Fabian Society Blog by Mary-Ann Stephenson, Women's Budget Group, February 2019  
<https://fabians.org.uk/a-female-face/>

***“Women normally run the house and do the grocery shopping. I’m the one buying the kids their clothes and managing the finances. You take on the financial impact of it and the constant thinking about it.”***

***“I don’t think anyone recognises the impact of this Crisis on women especially. We have a high level of responsibility and it’s impacting really badly and Government are not taking enough notice. People are suicidal and feel like a failure. I’m lying in bed at night and getting really bad intrusive thoughts to the point where I look at my daughter and think if something happens to me who will look after her? I asked the person in charge in my hostel to ring me in the morning and check if I’m OK. It’s really, really impacting on people and Government need to be more aware of the impacts of this Crisis.”***

***“Sometimes you struggle between turning the heating on and feeding the children. As a mother you’d go without to make sure the kids have what they need. I’ve made dinner sometimes and there hasn’t been enough for everyone so I’ve lied and said it’s alright I’ve eaten so that I can try and make it stretch.”***

*(Quotes taken from Women’s Regional Consortium Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)*

### **2.3 Welfare Reform/Austerity Policies and Women**

The social security system has a vital role to play in easing the impact of poverty on people and families. As the Covid19 pandemic has shown, people need to be able to rely on the social security system when times get tough and they are hit by unexpected costs or lost earnings. However, the safety net provided by the social security system has been weakened by a decade of welfare reform changes meaning that many people are unable to meet the costs of essential items such as food, heat and clothing and are unable to cope with unexpected life events such as a washing machine breaking down.

Welfare reform and austerity policies have disproportionately impacted on women. Research by the House of Commons Library shows that 86% of the savings to the Treasury through tax and benefit changes since 2010 will have come from women.<sup>12</sup>

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<sup>12</sup> Estimating the gender impact of tax and benefit changes, Richard Cracknell, Richard Keen, Commons Briefing Papers SN06758, December 2017  
<http://researchbriefings.files.parliament.uk/documents/SN06758/SN06758.pdf>



In Northern Ireland an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)<sup>13</sup> showed that across most income levels the overall cash impact of the reforms is more negative for women than for men. Their most striking finding was that households with children experience much larger losses as a result of the reforms than those without children. This is particularly the case for lone parents (who are mostly women) who lose £2,250 on average, equivalent to almost 10% of their net income.

***“Government need to increase benefits. There needs to be an increase in income whether people are working through a Living Wage and if you can’t work on a benefits system that gives you enough of an income that you’re able to live and not struggle. At the minute anyone on benefits is existing they’re not living.”***

***“It would be good if the Government could give people more money in benefits. You are expected to live off what they give you but they couldn’t do it. You have to buy shopping, clothes, gas and electricity with what they give you but you can’t do it. You can’t even afford to get a new pair of shoes, you have to borrow.”***

*(Quotes taken from Women’s Regional Consortium Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)*

## **2.4 Borrowing and Debt**

There is a lack of specific data on levels of personal debt in Northern Ireland but the data which does exist has shown that personal debt in Northern Ireland (excluding mortgages) is higher than any other part of the UK. Research by the Financial Conduct Authority (FCA)<sup>14</sup> shows adults in Northern Ireland owe £3,990 on average and adults with debts owe £10,730 on average. This compares to £3,320 and £9,570, respectively, for all UK adults. The research found that well over half (54%) of adults in Northern Ireland have either no cash savings, or savings of less than £2,000; compared with 46% in Wales, 45% in England and 43% in Scotland. These figures are likely to have increased with the impact of the pandemic and the Cost of-Living Crisis.

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<sup>13</sup> Cumulative impact assessment of tax and social security reforms in Northern Ireland, NIHRC, November 2019

[https://www.nihrc.org/uploads/publications/Final\\_CIA\\_report\\_Oct\\_2019.pdf](https://www.nihrc.org/uploads/publications/Final_CIA_report_Oct_2019.pdf)

<sup>14</sup> The financial lives of consumers across the UK, Key findings from the FCA’s Financial Lives Survey 2017, Financial Conduct Authority, June 2018 Updated January 2020

<https://www.fca.org.uk/publication/research/financial-lives-consumers-across-uk.pdf>

Borrowing and debt are far from gender neutral. Women are more likely than men to claim social security benefits, more likely to be in low-paid, part-time and insecure work, more likely to be providing unpaid care and more likely to have to make up for cuts to services through unpaid work. As women's incomes are generally lower over their lifetimes this leaves them more vulnerable to short-term financial problems or income shocks making them more likely to have to rely on borrowing and debt to make ends meet.

Research by the Women's Regional Consortium<sup>15</sup> on Women Living with Debt in Northern Ireland showed that the majority of the women's borrowing had been to fund essential items or to make ends meet. It also found that many (51%) had resorted to high-cost lending and difficulty meeting their debt repayments was a common problem (60%). Worryingly, there were also examples of borrowing through loan sharks including paramilitaries (6%). The impact of the Cost-of-Living Crisis on women's debts was evident in our subsequent research with 60% of the women reporting their debts had been impacted by rising energy prices and 60% also reporting their debts had been impacted by rising food prices.<sup>16</sup>

Low-income households are the most vulnerable to debt and increasingly are having to use borrowing to meet everyday expenditure. Research by the Joseph Rowntree Foundation<sup>17</sup> shows that Cost-of-Living increases have hit poorer households the hardest. In the poorest fifth of families 6 in 10 cannot afford an unexpected expense, more than half are in arrears and around a quarter use credit to pay essential bills.

### *Paramilitary Lending*

Some of the most vulnerable borrowers are forced into using illegal lending or 'loan sharking' because of a more urgent need for money. In Northern Ireland illegal

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<sup>15</sup> Women Living with Debt, Women's Regional Consortium, September 2022  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/Women-Living-with-Debt-1.pdf>

<sup>16</sup> Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium & Ulster University, June 2023  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

<sup>17</sup> UK Poverty 2023, Joseph Rowntree Foundation, January 2023  
[https://www.jrf.org.uk/sites/default/files/jrf/files-research/uk\\_poverty\\_2023\\_-\\_the\\_essential\\_guide\\_to\\_understanding\\_poverty\\_in\\_the\\_uk\\_0\\_0.pdf](https://www.jrf.org.uk/sites/default/files/jrf/files-research/uk_poverty_2023_-_the_essential_guide_to_understanding_poverty_in_the_uk_0_0.pdf)

lending is often linked with perceived paramilitary activity.<sup>18</sup> Research conducted by Advice NI on behalf of the Consumer Council<sup>19</sup> in Northern Ireland has highlighted that one of the themes around illegal lending is low income and lack of access to mainstream credit. Two pieces of research by the Women's Regional Consortium<sup>20</sup> with women in Northern Ireland found examples of borrowing through loan sharks including paramilitaries.

There are a range of external factors which can drive people to use illegal lending including paramilitary lending. Welfare reform/austerity policies, a constrained Budget for Northern Ireland which has seen cuts to important areas of support and the impact of the Cost-of-Living Crisis are driving more people to debt.

Research by the University of Ulster found that Universal Credit was repeatedly described as a driver for illegal lending<sup>21</sup> particularly around the harm caused by the five-week wait and issues with short-term benefits loans that were repaid from future benefits. This ensured that benefit claimants were often short of the funds they needed to support their household leading them to look to other means of getting the money they needed.

***“I’ve been to a loan shark – it’s not good. The interest they put on. If you miss a payment they are at your door – you don’t miss those payments.”***

***“I have a debt to a paramilitary lender. On every £100 I pay £30. I pay it back every 2 weeks. On £1,000 I pay £300 interest. I work full time but still have difficulty making ends meet on a low income. You ask these lenders can I borrow £1,000 today and they will leave it round to you that night.”***

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<sup>18</sup> Expensive Lending in Northern Ireland, Centre for Economic Empowerment, NICVA, May 2013  
[https://www.nicva.org/sites/default/files/d7content/attachments-resources/cee\\_expensive\\_lending\\_in\\_northern\\_ireland\\_2013.pdf](https://www.nicva.org/sites/default/files/d7content/attachments-resources/cee_expensive_lending_in_northern_ireland_2013.pdf)

<sup>19</sup> Illegal Lending – The Human Story, Advice NI, September 2019  
<https://www.adviceni.net/policy/publications/illegal-lending-human-story>

<sup>20</sup> Making Ends Meet: Women's Perspectives on Access to Lending, Women's Regional Consortium, February 2020  
[Making-Ends-Meet-Womens-Perspectives-on-Access-to-Lending.pdf \(womensregionalconsortiumni.org.uk\)](https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/Women-Living-with-Debt-1.pdf)

Women Living with Debt, Women's Regional Consortium, September 2022  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/Women-Living-with-Debt-1.pdf>

<sup>21</sup> Illegal Money Lending and Debt Project, Research Report of Findings, Ulster University and the Consumer Council, March 2020  
[Illegal Money Lending Report.PDF \(consumercouncil.org.uk\)](https://www.consumer-council.org.uk/wp-content/uploads/2020/03/Illegal-Money-Lending-Report.pdf)

***“If you can’t get a bank loan, a Credit Union loan because you have to have savings, or payday loans then after that it’s paramilitaries.”***

(Quotes taken from Women’s Regional Consortium Research paper on Women Living with Debt, September 2022)

## **2.5 Impact of Education Cuts**

The Department for Education announced that the Holiday Hunger Scheme would no longer provide support to families (approx. 96,300) entitled to Free School Meals<sup>22</sup> during holiday periods (£27 per child, every two weeks). This scheme was set up with cross-party support during the pandemic and pioneered a cash-first approach to provide families with extra support during a crisis. Research by Spyreli et al (2021) which studied the impact of Covid-19 on the food decisions of economically disadvantaged families in NI found that the Holiday Hunger Scheme, together with informal support offered through social circles was crucial for parents, particularly lone parents who needed to reduce costs and feed their family with a limited budget.<sup>23</sup>

The ‘Extended Schools Programme’ which provides support to schools in disadvantaged areas to put in place activities to support children’s learning (which included schools running Breakfast Clubs) has been subject to budget cuts.

A rapid response report detailing the consequences of the cuts to education for children and young people in Northern Ireland<sup>24</sup> concluded: *“the evidence presented strongly denotes the consequences that the current cuts to education will have on our most disadvantaged children. The schemes which have been removed sought to reduce inequalities and educational underachievement for our young citizens. If we*

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<sup>22</sup> The threshold for entitlement for Free School Meals (FSM) is extremely low at £7,400 per year (after tax and not including benefits)

<sup>23</sup> A qualitative exploration of the impact of COVID-19 on food decisions of economically disadvantaged families in Northern Ireland, BMC Public Health, December 2021  
[A qualitative exploration of the impact of COVID-19 on food decisions of economically disadvantaged families in Northern Ireland | BMC Public Health | Full Text \(biomedcentral.com\)](#)

<sup>24</sup> An updated perspective on the Cuts to Education and the Consequences for Children and Young People in Northern Ireland, November 2024  
<https://pure.ulster.ac.uk/en/publications/an-updated-perspective-on-the-cuts-to-education-and-the-consequen#:~:text=We%20concluded%20that%20the%20cuts,beyond%20the%20brink%20of%20collapse.>

*do not urgently invest in education to alleviate the experience of being in poverty and to reduce the cost of the school day, we risk putting up further socio-economic barriers which will increase educational underachievement.”* The academics involved in the production of this report further concluded: *“that the cuts would increase poverty, widen existing educational achievement gaps, further exacerbate NI’s mental health crisis and send Special Education Needs provision beyond the brink of collapse.”*

It is also important to recognise the cumulative impact of the public sector cuts across departments including communities, health, and education on the lives of women and their children. The complete removal of additional opportunities to access food in and out of school, coupled with restrictions on the Discretionary Support scheme will remove a crucial safety net for women and those at most risk of falling into financial hardship.

## **2.6 Other Regional Issues**

Research by the Northern Ireland Human Rights Commission outlined that larger family sizes are more common in Northern Ireland. ONS statistics show that 21.4% of families in Northern Ireland have three or more children, compared to 14.7% of families in the UK as a whole.<sup>25</sup>

As time goes on, the two-child limit is likely to have a disproportionate impact on families in Northern Ireland. The Department for Communities has estimated that the average number of monthly recipients on Universal Credit and Child Tax Credit affected by the policy will be 14,000 in 2022/23, rising to 16,000 in 2023/24 and 19,000 in 2024/25.<sup>26</sup> Households that are impacted by the two-child limit lose just over £287 per month per child.

Figures from the Department for Communities show that nearly one in four children are living in relative poverty (109,000 children) and nearly one in five children in

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<sup>25</sup> Cumulative impact of tax and social security reforms in Northern Ireland, NI Human Rights Commission, November 2019, [Final CIA report Oct 2019.pdf \(qub.ac.uk\)](#)

<sup>26</sup> Welfare Mitigations Review, Independent Advisory Panel Report, October 2022 <https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-welfare-mitigations-review-independent-advisory-panel-report-2022.pdf>

Northern Ireland are living in absolute poverty (86,000 children) meaning they cannot meet their basic needs. Long term trends show that children are at a higher risk of living in poverty than the overall Northern Ireland population in terms of both relative and absolute poverty.<sup>27</sup>

The impact of ongoing welfare reform policies including the two-child limit, larger family sizes and rising poverty levels in Northern Ireland particularly for children will have impacts on the ability of many low-income families to afford a range of essentials including the cost of school uniforms and school lunches. As outlined throughout this response, women will often be forced to absorb the impacts of these issues by going without essentials to try and provide for their children and families and in some cases will be unable to shield their children/families from the impacts of poverty.

## **2.7 Concerns about School Uniform Costs in Northern Ireland**

LucidTalk research commissioned by **Save the Children NI**<sup>28</sup> found that families are forced to cut back on food and fuel to cover excessive costs of school uniforms and PE kits. The research found that 1 in 3 parents have had to borrow money to cover the cost of school uniforms and PE kits with 6 in 10 families finding the costs of school uniforms and PE kits financially challenging (for low-income families this rises to over 7 in 10 (73%)). This research also showed that 78% of the public believe not enough is being done by relevant authorities to help families manage the cost of school uniforms and 99% want action taken to alleviate the financial pressure.

Research by the **Irish League of Credit Unions** in 2022<sup>29</sup> into Back-to-School costs found that 7 in 10 Northern Ireland parents (72%%) say the cost of Back to School is a financial burden - up 10% from 2021. A survey by **ParentKind**<sup>30</sup> found that parents

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<sup>27</sup> Northern Ireland Poverty and Income Inequality Report, 2022/23, NISRA & DfC, March 2024  
[https://datavis.nisra.gov.uk/communities/PII\\_report\\_2223.html#](https://datavis.nisra.gov.uk/communities/PII_report_2223.html#)

<sup>28</sup> Uncapped Costs of School Uniforms are Causing Harm, Save the Children NI, November 2023  
[https://www.savethechildren.org.uk/content/dam/gb/reports/northern-ireland/Uncapped\\_Costs\\_of\\_School\\_Uniforms\\_are\\_Causing\\_Harm.pdf](https://www.savethechildren.org.uk/content/dam/gb/reports/northern-ireland/Uncapped_Costs_of_School_Uniforms_are_Causing_Harm.pdf)

<sup>29</sup> <https://www.creditunion.ie/news/latest-news/ilcu-annual-survey-finds-rising-costs-of-living-im/>

<sup>30</sup> <https://www.parentkind.org.uk/assets/resources/The-National-Parent-Survey-UK-2023.pdf>

in Northern Ireland are more concerned about school uniform costs than parents in the rest of the UK.

Women's Regional Consortium research showed the impacts on women of costly school uniforms causing financial hardship, distress and anxiety. Women reported borrowing and using credit cards to pay for school uniforms and others went without food or heating to try and meet the costs. We believe it is often more likely to be women who are bearing these financial costs. Save the Children NI polling also showed that 6 in 10 parents find the cost of school uniforms and PE kit financially challenging rising to 73% for low-income families.<sup>31</sup>

We also wish to raise the inadequacy of the School Uniform Grant. In Northern Ireland it is significantly less than in other parts of the UK. Despite a welcome 20% rise announced in 2022 it still only provides less well-off families with children at primary school with £42.90 and those with secondary school children with £61.20 (under 15) and £67.20 (over 15) and £26.40 for PE kit. Our research has shown examples of school blazers alone costing more than the existing levels of the school uniform grant. Given widespread price increases for the essentials including clothing, cuts to important areas of help including the Holiday Hunger Scheme and inadequate support through the social security benefits system it is clear that the current levels of support through the School Uniform Grant are insufficient.

We provide the following quotes from women who have taken part in our research to show the considerable issues they face with affordability of school uniforms and the very real impacts it has on them:

***“My youngest is starting secondary school this year and I’m dreading it. It’s £65 for a blazer. The grant for a school uniform doesn’t even go anywhere near the actual costs.”***

***“I had to use a credit card for the kid’s school uniform this year. I struggled to pay the kid’s school uniform worse this year than any time before.”***

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<sup>31</sup> Uncapped Costs of School Uniforms are Causing Harm, Save the Children NI, November 2023  
[https://www.savethechildren.org.uk/content/dam/gb/reports/northern-ireland/Uncapped\\_Costs\\_of\\_School\\_Uniforms\\_are\\_Causing\\_Harm.pdf](https://www.savethechildren.org.uk/content/dam/gb/reports/northern-ireland/Uncapped_Costs_of_School_Uniforms_are_Causing_Harm.pdf)

***“The school uniform grant is nowhere near enough. Hoodies are £50, a secondary school blazer is £100. The school uniform grant should be increased and it should be open to more people.”***

***“The school uniform grant is less than £50, what would that buy you now? It’s £65 for a PE kit and £60 for my son’s shoes – he has size 11 feet.”***

***“My son is starting secondary school in September and I’m scared already. The blazer is £65. He’s 11 but he’s so tall so it’s like an adult size for his clothes and his shoes. The grant for a school uniform doesn’t even go anywhere near the actual cost of a uniform.”***

***“I have 3 kids in the house, I’m always going without to make sure they have what they need. The little one needs new school shoes and I’m trying to figure out how I’m going to pay for them. There is nowhere to take the money from. He needs them so this week I’ll cut back on gas and not do a full shop so that I can save some money for his shoes.”***

A report by academics on the consequences of the cuts to education for children and young people in Northern Ireland<sup>32</sup> highlights that financial hardship will be further compounded by the pressure of school uniform costs, stating: *“The failure of government to review the school uniform grant coupled with the Cost-of-Living Crisis has led to schools and community organisations setting up ‘uniform swaps shops’ to support local families, which relies on parents and/or teachers and local volunteers to organise, sort and distribute. An increased reliance on charitable provision can increase the stigma that parents and children feel, exacerbating feelings of social exclusion.”*

## **2.8 Concerns about Food Insecurity in Northern Ireland**

The impacts of the Cost-of-Living Crisis on the cost of food have been well documented and many low-income families are struggling to afford the essentials including food. Research by the Consumer Council shows 90% of consumers in Northern Ireland are concerned about the rising cost of basics. The cost of home energy tops consumer concerns at 91%, followed by food and non-alcoholic drinks (80%). To cope with these rising costs over a quarter (27%) of consumers reported

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<sup>32</sup> The Consequences of the Cuts to Education for Children and Young People in Northern Ireland, June 2023  
<https://www.stran.ac.uk/wp-content/uploads/2023/06/The-Consequences-of-the-Cuts-to-Education-for-Children-and-Young-People-in-Northern-Ireland-Final.pdf>



eating poorer quality or less nutritious food and 24% said they had been skipping meals or eating fewer times in the day (23%).<sup>33</sup>

Increasing foodbank use has pointed to growing concerns about the levels of food insecurity in Northern Ireland. Food banks in the Trussell Trust network in Northern Ireland distributed over 90,300 emergency food parcels in 2023/24 representing an 11% increase on 2022/23 levels.<sup>34</sup> Nearly three quarters (74%) of the support provided by food banks in Northern Ireland was for families with children. This is significantly higher than the UK average of 65%. Families with three or more children in Northern Ireland are especially likely to face severe hardship, with 37% of parcels provided by food banks in the last year being distributed to families with three or more children, again higher than the UK average (30%).

In April 2023 the school holiday food grants scheme ended and the ‘holiday hunger’ payments to the families of 96,000 children eligible for free school meals of £27 per child each fortnight during the school holidays stopped. This led some families to struggle even more to afford food particularly over the summer months.<sup>35</sup>

The Expert Advisory Panel report for a NI Anti-Poverty Strategy advocated for removing the barriers to educational experience by ensuring that participation in school is cost-free. The report recommended that *“Family outgoings can be reduced by ensuring that participation in school is cost-free, by extending free school meals provision to include school holidays, by expanding funding for the provision of breakfast and homework clubs, and by expanding Sure Start provision.”*

A report by academics on the consequences of the cuts to education for children and young people in Northern Ireland<sup>36</sup> states that the Holiday Hunger Scheme, Free

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<sup>33</sup> Consumers’ views and behaviours in response to the rising cost of basics, The Consumer Council, March 2024

<https://www.consumerCouncil.org.uk/news/90-consumers-concerned-about-rising-cost-basics>

<sup>34</sup> Emergency food parcel distribution in Northern Ireland 1 April 2023 to 31 March 2024, Trussell Trust <https://cms.trussell.org.uk/sites/default/files/wp-assets/EYS-Northern-Ireland-Factsheet-2023-24.pdf>

<sup>35</sup> <https://www.bbc.co.uk/news/uk-northern-ireland-66399979>

<sup>36</sup> The Consequences of the Cuts to Education for Children and Young People in Northern Ireland, June 2023

<https://www.stran.ac.uk/wp-content/uploads/2023/06/The-Consequences-of-the-Cuts-to-Education-for-Children-and-Young-People-in-Northern-Ireland-Final.pdf>

Period Products Scheme and support for school uniform costs are vital interventions recognising genuine needs in order to mitigate socio-economic barriers to participation in education. It recommends *“these schemes should be immediately reinstated or have full funding restored.”*

A briefing paper by the NI Commissioner for Children and Young People (NICCY)<sup>37</sup> outlines concerns about the adequacy of current FSM eligibility criteria as an effective method for targeting the provision of FSM and uniform grants at children in poverty. The paper outlines that entitlement to FSM is a very poor indicator of a child being in poverty in Northern Ireland with two in five (41%) of families in poverty not eligible for FSM between 2017 and 2020. The paper states that it is clear that the current eligibility criteria are inadequate. It demonstrates that increasing income thresholds using the other current criteria only marginally increases the proportion of children in poverty eligible for FSM - from 59% at an income threshold of £14,000, to 62% when the income threshold is raised to £17,000. The majority of children who become eligible for FSM through increasing the income threshold are not in poverty.

NICCY recommends that FSM should be provided on a universal basis, starting with younger children in the first instance, to ensure that all children receive at least one nutritious meal a day while at school, and to overcome the stigma associated with FSM. This should be expanded to older children as budget allows. NICCY also call for the requirement for families to be in receipt of state benefits to be removed as a criteria for FSM. They call for eligibility to be based solely on income levels, equivalised by family size stating it is not adequate to increase the number of children able to access FSM solely by increasing income thresholds in the eligibility criteria, as this will only marginally increase the number children in poverty accessing FSM.

The NICCY briefing states: *“FSM eligibility not only determines whether children are entitled to a FSM during school term, but also acts as a ‘proxy’ for low income within education services. It is used as a means of measuring educational inequalities and targeting resources at children from low-income households including eligibility for*

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<sup>37</sup> Briefing on Free Schools Meals Eligibility in Northern Ireland, NICCY, February 2025  
<https://www.niccy.org/wp-content/uploads/2025/02/NICCY-Briefing-on-FSM-Analysis-January-2025.pdf>

*uniform grants, an additional 'Extended Schools' payment provided to schools for each child on FSM and preferential access to other services, e.g. the 'social deprivation' criteria for pre-school places. Given its use across education services as a way of identifying and targeting support to children from low-income households, it is critical that this measure accurately reaches those on the lowest incomes."*

A recently published report on Child Poverty on the island of Ireland<sup>38</sup> has found that *"Northern Ireland's long-standing provision of free school meals to children in low-income households was recognised as an important direct support, with calls from stakeholders to expand these benefits during holiday periods and make them universal."*

It is noteworthy that an evaluation of the school meals programme in the Republic of Ireland has recommended that there should be a Universal School Meals Programme, with one free hot meal for every child in Ireland.<sup>39</sup> This follows the establishment of a European Child Guarantee with the objective to prevent and combat social exclusion by guaranteeing effective access of children in need to a set of key services including healthy nutrition. The EU Child Guarantee states that Member States should ensure that every child in need gets effective access to at least one healthy meal each school day.<sup>40</sup>

## **2.9 Move to Universal Credit and eligibility for Free School Meals and School Uniform Grants for those who are self-employed**

The Move to Universal Credit has meant that Universal Credit has become an important passport benefit for accessing help with Free Schools Meals and School Uniform Grants. However, there are well documented problems for those who are self-employed with entitlement to Universal Credit, for example, farming families seasonal workers, tradespeople and some childminders. The self-employed are a

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<sup>38</sup> Child Poverty on the island of Ireland, Economic & Social Research Institute, January 2025  
<https://www.esri.ie/system/files/publications/RS199.pdf>

<sup>39</sup> Evaluation of the School Meals Programme, Department of Social Protection, December 2022  
<https://www.gov.ie/pdf/?file=https://assets.gov.ie/251427/6b3e8499-4cca-4f32-aa7d-cbcad0b660e2.pdf#page=null>

<sup>40</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L\\_.2021.223.01.0014.01.ENG&toc=OJ%3AL%3A2021%3A223%3ATOC](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L_.2021.223.01.0014.01.ENG&toc=OJ%3AL%3A2021%3A223%3ATOC)

considerable part of the Northern Ireland economy with Census figures showing that 15% of those in employment in Northern Ireland were self-employed (127,200 people).<sup>41</sup>

Rather than being based on annual income Universal Credit is based on monthly income and where there is a cash surplus in a month (for example, because of livestock sales) it could mean no Universal Credit entitlement that month. In addition, in months where there is little/no income Universal Credit has a 'Minimum Income Floor'. The Minimum Income Floor is an assumed level of earnings that the Department for Communities uses to calculate benefit payments for self-employed people. If earnings are below the Minimum Income Floor, Universal Credit payments will be calculated using this figure rather than actual earnings that month. The Minimum Income Floor is calculated by multiplying the amount of the National Minimum Wage by the number of hours normally worked.

There are some transitional provisions to help ease the move to Universal Credit for the self-employed including a 12-month exemption from the Minimum Income Floor. However, as is highlighted by a report published by Advice NI, Rural Support and the Ulster Farmers' Union<sup>42</sup> the Minimum Income Floor is an artificial figure which punishes the self-employed: *"the notion of earning a net minimum .....per month is utterly foreign to the farmer who is losing money on cultivating his produce for market 10 months of the year; for the child-minder who doesn't work over the summer, as her employing family don't need her; or for the builder who gets paid on completion of projects which can vary from weeks to months in length. The overriding effect of the Minimum Income Floor will be to persecute hard-working, self-employed people for not having a regular income stream."*

Moving to Universal Credit can have negative implications for self-employed people who don't have a regular income each month and for those living in rural areas who

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<sup>41</sup> Main statistics for Northern Ireland, Statistical bulletin, Labour market, March 2023  
<https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-3-statistical-bulletin-labour-market.pdf>

<sup>42</sup> Universal Credit in Northern Ireland: Punishing the Self-Employed, Advice NI, Rural Support & the Ulster Farmers' Union, December 2016  
<https://www.adviceni.net/sites/default/files/2021-05/Advice%20NI%20Social%20Policy%20Report.pdf>

are more likely to be self-employed. As the National Farmers' Union has stated Universal Credit does not account for the seasonal nature of farm business income where for example a farmer may lamb sheep in the Spring but sell them in the Autumn and therefore have no income until the Autumn.<sup>43</sup>

Problems with moving to Universal Credit have been highlighted in a NISRA report into non-movers from Tax Credits to Universal Credit<sup>44</sup> which found that being self-employed had an influence on claim decision. Table 8 from the NISRA report (see below) showed that self-employed Tax Credit customers had a 16 percentage point lower Universal Credit claim rate than non self-employed people. Controlling for other factors having at least one claimant in a household being self-employed reduces the probability of claiming Universal Credit by 12 percentage points.

**Table 8 Move to UC Invitations, Claims and Rate by Employment Status**

Employment Status	Invitations	Claims	Rate
Self-employed households	7,499	4,271	57.0%
Non-Self-employed households	21,083	15,463	73.0%

The NISRA report<sup>45</sup> also shows that claim rates ranged from 64% in Fermanagh and Omagh, Mid Ulster and Newry, Mourne and Down to 76% in Belfast – see Table 10 from the report below. 72% of households in urban areas moved to Universal Credit in comparison to 64% of those in rural areas. The report found that overall, those in urban areas are 8 percentage points more likely to claim Universal Credit.

Controlling for other factors being in an urban area increases the chance of a household claiming Universal Credit by 4 percentage points with half of the disparity between the figures being eliminated by controlling for self-employment status alone.

<sup>43</sup> <https://www.nfuonline.com/updates-and-information/universal-credit-changes/>

<sup>44</sup> Move to Universal Credit (UC) Tax Credit Non-Movers Research, NISRA, 2024 <https://www.communities-ni.gov.uk/system/files/2024-12/dfc-move-to-uc-tax-credit-non-movers-research-report.pdf>

<sup>45</sup> Move to Universal Credit (UC) Tax Credit Non-Movers Research, NISRA, 2024 <https://www.communities-ni.gov.uk/system/files/2024-12/dfc-move-to-uc-tax-credit-non-movers-research-report.pdf>

This is because households in urban areas are less likely to feature a claimant who is self-employed.

**Table 10 Move to UC Invitations, Claims and Rate by Local Government District (LGD)**

LGD	Invitations	Claims	Rate
Antrim and Newtownabbey	2,118	1,505	71.0%
Ards and North Down	1,862	1,325	71.0%
Armagh City, Banbridge and Craig..	3,405	2,291	67.0%
Belfast	4,965	3,766	76.0%
Causeway Coast and Glens	2,010	1,342	67.0%
Derry City and Strabane	2,925	2,078	71.0%
Fermanagh and Omagh	1,950	1,247	64.0%
Lisburn and Castlereagh	1,705	1,200	70.0%
Mid and East Antrim	1,977	1,332	67.0%
Mid Ulster	2,674	1,720	64.0%
Newry, Mourne and Down	2,988	1,926	64.0%

The NISRA research<sup>46</sup> engaged with a number of key stakeholders and found that:

- Stakeholders noticed that self-employed customers and those in rural areas, such as farmers, encountered particular difficulties with the transition.
- Stakeholders advised that for many, the additional administrative burden seemed unmanageable, especially for those in rural areas or with limited resources, such as farmers or small business owners.
- Stakeholders mentioned that some self-employed claimants either abandoned the process shortly after beginning or simply chose not to engage at all.
- Stakeholders felt that customers, particularly self-employed individuals, feared that the transition to UC would not only reduce their financial

<sup>46</sup> Move to Universal Credit (UC) Tax Credit Non-Movers Research, NISRA, 2024  
<https://www.communities-ni.gov.uk/system/files/2024-12/dfc-move-to-uc-tax-credit-non-movers-research-report.pdf>

support but also add hidden costs—such as time spent administrating their UC claim.

- Stakeholders noted that the system feels ill-suited to self-employed individuals.

The importance of take-up of benefits and the links to entitlement to other payments (which would include entitlement to free schools meals and uniform grants) are described in a Journal of Poverty and Social Justice article.<sup>47</sup> Take-up of social security benefits is an important social policy issue revealing crucial aspects of the relationships of those involved with the state and society as a whole. *“In a welfare state such as the UK’s, relying increasingly on means-tested and conditional benefits, take-up of entitlements is likely to be lower and is therefore an even more significant concern. As Van Gestel et al (2022) argue, non-take-up therefore undermines the effectiveness and fairness of social policies. In the UK, means-tested benefits are also increasingly acting as the gateway to other provisions, including most recently one-off payments to help with the rising cost of living. This additional function of such benefits increases the significance of non-take-up, because of its knock-on effect on access to other policy instruments.”*

Written evidence by the National Farmers’ Union to the Work and Pensions Select Committee stated:

*“with the current Universal Credit regulations those who choose to be self-employed appear to be at a disadvantage, particularly if they operate seasonal businesses, carry stock, or have to invest in equipment and machinery. These businesses may receive less support than an employed individual earning the same income and with the same personal circumstances. In addition there is a risk that the economic reality of their circumstances will be ignored. In our view there is a risk this will result in a two-tier welfare system which will prevent many self-employed individuals from accessing an important welfare safety net at critical times.”<sup>48</sup>*

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<sup>47</sup> Take-up of social security benefits: past, present – and future?, Journal of Poverty and Social Justice, Volume 32, Issue 1, December 2023

[https://bristoluniversitypressdigital.com/view/journals/jpsi/32/1/article-p2.xml?tab\\_body=fulltext](https://bristoluniversitypressdigital.com/view/journals/jpsi/32/1/article-p2.xml?tab_body=fulltext)

<sup>48</sup> <https://committees.parliament.uk/writtenevidence/85750/pdf/>

Locally, Advice NI, Rural Support and the Ulster Farmers' Union (UFU) expressed their collective concern over the impact on self-employed people in Northern Ireland who will be impacted by the Move to UC.<sup>49</sup> UFU Deputy President William Irvine said:

*“Due to the nature of farming and working in line with the seasons, there will always be months where expenses are incurred with virtually no income being received. However, there will be a period when the Single Farm Payment coupled with the sale of crops and/or livestock will greatly exceed expenditure..... When farmers receive the majority of their income, and with no allowance for the costs incurred earlier in the year, the income will exceed their expenses to such an extent that there may be no entitlement to any Universal Credit. Farm families will have no assurance about whether they will receive Universal Credit at the end of each month which could put them in an extremely difficult financial situation. The change to Universal Credit completely dismisses the pattern of income and expenditure for most self-employed businesses, especially farms. A pattern which farmers do not have the ability to change.”*

A report published by Advice NI, Rural Support and the Ulster Farmers' Union entitled 'Universal Credit in Northern Ireland: Punishing the Self-Employed',<sup>50</sup> highlights worked examples of how the introduction of Universal Credit for the self-employed could prevent these people from meeting basic living expenses. An example for a farming family is detailed below (note that this example is based on 2016 figures).

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<sup>49</sup> <https://www.ufuni.org/move-to-universal-credit-for-farmers-and-other-self-employed-people-a-burden-or-a-benefit/>

<sup>50</sup> Universal Credit in Northern Ireland: Punishing the Self-Employed, Advice NI, Rural Support & the Ulster Farmers' Union, December 2016  
<https://www.adviceni.net/sites/default/files/2021-05/Advice%20NI%20Social%20Policy%20Report.pdf>



## Case Study I: Small Farmer, Ken Higgins

Ken is a beef farmer in Fermanagh. Ken is married with three children, aged 3, 5 and 10. Ken's wife runs the family home and cares for the children. Between September and June, Ken makes nothing; however he takes his produce to auction in July and August, where he makes a total of £5,000. Additionally in October, Ken receives an EU Single Farm Payment of £12,000. Across the whole tax year, after business expenses Ken has a gross earned income of £17,000. After tax and NICs, this is a net earned income of £14,770 for the year.

**Under the current system**, Ken makes an annual declaration of his income for Child Tax Credit (CTC) and Working Tax Credit (WTC). He will receive £170.40 per week in CTC, and £8.48 per week in WTC. (The household is also entitled to Child Benefit of £48.10 per week.) If Ken can equally budget his £14,770 across the year, **Ken's household – including his wife and 3 children – will have a net income of £2,214 per month.**

**Under Universal Credit: Self Employed (UCSE)**, Ken will have to submit monthly, online cash-in cash-out accounts to the Universal Credit system every month. If he fails to do this for any one month, his claim is initially suspended, and then terminated.

Providing Ken does correctly submit his monthly accounts, the household's monthly Universal Credit payment will be calculated as follows:

Couple over 25	£498.89
3 children	£740.42

UC allowance: £1,239.31, minus earnings/presumed earnings ('Minimum Income Floor')

In the months from September to June (excluding October), as stated above, Ken earns nothing: he is farming his produce for sale in the summer months. Due to the Minimum Income Floor, however, he is **presumed** to be earning £1,092 per month. Therefore **from September to June (excluding October), Ken's household – including his wife and 3 children – will have a net income of £147.31 per month.** To re-iterate: for 9 months of the year, the household income for a farming family of 2 parents and 3 children will be under £150 per month. (In July, August and October, the household's "monthly" earnings are so high they receive no Universal Credit whatsoever.)

**Even if Ken and his family equally spread their budget over the year**, and ensure they spread their earnings across the whole year, **their monthly net income will be £1,735.58 – a fall in income of £478 per month.**



The following example from South Tyrone Empowerment Programme (STEP) in Dungannon highlights the issues for farming families, entitlement to UC and help with free school meals and uniform grants:

*A farming couple with 3 school age children were in receipt of Child and Working Tax Credits but had to move to Universal Credit. After two months UC stopped due to surplus earning rules. The issue was the family were due to buy stock for the farm with the earnings but the process was delayed a week meaning the money was in their account during the assessment period. This wiped out their UC award and therefore their entitlement to free school meals and school uniform grants. This was devastating as they needed to invest in the farm to make it sustainable.*

(The STEP adviser noted that this has been the case for many farming families. Some of these families are working other jobs to keep the farm going but the assessment period and reporting for UC is punishing them as it is not a true reflection of annual income. The adviser also noted that accountants are charging for additional work involved in UC and there is no consistency across UC/JBO offices on reporting (what is and is not counted as income). There is a lack of information provided to the self-employed and farming community on the Move to UC who are coming from a Tax Credits system that asked no questions about income or property or even being registered as self-employed).

Advice NI, Rural Support and the UFU propose that self-employed people should receive a fairer and more equitable assessment under Universal Credit. This would help to ensure access to this benefit and the additional passported help which is so needed by these families:

- Actual earnings to be used in the Universal Credit assessment as opposed to the artificial assumed 'minimum income floor';
- The annualised administration of Universal Credit for the self-employed in line with the tax year as opposed to the requirement for monthly reporting of cash-in and cash-out;
- The creation of a dedicated independent support service for the self-employed to assist and support them to navigate Universal Credit.

**The issues outlined in this section of our response must be a serious consideration for the Department as part of this consultation. The result of the issues with Universal Credit for the self-employed may mean that many of these families will have issues with entitlement to Universal Credit and therefore out of access to much needed help with free school meals and school uniform grants.**

### **2.10 Informal Polling with Primary Schools in Fermanagh**

A small-scale questionnaire was issued by the Rural Community Network (RCN) to primary schools in County Fermanagh to determine some of the issues around Free School Meal (FSM) entitlement and showed the following results:

- 14% of respondents felt that families in the school met the criteria for FSM but are not claiming it
- 14% of respondents felt that families in the school might meet the criteria for FSM but are not claiming it
- 29% of respondents felt that the majority of families in their school (50% or more) who are not claiming FSM but who they think meet the criteria have more than two children in the house
- 14% of respondents felt that the majority of families in their school (50% or more) who are not claiming FSM but who they think meet the criteria have a parent or guardian who is self-employed and a further 14% stated yes but they were not sure if it was 50% or more families.

Respondents gave the following reasons why families may not be claiming FSM:

*“Some people do not want to complete online forms and are often unwilling to collect and complete application forms.”*

*“Children with education statements and special needs cannot access FSM because they have no formal diagnosis. The threshold is too low for low income working families and not reflective of the cost of living.”*

*“Possibly because they aren't aware of the income threshold.”*

Respondents also highlighted the following impacts on children from low-income households of not being in receipt of FSM:

*“The children do not always have a hot meal during the day. The free school dinners during term time are a life line for many children as they get a hot meal during the school day which sustains them. Children will also try new foods when they are with their friends. Children from low-income families do not always have access to fresh fruit and vegetables so therefore these foods are not included in the family's diet. Children have an opportunity to taste different varieties of food.”*

*“Impact on concentration and focus and therefore education. Impact on emotions. Paying for meals means less money for other basic needs and causes more issues at home.”*

*“The benefits of a warm dinner cannot be underestimated. Children need conditions for learning, warmth, and not feeling hungry are very important. Having the opportunity to sit with friends and share social aspects of their lives is also essential to create the conditions to learn. For many this hot dinner may be the only healthy meal of the day and so important for health and growth.”*

*“They may not be receiving a fresh hot meal at home so many may go hungry.”*

*“They cannot afford school meals so send a packed lunch which sometimes is not as healthy.”*

*“It is my consideration that all primary school children should receive a free school meal. This guarantees that children have consumed at least one healthy and nutritious meal on a daily basis, which research has proven impacts focus, concentration, energy levels and well-being.”*

*“Children on low-income budgets cannot afford nutritious food, they must buy food according to price. Large supermarkets encourage non-nutritious budget family food offers. There is a huge price disparity in high and low quality food.”*

## **2.11 What Women said about this consultation - Rural Focus Group with NI Rural Women's Network (NIRWN)**

On 30 January 2025 the Women's Regional Consortium held a rural women's focus group with Consortium partners NIRWN on this consultation. During the focus group the options outlined in the consultation were discussed and women gave their feedback on the consultation questions. The results of this discussion are provided here in the form of quotes from the women who attended and relevant quotes are also provided in response to the consultation questions:

*“Lot of incidences where families are missing out and farmers are missing out.”*

*“I know of one farming family where the children went back to school in September and because of changes/fluctuations in the family’s income the children had no school dinners. One of the children is at secondary school and because he had no money for school dinners his friends were giving him money for food to feed him. It wasn’t until half term that they ended up getting FSM.”*

*“Fluctuation in wages is a real issue in rural communities, for farmers, tradesmen, those in seasonal work, building, joinery and childminders. Entitlement to UC runs month to month and the way they claim their expenditure means they can only claim a certain amount not what they actually spend. Entitlement to UC is where the eligibility comes from to lead into FSM so it’s a really important issue.”*

*“There’s one thing about FSM especially in rural areas – there’s a bit of snobbery or embarrassment about it. There’s such a vast array of incomes in schools especially in rural schools and for small schools where people who are getting FSM are nearly looked down upon by other parents/children. That’s a big concern – sometimes people are very much in need of FSM – we talk about the working poor those who are just at the borderline and are paying for everything but get no help – they can be worse off than people who are getting benefits. That’s very hard out there.”*

*“In our primary school the principal keeps saying to apply for FSM – it’s not coming from the school side as it helps the schools as well as they get extra funding. They encourage FSM. A lot of farmers are not applying for it, a lot of self-employed are not applying for it – and maybe some of them don’t know about it. It’s a big issue in the farming community.”*

*“A farmer may know to go to the UFU (Ulster Farmers Union) for a grant for a shed but it when it comes to looking for something for their own house they wouldn’t have a clue – that’s alien to them. They don’t know where to go, they don’t be going into the town to find out about these things, to find these places. They talk about Make the Call but for a lot of houses it hasn’t filtered out especially in rural areas they’re not in the know. If you live in the town and live in developments there’s more talk among the neighbours but farmers are not going to talk about something like that.”*

*“I don’t think farmers are aware that if they were turned down when they applied for UC that they can reapply if their income levels go down. Farmers tend to have more income in the summertime and don’t have entitlement to UC. In Winter when their income is lower they may have entitlement and can reapply. It’s not advertised and all swept under the rug with no real discussion about it. Once farmers get two to three months of zero entitlement they’re coming off UC and they think what’s the point of reapplying, it’s so onerous to report monthly for zero entitlement but they can reapply more easily within six months.”*

*“In terms of where these families can go for help I would say local independent advice, it’s a bit more tailored, for example Community Advice Fermanagh. They know the complexities of living in Fermanagh. If you ring the centralised advice orgs*

*like Make the Call they can answer the questions, they're very good to a certain point but when it comes to the rural complexities you need that face-to-face advice. They need to explore more outreach at marts, GPs, shows, etc."*

*"Young children are like sponges, taking in a lot of information and learning when they are young. If they're not fed properly from they leave the house, if they're not getting nourishing food, they are not going to maintain the same level of education that they could if they had a good meal every day."*

*"Lots of habits are formed in younger years through being exposed to vegetables."*

## **2.12 Format of the Consultation**

We have concerns about the online option for completing this consultation and that this has been prioritised as a way to respond. The online format limits people to a series of options determined by the Department without the chance to provide further detail on why this option may have been chosen or to provide any alternatives. As WRDA guidance on public consultations<sup>51</sup> states: *"the binary 'agree/disagree' nature of many questions hides the complexity of how people feel about different issues."* The answers to these 'agree/disagree' questions needs careful analysis alongside the reasons for why these answers have been chosen yet for many of the questions in the consultation there is no facility to provide this additional information. Respondents may select one of these options but may have several qualifications to their answer and if these are not addressed their answer may be different.

Where there is the facility to provide more information (Questions 1, 5 and 6 only) there is only space to provide 150 characters. This simply does not allow respondents to explain their choice in any meaningful way.

The Women's Regional Consortium is concerned that the results from the 'agree/disagree' questions could be presented in such a way that they paint a misleading picture of people's views as they are unable to provide any further information.

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<sup>51</sup> Women at the Heart of Public Consultation, A guide for Public Authorities and Women's Organisations, WRDA, November 2017  
[https://wrda.net/wpcontent/uploads/2018/10/WRDA\\_WomenAtTheHeartOfPublicConsultation.pdf](https://wrda.net/wpcontent/uploads/2018/10/WRDA_WomenAtTheHeartOfPublicConsultation.pdf)

### *Timescale to Respond*

The final date for responses to this consultation is 14<sup>th</sup> February 2025. While on the face of it, it looks like this gives respondents 12 weeks to respond to this consultation this is not the case. This consultation was published on the website on the 22 November 2024 and ran over the Christmas holiday period. In effect, respondents had less than 12 weeks to respond and allowances must be made for holiday periods. In order to enable genuine and meaningful consultation the consultation timeframe should be at least 12 weeks.

As the Women's Regional Consortium we want to ensure that women from the most disadvantaged and rural areas of Northern Ireland are given the chance to share their valuable experiences and opinions to help influence and shape the actions of Government. A shorter consultation timeframe severely limits the opportunities to organise engagement with local groups to explain the contents of the consultation, facilitate discussion and meaningfully collect the views of those impacted by its contents. It means that organisations like ourselves have insufficient time to properly consult with affected women so that their views/experiences which are so critical remain outside the process. They should be given the time and space to discuss these issues in a format that they can understand and in ways where they feel comfortable and empowered to contribute.

This consultation was published alongside a number of other Government consultations which also require detailed responses by the Community and Voluntary sector. The volume of consultations continues to put huge pressure on an already overstretched and under-resourced sector who are facing significant challenges due to funding cuts, insecure contracts and increased demand for our services.

We refer the Department to the guidance on consulting with women produced by Women's Regional Consortium members WRDA.<sup>52</sup> This guidance contains five top tips based on the many years of experience that women's groups have in promoting women's participation in public policy making. These include the need to work

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<sup>52</sup> Women at the Heart of Public Consultation, A guide for Public Authorities and Women's Organisations, WRDA, November 2017  
[https://wrda.net/wpcontent/uploads/2018/10/WRDA\\_WomenAtTheHeartOfPublicConsultation.pdf](https://wrda.net/wpcontent/uploads/2018/10/WRDA_WomenAtTheHeartOfPublicConsultation.pdf)

together with the women's community and voluntary sector, making time for accessible face to face engagement, keeping language accessible and relevant, listening to the stories from women and making women visible in the product as well as the process.



### 3.0 Specific Questions

**Are you responding as:**

- An individual
- On behalf of an organisation

**If you are responding on behalf of an organisation please provide the name of the organisation**

**Organisation:**

Women's Regional Consortium

**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 (Please specify below)

If you answered "No" to this question, please tell us how you think the eligibility criteria should be changed. Please DO NOT include any personal information in the text box below.

Please refer to Section 2.12 of our response – we do not agree that there should be a character limit to providing additional information for this question in the online survey. Providing 150 characters simply does not allow for any useful explanation.

We believe that the eligibility criteria must change to enable more families to receive this important help. The case for bringing more families into entitlement is clear given the impact of rising costs for the essentials and with growing rates of poverty in Northern Ireland particularly for children. As the consultation states "*The Department's modelling shows that if the current eligibility criteria remain unchanged, the number of full-time pupils entitled to FSM and UG is likely to fall by 5% to 88,700 in 2025/26.*" Therefore, taking no action will result in even fewer pupils being able to

access help at a time when there is increasing need for financial help for low-income families and children.

If Universal Credit is to be used as the main passporting benefit to qualify (given the Move to UC) there must be some acknowledgement of the difficulties that some families experience in accessing UC. As we have previously stated moving to UC often has negative implications for self-employed people who don't have a regular income each month and it applies a Minimum Income Floor which also punishes the self-employed. This is particularly the case for those living in rural areas who are more likely to be self-employed including farming families. This has not been identified in the Rural Needs Impact Assessment carried out for this consultation. The Rural Needs Impact Assessment does not make reference to this issue nor does it include research which was carried out by NISRA<sup>53</sup> in relation to this. Without a change to the eligibility criteria that specifically addresses this issue for the self-employed will see many families who need this help excluded from it. We refer the Department to Sections 2.9, 2.10 and 2.11 of this response.

**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

Please see Section 2.12 of our response. We disagree with the way this question is worded and that is why we have chosen the option neither agree nor disagree. For

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<sup>53</sup> Move to Universal Credit (UC) Tax Credit Non-Movers Research, NISRA, 2024  
<https://www.communities-ni.gov.uk/system/files/2024-12/dfc-move-to-uc-tax-credit-non-movers-research-report.pdf>

those who will complete this survey online there is no option to provide additional information. This means that online respondents are being forced to choose only options proposed by the Department without the ability to qualify their reasoning for this.

The feedback we received from discussing this question with women at a focus group session highlights how the narrowness of this question and the options provided online don't allow them to reflect their views properly.

The women who attended the focus group session really wanted to see universal FSM for all pupils and that is the preferred outcome. However, some suggested that if this was not possible that they would agree with prioritising younger pupils but reluctantly as they felt that providing FSM for younger pupils should be the very least that Government should do. The women made the point that providing FSM for all pupils helps with addressing stigma around FSM and this was particularly important for older pupils where the stigma can be worse.

The women discussed how children have developmental needs in their younger years and beyond right through secondary school and that FSM was important to address these needs. They also felt that the provision of FSM is important in addressing wider health issues including healthy eating and obesity and would provide a way to control the long-term health outcomes for children and young people.

The women discussed the issues they faced in their homes with trying to juggle the provision of healthy meals with the pressures of work and changing patterns of work. Changing employment patterns including shift working and working outside office hours puts more pressure on parents to try and provide healthy meals for their children when they are not at home at dinner time or are getting home late and having to start into meal preparation. Providing FSM during the school day would relieve some of this stress and pressure from parents, particularly from women who due to gendered expectations are so often expected to provide meals for children.

Providing universal FSM would also help with the costs experienced by parents including parents who are working, not entitled to any help and who are struggling on relatively low incomes to meet the costs of both food and school uniforms.

*“At the very least that’s what they should do [provide FSM to younger pupils].”*

*“Talking about stigma – it only gets worse with older pupils. At the very least we should be aligned with other countries if not secondary schools as well.”*

*“I don’t necessarily agree that younger children should be prioritised at the expense of the older pupils but it’s the very least that should be done to provide younger children with FSM.”*

*“There are the long-term outcomes to consider in terms of balanced meals, obesity levels. If they were getting good food over their school days you would have better control over long term health outcomes for children and young people.”*

*“Myself and my husband both work shifts and the children go to after schools. My oldest is in P1. We’re giving them lunches. When I get home at night I might not get home until 6 or 7pm to start cooking. If I knew she had a good healthy meal at school I would feel less guilty and much better about her nutrition.”*

*“Universal FSM would help massively – if she had a good nutritious and quite substantial dinner in school and by the time she gets home she just needs a supper that would be good. If there was a healthy option in school it would relieve a lot of issues for us as parents. Especially if struggling with different working patterns.”*

*“I would like to see FSM for all pupils. There’s so much in terms of developmental changes at all ages, I think to give older ones less is not OK. I think they all deserve FSM.”*

*“I have children from P1 up to Year 10. My 14-year-old cleans out my fridge on a daily basis after dinner. I find it quite a struggle. We’re not entitled to anything, the cost is extremely difficult. My kids see others getting FSM in school and they’re asking why can’t we get them – they feel left out. I do try but it’s really hard when you can’t get them a hot meal at school. To know they could avail of a free dinner in school would be good reassurance that they’re getting something decent. Where I’m not constantly thinking how many times have we had chips this week or have they had enough veg today. That there’s someone else helping to take the pressure off parents.”*

*“I go out to placement in the evenings or I’m out delivering training. Monday night I wasn’t home until after 10pm and tonight I’m not home until after 10. It’s a struggle. When you work shifts it’s difficult, you’re trying to do your best but it’s hard. I would like to see FSM for all because of the developmental changes they all go through right into their teenage years. I would like to see it for all.”*

*“If they can’t do FSM for all even if they could introduce some kind of help up to age 16 – could they have bands or something – from 12-14 where even a little help is provided like a minimum that could be done?”*

**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

Please see Section 2.12 of our response. For those who will complete this survey online there is no option to provide additional information. This means that online respondents are being forced to choose only options proposed by the Department without the ability to qualify their reasoning for this.

It is clear from our discussions with local women that they strongly agreed that increasing FSM provision should be a priority for the Department. The point was made that this is an investment in our future and that children should be the priority for this investment. Page 11 of the consultation document outlines the advantages of universal FSM provision for children and families helping to address poverty, improving children’s ability to learn/educational attainment and significant benefits for children’s physical and mental health. It is therefore good use of public money to invest in FSM provision with considerable benefits for children and families as well as longer term outcomes in terms of the benefits to the economy and savings to the health service as a result of healthier eating habits.

*“I think it should be a high priority to increase the number of children able to get FSM. Who would answer otherwise?”*

*“It should be a high priority, budgets are always tight but whenever they need the money they can always find it. When you’re thinking about our kids/future generations it should be where the money is going – it should be a priority.”*

*“It’s our responsibility at the end of the day they can’t make decisions for themselves. We keep telling our children how much they matter. Well then Government need to show that too instead of going you don’t really matter that much our pay increases matter more. The children should absolutely be the priority.”*

**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

Please see Section 2.12 of our response. For those who will complete this survey online there is no option to provide additional information. This means that online respondents are being forced to choose only options proposed by the Department without the ability to qualify their reasoning for this.

We found the wording of this question problematic as it is pitting means-testing against universal provision and also pitting poverty against the well understood health and educational benefits of universal provision. This makes this question very difficult to answer and even more so as there is not facility for further clarification in the online survey which is especially dangerous. We have concerns therefore about relying solely on the results of the answers to the check boxes for this question. In the focus group discussion some women felt that there needed to be some help for families who are working and who have no entitlement to any form of help but are struggling to meet these costs. Others understood that allowing more low-income

families to receive FSM such as those on benefits meant that money is targeted to where there are the worst health outcomes. However, to reiterate women were clear that the ideal situation would be for universal FSM provision for all school pupils given the educational and health benefits.

We also support the following recommendation from our colleagues in UNISON that the Department should *“ensure robust monitoring of the provision of any of the options for universal provision of free school meals when implemented, with a view to evidencing their effectiveness in improving outcomes for children and young people and their families in relation to their health and wellbeing, learning outcomes and in addressing poverty. In the event that this consultation process results in the roll out of a universal offering to a limited number of year groups, it is important the department ensure evaluation of its impact and capacity for delivery with an eye to incrementally increasing the number of year groups eligible for universal free school meals.”*

*“It think it’s unfair to just base entitlement on benefits. People who are on a low income but just over the threshold find it very difficult to pay for anything but yet they don’t qualify for benefits. These people are lost in the middle of all this.”*

*“You’re either well enough off to be able to pay or you’re on benefits – but people who are working but their income is not that high but they’re over the – the working poor.”*

*“Me and my husband both work shifts and our childcare bill last year was £1400/month. It’s gone down to £800/month this year which is still a lot. We are entitled to absolutely nothing. If I knew the kids were going into school and getting a FSM that would alleviate so much of the cost in this house. It needs to be an entitlement across the board at the very least for younger children but I 100% agree that it should be across the board for all kids for developmental reasons as well as health reasons. I don’t agree that it should just be going to low-income families on benefits.”*

*“People on benefits are those with the worst health outcomes and that’s why they need it more. Everybody needs help now. I have 3 kids and my dad does our childcare as we can’t afford any childcare. If he wasn’t there I’d have to quit my job and sell my house and get a smaller mortgage. The health outcomes are worse for lower income families on benefits that’s the justification for targeting it there. But the money needs to be found - if you only have a certain pot more of it has to go to the people with the worst health outcomes. More money is needed to provide it to everyone that’s the answer!”*

**Question 5 - If it were decided that the only change were to rollout a form of universal FSM, which of the following groups of pupils is 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 (please specify)

**If you answered “Other” to this question, please tell us which year groups you think should receive universal FSM. Please DO NOT include any personal information in the text box below:**

Please refer to Section 2.12 of our response – we do not agree that there should be a character limit to providing additional information for this question in the online survey. Providing 150 characters simply does not allow for any useful explanation. As previously stated we would like to see universal FSM for all pupils given the positive health and educational outcomes. However, we are concerned that the options outlined in this question do not change the eligibility criteria and this would make no difference to those who would be eligible for the Uniform Grant. We do not find that issues around Uniform Grant eligibility are given enough focus in this consultation which could again lead to confusion. There are no specific questions around Uniform Grant eligibility and we believe that respondents do not have the ability to raise this issue especially in the online survey.

There are considerable issues with the cost of school uniforms in Northern Ireland (see Section 2.7 of this response) something which the Women’s Regional Consortium raised in our consultation response to the Department’s School Uniform Policy Consultation.<sup>54</sup>

We know from our research work with local women that the costs of school uniforms is an annual dread contributing to significant levels of anxiety and financial hardship

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<sup>54</sup> <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/09/Womens-Regional-Consortium-Response-to-School-Uniform-Policy-Consultation.pdf>



for many women. Our research on the impact of the Cost-of-Living Crisis<sup>55</sup> shows how much school costs, including the cost of school uniforms, impact on the lives of women and families. We believe that it is often more likely to be women who are bearing these financial costs and we heard examples of women going without essentials such as food and heating to pay for school uniforms.

Given widespread price increases for the essentials including clothing, cuts to important areas of help including the Holiday Hunger Scheme and inadequate support through the social security benefits system it is clear that the current levels of support through the School Uniform Grant are insufficient. **There is a clear need to change the eligibility criteria so that more families can access help with the costs of school uniforms.**

*“The best outcome is that everyone gets FSM right through until they are finished education but I don’t know how realistic that is with the funding.”*

*“Universal FSM should be provided across the board but at the very least younger pupils should have FSM at least to P3 if not to P7. In an ideal world it should be for all pupils at all schools and include playgroups as well.”*

*“Even though the price of schools meals have not gone up the cost of school uniform has gone up massively, school fees have gone up. We have 4 children in primary school and one in secondary school so we’re paying for it in other ways.”*

**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)

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<sup>55</sup> <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/09/Cost-of-Education-Summary-from-Women-Cost-of-Living-Research.pdf>

**If you answered “Other” to this question, please tell us which year groups you think should receive universal FSM. Please DO NOT include any personal information in the text box below.**

Please refer to Section 2.12 of our response – we do not agree that there should be a character limit to providing additional information for this question in the online survey. Providing 150 characters simply does not allow for any useful explanation.

It is our preferred option that universal FSM is rolled out to all school pupils up to Year 14. At the very minimum if this is not possible then we would like to see universal FSM for pupils at primary school from nursery to P7. Regardless of which option and following on from our answer to Question 5 we want to see a change to the eligibility criteria for all pupils to ensure that more families are able to access school uniform grants. The women we spoke to at the focus group were clear that the provision of FSM and uniform grants needed to be a priority for the Department and they should seek to provide funding to enable as many pupils as possible, ideally to Year14, to have universal FSM. In addition, changes should be made to the income threshold to ensure that more low-income families, including the working poor, are able to access school uniform grants.

*“Ideally up to P7 but if it’s not an option to extend FSM to secondary school then there should be some sort of subsidy where a monthly percentage of it is paid for – could they even at least get some additional support with meals like 50% for example?”*

*“They [Stormont] can find the money when they need to but this is something that all children should be entitled to. They will find the money when they need to. We need to say this is what we want, what we need and they need to find the money for it.”*

*“Families are struggling and more are struggling in NI because of inflation. People are finding it more and more difficult so we need to say this is what we want and it’s up to them to find the funding for it.”*

*“My preference is for FSM for all – it takes the stigma out of it – by providing universally it removes that.”*

**The Department may wish to use some of the comments that you may have made in their findings of this review. Please tick the box below if you do not wish for your comments to be included.**

- I do not wish for any comments that I have made to be included in any Departmental reports