

# Revised eligibility criteria for free school meals in Wales due to the rollout of Universal Credit

## Consultation response form

Your name: Steffan Evans

Organisation (if applicable): Bevan Foundation

e-mail/telephone number:  
steffan.evans@bevanfoundation.org

Your address:  
Bevan Foundation  
145a High Street  
Merthyr Tydfil  
CF47 8DP

Responses should be returned by **14 September 2018** to

Pupil Wellbeing Branch  
Support for Learners Division  
The Education Directorate  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

or completed electronically and sent to:

e-mail: [FreeSchoolMealsConsultation@gov.wales](mailto:FreeSchoolMealsConsultation@gov.wales)

**Question 1(a)** – We are proposing a net earnings threshold of £7,400 per annum to determine eligibility for free school meals under Universal Credit. We should have a net earnings threshold. Do you:

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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**Question 1(b)** – The net earnings threshold of £7,400 per annum is appropriate. Do you:

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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**Question 1(c)** – Is there anything else we need to take into account in setting the earned income threshold, which has not been covered in the consultation document?

### Supporting comments

As set out in section 2 of our attached paper, the Bevan Foundation strongly disagrees with the Welsh Government’s proposals to introduce a net earnings threshold of £7,400 per annum to determine eligibility for free school meals under Universal Credit. We believe that the proposals do not adequately meet the needs of children, living in poverty in Wales.

55,000 children, living in relative income poverty in Wales will not be eligible for a free school meal under the policy. With 24% of Welsh children who were eligible for a free school meal not taking up the option at the last school census, partly as a result of stigma, over half of children, living in relative income poverty could be left without a free school meal in Wales.

A further issue highlighted by section 2 of our paper is that the proposed threshold only looks at a family’s income without consideration for their family circumstance. For example, household with two adults and one child does not require as a large an income as a family with two adults and three children. By setting a cap that only considers earned income, the Welsh Government’s approach risks exacerbating poverty in larger families, a group that are already at greater risk of living in poverty.

**Question 2(a)** – Pupils who are eligible at the point the threshold is introduced in January 2019, and new claimants under the threshold who gain FSM during the rollout of UC, should have their entitlement to FSM protected. Do you:

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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**Question 2(b)** – Is there anything else we need to take into account in terms of protecting families affected by the change, which has not been covered in the consultation document?

### Supporting comments

As set out in section 3 of our paper, it is beyond question that healthy and balanced diets have long term benefits for children. A nutritious diet in childhood can boost a child’s educational attainment and prevent both short term and long-term ill health.

These benefits are particularly pronounced for children living in poverty, however, with section 4(i) of our paper highlighting how there are clear links between poverty and poor diet.

The provision of free school meals does not only benefit children living in relative income poverty, but, it can also impact on the rest of their families. We draw attention in section 4(ii) of our paper to research undertaken by the Children's Society that suggests that a free school meal is worth £334 a year, per child to a family. With 1 in 5 UK parents skipping meals during school holidays, the impact of this saving for those on relative low incomes should not be underestimated.

Finally, we believe that there is a risk that the Welsh Government's policy could disincentivise parents from entering the labour market or increasing their working hours. Given the clear links between work and poverty, as set out in 4(iii) we believe that the introduction of any cap that would disincentivise work would be a negative development.

**Question 3** – Do you think there is anything else we need to take into account, which has not been covered in the consultation document?

### Supporting comments

As set out in Parts 5 and 6 of our response, we believe that the time is now right for the Welsh Government to undertake a broader review into child nutrition in Wales. We believe that the Welsh Government should, as a medium-term policy objective, consider introducing universal free school meals in Wales. Such an approach would ensure that no child in Wales, living in poverty, would be ineligible for free school meals, whilst also removing the stigma surrounding the benefit.

In the short term, we believe that the Welsh Government should consider providing free school meals to all school children below year 2, as is currently the case in England and Scotland. Adopting this approach would ensure that no child in Wales is at a disadvantage when compared with children in England and Scotland.

**Question 4** – We would like to know your views on the effects that amending the eligibility criteria for free school meals would have on the Welsh language, specifically on:

- i) opportunities for people to use Welsh
- ii) treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

### Supporting comments

As stated, we believe that the proposed policy falls short of meeting the needs of children, living in relative income poverty in Wales. This would impact negatively on children in both Welsh medium education and in non-Welsh medium education. We do not believe that the policy would treat the Welsh language less favourably than the English language, however.

**Question 5** – Please also explain how you believe the proposed policy amending the eligibility criteria for free school meals could be formulated or changed so as to have:

- i) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language
- ii) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

**Supporting comments**

**Question 6** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

For our full response, please view the paper attached.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: