

# Back to school?

Local variations in help  
with costs of school meals  
and uniforms.

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FOUNDATION

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Our vision is for Wales to be a nation where everyone has a decent standard of living, a healthy and fulfilled life, and a voice in the decisions that affect them.

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## Acknowledgements

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## Summary

The Welsh Government provides vital support to children and young people from low income families with the costs of attending school. Two key schemes are Free School Meals (FSM) and the Pupil Development Grant – Access (PDG – Access). These schemes are administered by local authorities on behalf of the Welsh Government.

As part of a larger project on help for low-income families, we reviewed how local authorities operate the schemes. We found some examples of good practice as well as a number of examples where there was scope to strengthen administration.

In these authorities, families who are trapped in poverty face great difficulty accessing the support that they are entitled to. We therefore call for consistent high standards across Welsh local government to ensure that:

- All support under PDG – Access is provided in advance, not in arrears, and without proof of payment.
- Any schools administering schemes do so professionally and consistently, without stigma or additional requirements, and are available during school holidays.
- Families receiving help with housing costs or council tax reduction, or which apply for either FSM or PDG-access, are auto-enrolled into both schemes.
- Online information is up to date and correct.
- Families have a choice of channels with which to apply, including online.
- Telephone systems are easy to navigate and calls are answered promptly.

## 1. Introduction

Poverty is a significant problem in Wales, 730,000 people, nearly a quarter of the population live in relative income poverty.<sup>1</sup> Despite various policy initiatives the problem has worsened over recent years with approximately 40,000 more people living in poverty in 2015-16 to 2017-18 than in 2007-08 to 2009-10.<sup>2</sup>

Poverty has a devastating impact on the lives of families trapped in it. Those living in poverty suffer poorer health throughout their lives, face a higher risk of living in poor quality housing, and children living in poverty face a greater risk of low attainment at school. Poverty also has an impact on Welsh society more generally with the Joseph Rowntree Foundation (JRF) estimating in 2016 that poverty is linked to additional public spending of around £3.6 billion in Wales.<sup>3</sup> We believe that solving poverty should be a clear priority for all tiers of government in Wales.

There are three key drivers of poverty in Wales:

1. Work not providing workers with enough income to enjoy a decent standard of living.
2. The social security system not providing families with enough support.
3. High costs of living, especially housing costs.

Whilst not all policy levers necessary to solve poverty have been devolved to Wales, the Welsh Government and Welsh local authorities have significant powers that, if used effectively, could reduce the impact of poverty on the lives of low-income families.

Earlier this year, the Bevan Foundation started work on a new project that sought to find ways that the Welsh Government and Welsh local authorities could ensure that low income families receive more effective support through the social security system. Whilst powers over social security per se have not been devolved to Wales, the Welsh Government and Welsh local authorities have developed a number of support schemes to assist families living in poverty. These are designed to supplement the support families receive through the social security system as provided by the UK Government, forming a “Welsh safety net”.

To kickstart the project, we have primarily focused on the support schemes that are available to assist low income families with the cost of raising children. The recent publication of the Children’s Commissioner’s *Charter for Change* highlighted the devastating impact that poverty has on the lives of children across the nation.<sup>4</sup> The report drew attention to some of the shortcomings of existing support schemes, for example, highlighting that many families who are struggling to meet the cost of the school day are not receiving support as they are not deemed to be poor enough to be eligible for assistance.<sup>5</sup>

Through our project we hope to improve understanding of how each support schemes operate in Wales, considering both their strengths and weakness. We will publish a full report on these schemes in the context of children and education later in the autumn setting out our findings and recommendations for reform. In the interim we have made some preliminary findings that we share in this short report. This report focuses on our preliminary findings with regards to the operation of two support schemes:

- Free School Meals
- The Pupil Development Grant – Access

The overall policy direction for these schemes is set by the Welsh Government, but it is local authorities who are responsible for their administration. Through our research we have

uncovered evidence that local authorities are taking very different approaches to this. Whilst we have found some excellent examples of local authorities tailoring the way that support schemes are administered to meet the needs of their communities, we have found evidence that others are falling short. This report sets out to highlight these examples of best practice to encourage other local authorities to consider whether they could be implemented in their areas, and to shine a light on those practices that we believe should come to an end immediately, to ensure that all families living in poverty receive the support they are entitled to in the best way possible.

This report focuses on three key areas:

1. The application process
2. The way support is provided
3. The accuracy and availability of information

It is within these areas that we have found the greatest variation between local authorities that are leading the way and those who are lagging behind.

## 2. Background and research methods

Free School Meals (FSM) and the Pupil Development Grant – Access (PDG – Access) are both forms of support designed to assist low income households with the cost of sending their children to school. The Welsh Government’s FSM policy provides children from low-income families with a free school lunch during term time. PDG – Access on the other hand, provides children from low-income families with £125 in financial support (£200 if the child is entering year 7), either by way of cash or vouchers, to buy school uniform, equipment, sports kit and kit for activities outside of school.<sup>6</sup>

The eligibility criteria for both support schemes are very similar. A child is eligible to receive FSM if they attend a maintained school and one of their parents receives one of a series of means tested legacy benefits,<sup>7</sup> or if they receive Universal Credit provided the household has an annualised net earned income of no more than £7,400 or £616.77 a month (as assessed by earnings from up to three of their most recent assessment periods).<sup>8</sup> The eligibility criteria for PDG – Access on the other hand are near identical but families are only eligible for support if their child is entering Reception, Year 3, Year 7 and Year 10.

The research for this report was carried out over the weeks of 12<sup>th</sup> and 19<sup>th</sup> August 2019. During these weeks we examined every local authority website for information on what support families would receive under FSM and PDG – Access in each local authority and how that support would be provided. Where all the relevant information was not available online, we contacted local authorities by phone, following up through email if requested to do so. Through this we have managed to build a full picture of how families are required to apply for support and how this is provided in 16 local authorities, and a near-full picture in a further 6.<sup>9</sup> It is important to note, however, that we did not complete the application process at any of the local authorities, therefore this report does not provide comment on the actual experience of applying for support.

### 3. Applying for support

An aspect of FSM and PDG – Access administration that varies widely across local authorities is how families apply. There are two primary questions that this section seeks to address, both of which will be discussed separately:

1. Are families required to submit multiple application for FSM and PDG – Access?
2. Can families apply for support online?

#### Multiple applications

Whilst attempts are made to encourage parents to apply for support across all local authorities there are three broad approaches taken at present to the application process itself:

1. Families eligible for FSM and PDG – Access must submit separate application forms to receive each support schemes.
2. Families eligible for FSM and PDG – Access must submit an application to the local authority to receive support through either scheme, but there is no need for families to submit two separate forms. Families are either provided with the opportunity to apply for both on the one application form, or families who apply to receive one of the support schemes automatically receive the other if they are eligible.
3. Families who receive housing benefit or the council tax reduction are automatically registered for FSM and PDG – Access if they have children of an eligible age. Families who are not automatically enrolled are still provided with an opportunity to apply for FSM and PDG – Access in the authorities that operate this system.

The third approach is the approach that we believe local authorities should be aiming to emulate. This is consistent with the calls made by the Children’s Commissioner in her *Charter for Change*, which called on the Welsh Government and local authorities to work together to establish an auto-enrolment system for FSM and PDG-Access.<sup>10</sup>

Auto-enrolment has a number of benefits. It reduces the number of times a low-income family needs to contact their local authority to register for support, reducing the risk of them missing out on assistance they are entitled to. It also reduces the administrative burden on local authorities, freeing up staff to undertake other activities. We believe it is important, however, to ensure that families are still provided with a mechanism to apply for FSM and PDG – Access to ensure that those families eligible for support but who fall through the cracks in such a system can still receive help.

We believe that no local authority should require families to submit multiple, separate applications. Low income families living in local authorities which adopt this approach face a significant additional burden compared to those elsewhere, and the approach also increases the risk of families missing out on the support they are entitled to.

Perhaps of greatest concern, we have found evidence that there are some local authorities that require families to submit a new application for FSM at the start of every school year. This places a needless burden on families given that, as a result of transitional protections introduced when the eligibility criteria for FSM were amended in April 2019, a child who becomes eligible for FSM between 1 April 2019 and 31 December 2023, will have their FSM protected until 31 December 2023, even if their circumstances change and they no longer meet the eligibility criteria.<sup>11</sup>

### A digital option

Another aspect of the application process which differs between local authorities is the ability for families to apply for support online. Whilst it is now possible for families in most local authority areas to apply for FSM and PDG – Access online, either by using an online application portal or through emailing a copy of their application to the local authority, this is still not an option in all areas. We believe that these local authorities should update their approach immediately to ensure that families are given the opportunity to apply for support online, if this is their preference, wherever in Wales they may live.

It is also important that local authorities retain the option of allowing families to apply for support through others means, including on paper, and ensure that there is assistance available via telephone or in person for families who are having difficulties completing the application process. Online-only applications risks excluding people unable to use online services e.g. families in rural areas where there is poor internet connectivity, families that do not have digital skills for example due to a disability and families who are unable to afford a PC and internet connection.

### Additional support

We identified that some local authorities provide extra support towards the cost of school uniform. There are slight variations between each scheme, but they do share some characteristics. The schemes primarily provide support for children attending secondary school in year groups where PDG – Access is not available. The eligibility criteria for these additional schemes are also similar with the support being available for children who receive FSM.

This additional local provision is welcome and illustrates the positive aspects of local administration.

## 4. The way support is provided

There are important variations between how each local authority provides support under both PDG – Access and FSM. Whilst the eligibility criteria for both schemes are similar, the different form of support they provide mean that they will be considered separately in this section.

### PDG – Access

Families eligible for PDG – Access are entitled to £125 worth of support towards the cost of their child's school uniform and towards the cost of equipment and clothing for PE and extra-curricular activities as their child enters Reception, Year 3 and Year 10, and £200 worth as their child enters Year 7. It is up to each local authority however, to distribute these funds to families. There are some significant differences as to how this is done.

The vast majority of local authorities provide families with the support that they are eligible for under PDG – Access as cash payments in advance. These payments are usually made via BACS, but local authorities also provide cheques where this is required.

This approach ensures that families receive cash help in advance of purchasing school uniform and other equipment. They can spend the money purchasing items at the outlet of their choice, or indeed can spend it on other things. However, we noted that if a family is in debt or arrears, the PDG-Access funds paid via BACS could be swallowed up by an overdraft and so would not be available for the purchase of school equipment.

A very small number of local authorities provide families with support in arrears. These authorities take slightly different approaches. One authority requires families to submit receipts, evidencing that they have spent their money on eligible items before they can receive PDG – Access funds. The authority does permit parents to submit multiple claims however, to spread the cost. Another local authority makes a full cash payment to families who have successfully applied for PDG – Access through BACS or cheque, but does not open the application window for the 2019/20 school year until the September 4<sup>th</sup> 2019, i.e. after the start of the school term.

Requiring proof of expenditure and payment in arrears impose financial and administrative burdens on parents as well as being an inefficient use of local authority resources. Payment in arrears risks families facing real hardship having to purchase uniforms ahead of being reimbursed, and some may end up in debt through doing so. Requiring proof of expenditure also increases the burden on families who spread the cost of uniform purchase over several months, with multiple claims having to be made and risks of receipts being lost. There is also the stigma of claiming this way. There are many benefits for specific purposes with much higher cash values which do not require proof of expenditure, such as Winter Fuel Allowance and Attendance Allowance, and we do not see that PDG – Access is any different. We recommend that these authorities should immediately change their approach to providing cash payments in advance, without requiring proof of purchase.

A final variation we have noted is with regards to who provides families with support. In the majority of local authorities, the payments are made directly by the authority itself, but some have transferred responsibility to schools. Whilst schools have an important role to play in promoting awareness of FSM and PDG – Access, we are concerned that schools may not have the expertise to process applications, that they may link the availability of help with the purchase of high-cost uniforms through a preferred supplier, the loss of confidentiality for

parents, the closure of schools in the holidays when parents may wish to apply, and the fragmentation of the PDG – Access scheme.

## Free School Meals

Children who are eligible for Free School Meals (FSM) are entitled to receive a free school lunch during term time.<sup>12</sup> Traditionally there has been a division between how children are provided with this meal in primary and secondary schools. In primary schools, payments have traditionally been made by parents directly to the school with children who receive FSM and those whose families pay for their meals being provided with lunch. In secondary schools, pupils have traditionally been presented with more choice with pupils paying for their meals at lunchtime either through a biometric system or through a card system. Pupils or parents can top up the amount of money on their account, with pupils in receipt of FSM being provided with a daily allowance by the local authority. There are many primary schools now also moving towards this model. Given that there is no legal definition of what this allowance should constitute,<sup>13</sup> it is up to each local authority to develop its own approach. This has led to some considerable differences across Wales.

There are two broad approaches taken by local authorities when providing children in receipt of FSM with an allowance. The first approach is to let each school decide the level the allowance should be set at. The second is to adopt an authority-wide allowance, with some differentiating between children in primary school and secondary school. The second approach is the most common approach.

The lunch allowance differs significantly between local authorities, ranging from £2.30 a day to £2.95. Each local authority aims to set its allowance at a level that allows every child in receipt of FSM to afford a main meal and a drink. The smaller allowance in some local authority areas *may* therefore reflect the fact that the cost of school meals in those authorities is lower than elsewhere. If this is the case this would have significant implications for families living in poverty but whose income is not low enough to qualify for FSM. A low-income family living in an area with high-cost school meals would, over the course of the year, be substantially out of pocket compared to a family living in an area with lower-cost meals. Alternatively, it may be that the allowance provided to FSM pupils in some local authorities may not be enough to buy a meal and drink. We will explore this in greater detail in our autumn report.

## 5. Accuracy and availability of information and support

We found that local authorities vary greatly on the availability and accuracy of support and information on FSM and PDG – Access. All local authorities provide information and support on FSM and PDG – Access through a variety of channels including their websites, by telephone, through schools and many more. We have found examples of excellent practice and some other examples that fall short of the standards we would expect.

One area where the variable performance of local authorities can be illustrated most clearly is with regards to the information that is available online. Having examined the websites of all local authorities we found some to be excellent, with clear, understandable information provided on the support available, the eligibility criteria for each scheme, and how to apply for help. Some websites provided information on both FSM and PDG – Access on the one page or provided easy to identify links to find more information about the other scheme. This picture was not universal, however.

The information available online is not accurate in all local authorities. For example, the downloadable application form for FSM and PDG – Access at one local authority erroneously stated that only children entering Reception and Year 7 are eligible for PDG – Access. Furthermore, we found that not all local authorities clearly communicated with families that if they were eligible for FSM, they could also be eligible for PDG-Access, or vice versa, on their websites. And in two cases the link to the local authority web page from the Welsh Government's page on PDG – Access was broken. We cannot see any justification for these weaknesses and that local authorities should immediately seek to remedy these.

We also found that the experience of contacting local authorities by phone was very different. Whilst a number of local authorities answered our calls swiftly, we had to wait in excess of 10 minutes to speak to a person at others. On the whole, we found that our queries were dealt with more swiftly when local authorities provided a direct line number for the relevant team on their website as opposed to having to contact the switchboard or navigate the automated telephone system. At one local authority, having tried to navigate our way through the phone system we were informed that we had reached the wrong department. But instead of connecting us to the right team or providing us with a direct line number, we were fed back into the system and had to start the process all over again. At another local authority we were swiftly put through to the right department on August 15<sup>th</sup> only to be told that both members of staff who could assist us with a PDG – Access query were away on leave. Given that most parents tend to buy for their school uniform over the summer, having no members of staff in the office that could deal with any PDG – Access queries seems a significant oversight. It should be noted though that all members of staff we spoke to were courteous and sought to help us as far as they could.

## 6. Conclusion and recommendations

Free School Meals and Pupil Development Grant – Access provide valuable support to children in low-income families. It is clear that there is much good practice already ongoing within Welsh local authorities with regards to the administration of FSM and PDG – Access. This includes:

- The payment of PDG – Access support in advance by the vast majority of local authorities.
- The practice of auto-enrolling children for FSM and PDG – Access if their family receives housing benefit or council tax reduction.
- The provision of additional support to assist families with the cost of purchasing school uniform in years when PDG – Access is not available.
- The publication of clear information online in an easy-to-access format.
- Helpful and supportive staff who are able to assist queries promptly over the phone.

Despite this, we have found some clear shortcomings in the way that some local authorities provide support under both schemes. Families trapped in poverty in these local authorities are faced with great difficulty when seeking to access the support that they are entitled to. It is not right that some families in Wales are being offered second class support. We therefore call on Welsh local authorities to:

- Ensure that all support under PDG – Access is provided in advance, not in arrears, and without proof of payment.
- Ensure any schools administering schemes do so professionally and consistently, without stigma or additional requirements, and over the school holidays.
- Introduce auto-enrolment for families receiving help with housing costs or council tax reduction, and ‘passport’ applicants between FSM and PDG – Access.
- Ensure that all out of date and inaccurate information online is corrected.
- Ensure there is a range of channels for applications, including online.
- Improve the provision of support via telephone so systems are easy to navigate and calls are answered promptly.

## Annex 1

Local Authority	Applying for FSM and PDG-Access	PDG – Access payment	Website information correct?	FSM Allowance
<b>Blaenau Gwent</b>	Auto-enrol if receive HB or CTR	BACS/ Cheque in advance	Yes	Schools decide
<b>Bridgend</b>	Auto-enrol if FSM	BACS/ Cheque in advance	Yes	Approximately £3 but schools vary
<b>Caerphilly</b>	Apply separately	BACS/ Cheque in advance via school	Yes	Primary - £2.10 Secondary - £2.35
<b>Cardiff</b>	FSM & PDG-A on same form	BACS/ Cheque in advance	Yes	Primary - £2.50 Secondary – £2.95
<b>Carmarthenshire</b>	Apply separately	Payment in arrears with proof.	Yes	£2.50 for all children
<b>Ceredigion</b>	Apply separately	Payment made in arrears.	Yes	Information unavailable
<b>Conwy</b>	Apply separately	BACS/ Cheque in advance	Yes	Schools decide
<b>Denbighshire</b>	Auto-enrol if FSM	BACS/ Cheque in advance	Yes	Secondary £2.35
<b>Flintshire</b>	Apply separately	BACS/ Cheque in advance	Yes	£2.40
<b>Gwynedd</b>	Auto-enrol if family receive Housing Benefit or council tax reduction	BACS/ Cheque in advance	Yes	Primary – local authority set price, Secondary – schools decide
<b>Isle of Anglesey</b>	Apply separately	BACS/ Cheque in advance	Yes	Information unavailable
<b>Merthyr Tydfil</b>	Auto-enrol if child receives FSM or apply separately	Varies between schools	Yes	Information unavailable
<b>Monmouthshire</b>	FSM & PDG-A on same form	BACS/ Cheque in advance	Yes	Schools decide
<b>Neath Port Talbot</b>	Apply separately	BACS/ Cheque in advance	Yes	Schools decide
<b>Newport</b>	FSM & PDG-A on same form	BACS/ Cheque in advance	No	Information unavailable
<b>Pembrokeshire</b>	Apply separately annually	BACS/ Cheque in advance	No	Infants – £2.45 Juniors - £2.55 Secondary £2.60
<b>Powys</b>	Auto-enrol if receive HB or CTR	BACS/ Cheque in advance	Yes	Information unavailable
<b>Rhondda Cynon Taff</b>	Auto-enrol if FSM	Varies between schools	Broken link	Secondary - £2.75
<b>Swansea</b>	Auto-enrol if FSM	BACS/ Cheque in advance	Yes	£2.30
<b>Torfaen</b>	FSM & PDG-A on same form	BACS/ Cheque in advance	Yes	Secondary £2.60
<b>Vale of Glamorgan</b>	Apply separately	BACS/ Cheque in advance	Yes	Information unavailable
<b>Wrexham</b>	Apply separately	BACS/ Cheque in advance	Yes	Primary - £2.40 Secondary – £2.45

## END NOTES

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<sup>1</sup> Stats Wales, People in relative income poverty by tenure type, available at -

<https://statswales.gov.wales/Catalogue/Community-Safety-and-SocialInclusion/Poverty/peopleinrelativeincomepoverty-by-tenuretype>

<sup>2</sup> ibid

<sup>3</sup> Joseph Rowntree Foundation, (2016) Prosperity without poverty: a framework for action in Wales. Available at -

<https://www.jrf.org.uk/report/prosperity-without-poverty>

<sup>4</sup> Children's Commissioner for Wales (2019) A Charter for Change – protecting Welsh Children from the impact of poverty. Available at: <https://www.childcomwales.org.uk/wp-content/uploads/2019/04/A-Charter-for-Change-Protecting-WelshChildren-from-the-Impact-of-Poverty.pdf>

<sup>5</sup> ibid

<sup>6</sup> 'Pupil Development Grant – Access' (Welsh Government) <https://gov.wales/pupil-development-grant-access>

<sup>7</sup> Welsh Government, *Free School Meals in Wales: Information for Schools*, available online at -

<https://gov.wales/sites/default/files/publications/2019-03/free-school-meals-in-wales-information-for-schools.pdf>

<sup>8</sup> ibid

<sup>9</sup> In 5 of the local authorities we are awaiting confirmation on how the FSM allowance is set. In a further one we are awaiting confirmation on how the FSM allowance is set and how PDG-Access support is provided.

<sup>10</sup> Children's Commissioner n(4)

<sup>11</sup> ibid

<sup>12</sup> Education Act 1996 s(512)

<sup>13</sup> ibid