

Lifting children out of poverty, the role of the Welsh Benefits System

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Summary

Children are the age group that are most at risk of living in poverty, while working age adults who have children are also at greater risk of poverty than those who do not. The extra costs associated with bringing up children such as the need to buy extra food, extra clothes and live in larger housing can push some families into poverty. It can also deepen the poverty experienced by those already in its grip and denies children many of their basic rights.

Given both the short- and long-term consequences of child poverty it is not surprising that both the Welsh Government and Welsh local authorities have developed support schemes to help families that are struggling financially. These schemes are designed to supplement the assistance provided through the UK's social security system and provide vital support for thousands of households across Wales.

We found that many families valued the support they received, but there are a number of shortcomings with the current system:

- Many low-income families are locked out from receiving support due to arbitrary and inconsistent eligibility criteria.
- Families are deterred from applying for support due to complicated and inconsistent application processes and stigma.
- The value of the support is not sufficient to lift people out of poverty.
- There are many costs associated with raising children which are overlooked by the present system, limiting the effectiveness of existing schemes.

To address these issues and to make a clear commitment as to the minimum quality of life all children in Wales should expect, the Welsh Government should pull together all existing support schemes as part of a broader Welsh Benefits System. The Welsh Benefits System should provide additional support, on top of services that are provided universally, to ensure that families who would otherwise not have the means to attain a decent standard of living, can do so. The Welsh Benefits System should, at the very least ensure that every child is guaranteed:

- A healthy and nutritious diet
- Access to good quality education
- Access to adequate clothing
- A warm and secure home.

The report outlines reforms that should be made to existing support schemes so that a Welsh Benefits System can ensure that no child in Wales misses out of this minimum standard of living. Amongst these reforms are:

A healthy and nutritious diet

- The Welsh Government should immediately amend the eligibility criteria for Free School Meals and Healthy Start Vouchers so that a child in any family that receives Universal Credit is eligible.
- The Welsh Government should immediately amend the eligibility criteria for Free School Meals so that children whose families have no recourse to public funds can receive a dinner.

- The Welsh Government and local authorities should work together to automatically enrol children in families who are eligible for FSMs and Healthy Start Vouchers.
- The Welsh Government should require Local authorities to ensure the FSM allowance is sufficient for a filling mid-day meal. The Welsh Government should review the pilot on providing a breakfast allowance and, if the findings are positive, increase FSM provision.
- Schools and local authorities should work with parents to increase take-up of FSMs.
- Over school holidays families should receive a FSM allowance to help with the cost of providing meals.
- The value of Healthy Start Vouchers should be index linked to the cost of food so maintain their value.
- In the longer term WG should plan to introduce a free mid-day meal for all school pupils by 2025.

Access to a good quality education

- The Welsh Government should require teachers and governors to participate in poverty awareness training.
- Schools should provide financial help to enable children to participate in extra-curricular activities e.g. sport, drama and school trips.
- The Welsh Government should provide each child entering year 7 with a free, 4G enabled laptop to support their learning and equip them with digital skills.

Clothing

- The Welsh Government should strengthen its statutory guidance on school uniforms to cap the cost to the level of PDG-Access Allowance.
- The Welsh Government should immediately amend the eligibility criteria for PDG-Access so that a child in any family that receives Universal Credit is eligible. The grant should be available at the start of every school year.

Child payment

- The Welsh Government should explore the potential of introducing a Welsh Child Payment of £10 a week per child for all families receiving Universal Credit, in line with the model being proposed in Scotland.

1. Introduction

The United Nations Convention on the Rights of the Child (UNCRC), which has been put into law by the Welsh Parliament, sets out that each child in Wales is entitled to good food, to a good standard of living and to become the best that they can be.¹ Too many children are denied these rights because they live in poverty. 180,000 children, 28 per cent of all children in Wales live in poverty.²

The causes of child poverty are varied. Work is not providing parents with sufficient money to enjoy a decent standard of living. Rising living costs, especially the cost of housing is squeezing already low incomes, while the social security system is not providing enough money to breach this gap.

Social security is an essential way of providing or topping up people's incomes when they have no other means or if their means are inadequate. The social security system is, by definition, not devolved to the Welsh Government. However, outside the social security system the Welsh Government and local authorities provide a range of different types of financial and in-kind support to people on low incomes.

These schemes have developed over many years for specific purposes. They have their own eligibility requirements, administrative arrangements and very varied cash values. The experiences of people accessing these schemes is often unsatisfactory, with issues around take up, administrative efficiency, stigma and, sometimes, the impact of some provision.

We have called for the myriad of different schemes that provide cash or in-kind assistance to be considered as a whole, constituting a coherent system of devolved support for people on low incomes. We outlined our initial thinking in evidence to the Welsh Parliament's Equality, Communities and Local Government Committee's inquiry into devolving social security benefits.³ We welcome the Committee's agreement with our proposal and the Welsh Government's acceptance in principle that there should be a Welsh Benefits System.⁴

Since submitting our evidence, we have been developing more detailed proposals by considering existing schemes to support children, young people and disabled people on low incomes and the schemes to help people on low incomes with the costs of housing and healthcare. We have considered the criteria for considering a scheme as a devolved benefit and we have also addressed the principles which in our view should underpin a new approach.⁵

This paper sets out our conclusions in respect of support offered to low incomes families with child costs. We have not considered support which is not devolved, such as Child Tax Credits, and we have included only those devolved schemes which are means-tested, so we have not considered universal or place-based benefits such as Flying Start or the School Holiday Enrichment Programme. We do however recognise that both types of assistance are vitally important to people's standard of living and well-being, and that they help to lift people out of poverty.

The research for this report was primarily undertaken before the full impact of Covid 19 became apparent. The experiences of recent months have served to highlight the

importance of the social security system and the additional support schemes provided by the Welsh Government and Welsh local authorities to low income households. Demand for these support schemes has soared and, in our view, makes the case for an effective Welsh Benefits system even stronger.

Our recommendations set out how the Welsh Government could use a Welsh Benefits System to ensure that it meets its commitments to the UNCRC and guarantees that every family in Wales enjoys a decent standard of living. These benefits should combine with universally provided services such as free school education to ensure every child in Wales gets a fair chance at life.

In making these recommendations we have not only set out the broad framework for achieving such an ambition but also made specific recommendations on how the means tested support provided by the Welsh Government could be strengthened to maximise the number of children assisted out of poverty.

2. Criteria, principles and methods

In February 2020 the Bevan Foundation published its report *The case for a Welsh Benefits System*.⁶ The report argued that there are a number of reasons why a Welsh Benefits System should be established:

- Each support scheme is currently viewed independently with little work being undertaken to understand how schemes interact with each other and the broader UK social security system.
- There is little coherence in the eligibility criteria for different benefits, in the way that they are administered and how the support is provided, making it difficult for families to access all the support they are entitled to.
- The current system does not make effective use of administrative resources with local authority and Welsh Government officials having to process multiple applications from the same family.
- The Welsh Government and local authorities could improve the lives of families trapped in poverty by establishing a Welsh Benefits System without the devolution of further powers.

The report set out why a Welsh Benefits System should be established and also the criteria it should be based upon and the principles that should underpin the system. The key points are set out in the section below.

2.1 Criteria

We adopted three main criteria for determining whether a support scheme falls within the scope of our project. These are:

1. The scheme must be administered by a devolved body or by Welsh local authorities
2. The scheme must either provide cash or relieve costs
3. The scheme must be means-tested.

In adopting these criteria, we are aware that we have not captured all the support available to low incomes families with the cost of raising children. For example, we have not included programmes targeted at children living in areas where a high proportion of children are eligible for Free School Meals such as the Welsh Government's School Holiday Enrichment Programme because they are open to all within those communities but are not available to people on low incomes outside eligible areas.⁷ Similarly we have not included funds and hardship schemes provided by charities to assist families at difficult times such as during the school holidays or at Christmas because they are voluntary. In excluding such schemes, we are not providing comment on their effectiveness.

2.2 Principles

A new benefits system should be underpinned by core principles. We believe that steps taken in Scotland following the devolution of some powers over social security provides a sound basis for our approach in Wales. The Social Security (Scotland) Act 2018 sets out eight core principles that underpin the Scottish Government's approach to devolved social security.⁸ We believe that these could be adapted to work in the Welsh context:

- Welsh benefits are an investment in the people of Wales,
- Welsh benefits are a human right and are essential to the realisation of other human rights,
- the delivery of Welsh benefits is a public service,
- respect for the dignity of individuals is to be at the heart of Welsh benefits,
- Welsh benefits should contribute to reducing poverty,
- Welsh benefits should be designed with the people of Wales on the basis of evidence,
- Welsh benefits should be continuously improved
- Welsh benefits are efficient and deliver value for money.

2.3 What we did

We have based our proposals in this paper on evidence gathered from an initial literature review, a desk-based analysis of each scheme, stakeholder interviews and finally interviews with young people themselves. We engaged with 22 families over summer 2019 in a variety of community settings. These included:

- Action in Caerau and Ely's (ACE) Community Food Pantry in Cardiff
- Denbighshire's Citizens Advice School Uniform Recycling Scheme in Ruthin
- Gellideg Foundation Summer Community Event in Merthyr Tydfil
- Cardiff Community Housing Association's (CCHA) Flourish scheme's Butetown Community Picnic, Cardiff.

We then conducted two stakeholder roundtable discussions with 18 stakeholders with experience of operating parts of system to sense-check our emerging findings. We recognise that the numbers of families involved are small and are not necessarily statistically representative. However, we consider that the information gathered provides valuable insights into the current system. We are also aware that we have not had the time or resources to undertake proper evaluations of each of the schemes –indeed while we have drawn on such reviews where they are available, our concern is to move towards a coherent system rather than assess each scheme on its own merits.

3. The Welsh Benefits System – children and young people

The Bevan Foundation has identified three support schemes that could be included in a Welsh Benefits System:

- Free School Meals
- Pupil Development Grant – Access
- Healthy Start Vouchers.

This section will provide a brief overview of each scheme, examining their aims, the support provided, how the support is claimed, the amount of money invested, and the number of children and young people supported.

3.1 Free School Meals

Free school meals (FSM) are available to young people in maintained schools whose families receive a means-tested benefit or who receive Universal Credit and have a very low income.⁹ Several transitional protections are available to recipients of FSM while Universal Credit is rolled out.

Children are provided with school meals in one of two ways:

1. Pay in advance: Children select their meal at lunchtime, but payment is made in advance, either by parents paying the school/ local authority directly or with the local authority transferring funds to the school/ catering company.
2. Pay as you go: Children select the meal they want at lunchtime and pay for the food at the same time, either through a biometric system or through a card system. Children in receipt of FSM are provided with a daily allowance by the local authority which they can spend as they chose. There is no legal definition of the value of the allowance, with each local authority able to develop its own approach.¹⁰

Traditionally the first approach has been the one adopted in primary schools with the second approach being adopted in secondary schools, but an increasing number of primary schools are now moving towards the 'pay as you go' approach.

Local authorities administer FSMs, with many different application procedures. In some authorities, children whose families receive other local authority benefits e.g. the Council Tax Reduction Scheme are automatically eligible for FSMs, whereas other authorities require annual applications for each child. even though this is not necessary with transitional protection.¹¹ In 2019/20, 85,731 children were estimated to be eligible for FSM with 66,012 children taking up their entitlement.¹²

There is no Welsh Government financial allocation for FSM, with funding coming from local authorities' core expenditure. Not only does the money come from local authorities' core funding but the value of the support provided through FSM is determined by local authorities as well, in line with legislation and guidance. This makes it difficult to get an accurate understanding of how much is spent on FSM every year. The Welsh Government did estimate in 2016/17 that £25m was spent on FSM.¹³ With the number of children

eligible for FSM and who take up their allowance having increased since 2016/17, using the same method as used by the Welsh Government suggests that the annual spend on FSM has increased to around £29m.

However, the method may underestimate actual expenditure. Following the decision to close schools in order to try and limit the spread of Covid 19 the Welsh Government pledged significant extra sums to local authorities to assist them in the delivery of support in lieu of FSM.¹⁴ In making this announcement the Welsh Government set out that every child eligible for FSM should receive alternative support equivalent to £19.50 a week.¹⁵ If this is a more accurate representation on how much is spent per week, per child, in Wales, however, then the amount spent on FSM is close to £50 million.

3.2 Pupil Development Grant – Access

The Pupil Development Grant - Access (PDG – Access) provides children from low-income families with £125 in financial support (£200 if the child is entering year 7) to buy school uniform, equipment, sports kit and kit for activities outside of school.¹⁶

A child that is entering reception or year 3 in primary school, year 7 or year 10 in secondary school, or that is aged 4, 7, 11 or 14 in special schools, special needs resource bases or pupil referral units is eligible for the PDG – Access if they are eligible for free school meals. A looked-after child is eligible for support in every school year.

As with FSM local authorities are responsible for administering PDG – Access. Each local authority designs a system to ensure that families have access to their entitlement, leading to some significant variation.¹⁷ Local authorities have also taken differing approaches to providing support with some transferring cash to eligible families in advance through BACS transfers while others make payments in arrears, requiring families to send receipts of their purchases.¹⁸ In some local authority areas payments are not processed by the local authority but rather by individual schools.¹⁹

The amount spent of the PDG – Access increased to £3.554m for the 2019/20 financial year.²⁰

3.3. Healthy Start Vouchers

Healthy Start Vouchers provide low income parents or pregnant mothers who are in receipt of a means-tested benefit, Universal Credit or Child Tax Credit and have a very low income with support towards the cost of food. Families are entitled to this support if a mother is more than ten weeks pregnant until the child is 4.²¹ The vouchers can be used towards the purchase of milk, infant formula milk or plain, fresh and frozen fruit and vegetables.²² Pregnant mothers and mothers of children between 1 and 4 are entitled to one voucher worth £3.10 every week.²³ A parent of a child that is less than 1, however, is entitled to two vouchers, worth a total of £6.20 per week.²⁴

The way in which families must apply for support is currently undergoing reform, moving from a paper-based system to a digital process. Prior to the outbreak of Covid 19 it was a requirement for parents to obtain the signature of a health professional before making an application, this requirement has now been temporarily removed.²⁵

In May 2019 £235,490 was spent on Health Start Vouchers in Wales, benefitting over 16,000 families.²⁶ However, if all families who were eligible for Health Start Vouchers made an application that number would have increased to 27,000 bringing the total

spend up to approximately £387,901.²⁷ This means that nearly four in ten families in Wales are not claiming the support they are entitled to through this scheme, leading to over £150,000 worth of support going unclaimed and being returned to the UK Government by the Welsh Government.

Healthy Start Vouchers operate across the UK with the exception of Scotland. The Welsh Government does have the power to opt out of the scheme and deliver an alternative if it wished. In February 2020 the Welsh Government announced its intention to review the effectiveness of Healthy Start to consider whether the scheme is the best mechanism for supporting low income families or whether it should push for the devolution of further powers to allow it to develop a more effective scheme.²⁸

4. The experiences of families

Many of the families we engaged with had positive experiences of the benefits currently available. This is perhaps not surprising given the value of the support on offer to individual families.

FSM can save families hundreds of pounds a year. Based on the value of the support that has been provided to each child over the period that schools have been shut due to Covid 19, families could annually be saving over £750 per child.²⁹ This may be an underestimate with some people calculating that the loss of FSM during the school holidays costs families £30 to £40 a week,³⁰ meaning that over a school year FSM can save families over £1,500 per child at the upper end of this estimate. On top of this significant saving a family with a child that was also eligible for PDG-Access would receive a further £125 worth of support, rising to £200 if their child was entering Year 7. A Healthy Start Voucher could save a family an additional £160 a year, or £320 if they had a child under the age of one.

Despite the significant support on offer, our desk-based analysis combined with our interviews with people trapped in poverty and stakeholders revealed significant issues in the design and administration of current schemes.

4.1 Eligibility

We have uncovered concerns that not all young people living in poverty are eligible for the support schemes we have explored in this report.

When living in poverty is not enough

To receive FSM, PDG – Access and Healthy Start Vouchers a family in receipt of Universal Credit must also be on a low income. This hurdle means that there are some families who live in poverty that are not eligible for support.

In April 2019 the Welsh Government changed the eligibility criteria for FSM. Prior to 1 April 2019, a child was eligible for FSM if their parents received one of a series legacy benefit or if they received Universal Credit regardless of their earned income. Now a child whose parents are in receipt of Universal Credit is only eligible for FSM if their household annualised net earned income is no more than £7,400 or £616.77 a month, subject to Transitional Protections.

While these changes have led to a modest increase in the number of children eligible for FSM,³¹ calculations over the summer of 2018 estimated that approximately 55,000 children living in poverty would remain ineligible for FSM under the new approach.³²

The impact of missing out on support can be devastating for families. Recent research published by the Children's Commissioner³³ and the Children's Future Food Inquiry³⁴ have demonstrated this powerfully and our research provides yet further evidence of this. Families who are not eligible for support are affected in several ways.

Missing out on FSM can have a direct impact on a child's diet. Many children have a packed lunch due to the fact that they can't afford to buy school lunches.

"School meals are averagely priced, but, when you've got three children of school age, you're talking nearly £10 per day, so it's kind of never been an option to be honest even to consider it... I think the Government just assume that you have this amount of money, you can just get by."

Laura, Cardiff. Lives with husband and 3 children aged 4, 9 and 12. Husband works full-time but she doesn't. Children are not eligible for FSM.

School meals are far healthier than packed lunches. Children in receipt of school meals eat more vegetables than their counterparts who have packed lunches.³⁵ One study has found that only one per cent of school packed lunches were healthy,³⁶ while a survey of teachers found that they felt that only ten per cent of packed lunches were healthy.³⁷ This has both health and educational implications for children.

27.1 per cent of children between the ages of four and five years in Wales are either overweight or obese,³⁸ with children living in poverty being at a higher risk of being obese than children from higher income households.³⁹ In the short-term, overweight and obese children are at a higher risk of suffering from both physical and mental health illnesses.⁴⁰ In the long-term there is a high risk that those who are overweight or obese during childhood will continue to have such issues as adults, which can lead to longer term health issues.⁴¹ Numerous studies have established that those living in poverty do not eat unhealthy meals through ignorance, but, as a result of them not being able to afford the ingredients to prepare healthy meals.⁴² The provision of healthy school meals can be a useful tool in tackling this problem, placing those children from low income families who are ineligible for FSM at a significant disadvantage.

While there are several factors that impact upon a child's educational attainment there is evidence that diet and nutrition can have an impact on how well a child performs in school. Eating a healthy school meal can have a positive impact on a child's alertness,⁴³ it can improve cognitive performance and behaviour,⁴⁴ and it can lead to improved academic performance.⁴⁵

The impact on a child or a family's diet can be just as pronounced when they miss out on receiving Healthy Start Vouchers where the threshold is income threshold is even lower. A family who is in receipt of Universal Credit is only eligible for Healthy Start Vouchers if their earned income is £408 or less per month.⁴⁶ We heard from one mother who was no longer eligible to receive the vouchers for her 2 year old as her partner had recently started a new job that meant that they now earned over the income threshold. As a result, the mother now had to buy milk formula out of the household budget, meaning that she could no longer afford to buy fruit for the family.

The impact of missing out on support goes beyond the impact it has on a family's diet. Living in poverty increases a child's risk of social isolation.⁴⁷ While there are numerous reasons for this, our research suggests that the current FSM policy and the way it is applied in practice in some school's risk exacerbating this problem and can also have an impact on parents wellbeing.

"The other trouble is that when she has a packed lunch, they're separate from the school meals, so she can't even eat with her friends anyway because they're in two different rooms..."

The children don't get to choose who their friends are, so for example, her little friend, we don't know what her family background is but we know that she's in school dinners and she's not, so she's not penalised but, segregated because she's got to go into a different room...

I think it's also a bit of pressure on the parents because the problem is the child will come on to the parent and say I want school dinners because so and so's there, but if the parents haven't got the money for the actual school meals then its pressure on the parents and makes them think, am I failing this child because I can't pay for school meals and then it makes the parent feel a bit crappy and things like that."

Gwen and Robert – Husband and wife, Cardiff. Live together with their 9-year-old child. Both work full time but are struggling financially. Child not eligible for FSM

Other parents reported that trying to ensure that they had enough money to provide school lunches for their children and adequate school uniform pushed them into debt, impacting their physical and mental health.

On school meals - "It kills us, he (her partner) has his wage at the end of every month, by the time we've paid our rent and council tax that's £500 gone and half of the time he'll have like £700 pay £800 pay, lucky if he has that so obviously by the time I get packed lunch stuff, that costs me £20 a week if not more...

On school uniform – "that's what I started on yesterday, I paid £35 for my oldest so I've got to try doing her one week and then him the other because I haven't got the money to get out and just by the two of them it came to £35 and now I've got to try and borrow money for the gas, electric and shopping.

I suffer really bad from anxiety so it just makes me a thousand time worse... its constant worrying and I'm constantly borrowing as you haven't got the money and when it comes to giving that back then you're struggling because you have to give that back then and then you're left with nothing yourself so it's like a vicious circle, really vicious circle."

Wendy – Merthyr. Lives with partner and 2 children aged 5 and 8. Children not eligible for FSM and PDG - Access

Not only can missing out of FSM and PDG – Access have a devastating impact on many aspects of family life, we heard from one parent that the policy may be pushing some families out of work. The Children Society found that a family with three children currently earning just under the £7,400 limit would lose over £1,000 each year if they were to work a few more hours or get a pay rise.⁴⁸ To be better off financially such a family would have to earn an extra £3,000 a year.⁴⁹ This view was articulated by one parent we spoke to during our research.

Her child has a lunchbox every day as this is her preference but when asked what she would do if her child wanted schools meals she responded "I'd probably have to give up work because it probably wouldn't benefit me working and paying dinners every week. I struggle now but if I had to pay weekly for school dinners, it all adds up."

Mair – Merthyr. Lives with child who's 8 years old. Works but is struggling financially. Not eligible for FSM or PDG – Access.

A system that disincentivises parents from working can have very negative implications for the number of children living in poverty. While nearly one in every four children living in a household where at least one adult is in work lives in poverty, the proportion leaps to three in every four children in households where there are no adults in work.⁵⁰ If the cliff edge of the current approach disincentivises families from taking up more work, the current policy risks embedding child poverty in Wales.

It is not only children who live in households on incomes above the threshold for support but below the poverty line that miss out on vital assistance through FSM, PDG – Access and Healthy Start Vouchers. Some children living in households whose incomes are below the eligibility threshold are also missing out on support, specifically children from families seeking asylum or who have no recourse to public funds. This places enormous stress on some of the most vulnerable families in Wales. While there is some emergency support available to assist such families, the work of the Future Food Inquiry highlighted that its provision varies widely across different parts of the nation, meaning that not all families who need assistance are getting what they require.⁵¹

4.2 Low take up of support

There are thousands of families in Wales who are eligible for support who are not claiming their entitlements. On school census day in 2019/20 25% of children (nearly 20,000), did not take up their FSM entitlement.⁵² This is consistent with previous years. The picture is even worse when looking at Healthy Start Vouchers with 40% of children and pregnant mothers (about 10,000) not claiming their entitlement.⁵³

There are two primary reasons for this low take up:

- issues with the application process
- stigma and the way support is provided.

The application process

In September 2019 the Bevan Foundation published a short report, *Back to school? Local variations in help with costs of school meals and school uniforms*.⁵⁴ The report maps out some of the differences in the way that families must apply for and receive access to FSM and PDG – Access. Through this work we identified three broad approaches taken by local authorities:

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.⁵⁵

We argued in our report that families living in local authority areas that administered FSM and PDG - Access using the first approach were faced with a significant additional burden than those living local authority areas that operated under the second and third approaches.⁵⁶ This was not the only variation we identified. We noted that some local authorities did not provide families with an opportunity to apply for either support schemes digitally,⁵⁷ while others required families to reapply for FSM annually despite the fact that this is unnecessary under the transitional protections introduced when the eligibility criteria for FSM were changed in April 2019.⁵⁸

While speaking to families over the summer of 2019 the importance of providing families with support in the easiest way possible was highlighted starkly by the experiences of one mother.

"I did start applying for it, but you know what, I've been so ill I haven't been bothered.... I haven't been well to finish it, post it off, I don't go places because of my PTSD anyway and I have problems and they've sanctioned my money because I wasn't well and couldn't go down the Job Centre, so they sanctioned my money..."

Caroline – Merthyr. Lives with 3-year-old child, but, has 3 grown up children who no longer live with her. Suffers from significant mental health problems including Post Traumatic Stress Disorder. Her child is eligible for Healthy Start Vouchers, but she has not applied for them.

The existence of any administrative barrier can prevent some vulnerable families getting access to the support that they desperately need. Vulnerable families living in local authority areas where they have to submit separate application forms for FSM and PDG – Access could therefore be at a greater risk of missing out on support than those living in areas that automatically enrol children.

Participants at our roundtable discussions felt that one reason for the differing approaches adopted by local authorities was a lack of clarity from Welsh Government as to how local authorities were expected to administer the schemes. One local authority officer noted, for example, that their team feel that it is possible to read the eligibility criteria for PDG – Access for young people in pupil referral units in more than one way. It was felt that such lack of clarity made life more difficult for local authorities as they tried to administer the scheme and made it unclear to families whether they are eligible for support or not. It was feared that this confusion is discouraging some parents from applying for support.

We did speak to some families who had positive things to say about the application process for FSM and PDG – Access. Many of the parents we spoke to in Cardiff for example were highly complimentary about the local authority's hubs. They reported that staff were happy to help and provided them with great assistance.

On applying for FSM and PDG – Access *"That was really easy. I had a letter in the post which said do I need help with school meals, transport and school uniform and I said yes I said school meals and uniform and less than two weeks later I had a letter saying that he would get free school meals and that I would be getting £125 in my bank for his first school uniform and a few days after that the money went into the bank.... Maybe I was a fluke because it was that straightforward"*

Lydia – Cardiff. Lives with child aged 4 and works part-time. Eligible for FSM and PDG – Access

There is already much good practice in terms of how FSM and PDG – Access are provided in Wales, but this is not universally true. A similar picture emerges when looking at Healthy Start Vouchers.

In order to apply for Healthy Start Vouchers prior to Covid 19 applicants had been required to obtain the signature of a health professional. This requirement has now been removed with families being permitted to submit an application online. From our conversations with families all over Wales, it appears to that the role of Health Visitors and Midwives are crucial in promoting the take up of Healthy Start Vouchers and assisting families in completing their applications. We heard from many parents that their Health Visitor had filled out their form for them.

“My health visitor applied for them and I got them through the post. I didn’t have to fill it out my health visitor did that for me.”

Caryl – Cardiff. Lives with child aged 11 months. Does not work. Eligible for Healthy Start Vouchers

Not all mothers are fortunate enough to have such an experience. We heard from one mother, for example, that her Health Visitor had just filled in all the relevant sections she was responsible for, leaving the mother responsible for the rest. At our roundtable discussions we heard that there are concerns that other Health Visitors may not be actively promoting the vouchers as effectively. Moves to digitise the application process and to notify all new mothers who are in receipt of Universal Credit of the possibility that they can apply for support may, in time, reduce the direct role of Health Visitors in the process. Given how effective they can be in promoting take up, however, it is vital that Health Visitors retain, at the very least a promotional role and that instances of best practice are shared across Wales.

Stigma and support delivery

Stigma remains an issue that discourages some families from claiming their entitlements.⁵⁹ Despite excellent best practice, not every family receives support in a way that minimises this this nor in a way that best meets their needs.

As already discussed, there is significant variation between the way local authorities administer PDG – Access.⁶⁰ Most local authorities provide families with support via a BACS transfer. This approach is not perfect, families who are already in debt risk seeing all support vanishing before they can use it, while not all families have access to bank accounts. We fear that the alternative approach risks deterring families from accessing support.

A small number of local authorities provide PDG – Access support in arrears, with some requiring that families submit receipts to demonstrate what they purchased. Withholding funds until after a parent has bought their school uniform risks low income families having to borrow money while they wait for PDG – Access funds to be paid into their account.

An explanation as to why some local authorities were operating in this way was provided at one of our stakeholder roundtables. One local authority officer told us that in

conversations with Welsh Government officials they were warned that the Welsh Government could ask for evidence as to how parents had spent their PDG – Access allowance at any time. The local authority was eager to avoid the bureaucracy of collecting receipts from each recipient and therefore had inserted a line in its grant awarding letter, informing families that they could ask for receipts as to how they had spent the fund at any time. They would only ever activate this clause if the Welsh Government requested a sample from them, but, they felt, given the lack of clarity they had received, that it was important to have such a clause in there.

There may be other reasons why some local authorities have chosen to take such an approach however, more closely associated with negative perceptions of people who live in poverty. As we were undertaking our research, we contacted all local authorities across Wales to understand how their local authority provided support.⁶¹ During these conversations an officer at one local authority told us.

“The problem is, if we don’t ask for receipts how can we make sure how they spend their money, you know they could just be spending it on booze...”

Anecdotally we have heard of similar attitudes at schools and local authorities across Wales with regards to the way that support is provided in lieu of FSM during the enforced closure of schools due to Covid 19. The presence of such attitudes amongst officials and teachers reinforces the sense that families trapped in poverty are not to be trusted and that they are, in some way, to be blamed for being in poverty, fostering stigma and discouraging families for accessing support they are entitled to and need.

Linked to this we found that in some local authority areas, schools are responsible for distributing PDG – Access funds to families. While many of the families we spoke to had positive things to say about the role their school played in promoting benefits and ensuring that they received the support they were entitled to, there is a concern that some parents are reluctant to share their private information with schools due to stigma. We got a sense of this over the summer 2019 when conducting research for this project.

“I’ve got to be careful what I say because one of the other mums is over there”

Carys – Ruthin. Lives with partner and 2 children aged 5 and 7 years old. Both parents work and are not eligible for FSM or PDG – Access.

Schools clearly have an important role to play in promoting benefits and will inevitably be involved in the administrative process to some extent. We are concerned, however, that if schools are too heavily involved in the administration of support, including distributing PDG – Access funds, some families may be discouraged from applying for support.

The way that children are provided with access to school meals can also reinforce stigma. As our interviewees Gwen and Robert set out in section 4.1, there are still schools in Wales that require children who bring in packed lunches to eat their meals separate from the rest of the school. We also heard that, despite efforts to minimize stigma for children who receive FSM by introducing steps such as biometric payment systems, children can still identify which of their peers receive FSM, deterring some from taking up their entitlement.

Not only does stigma prevent some families from accessing support, families may also misunderstand their purpose, discouraging some from applying. One mother who was eligible for Healthy Start Vouchers had chosen not to make an application.

On why she had not applied for Health Start Vouchers for her youngest child – *“Because I’m breastfeeding really. I claimed them on the youngest two as I formula fed those, but with her, I breastfed her so I thought, you know what, I don’t need them so I’m not going to take from the Government if I don’t need it.”*

Megan –Cardiff. Lives with 3 children aged 2, 9 and 11. Eligible for FSM, PDG – Access and Healthy Start Vouchers. While she had received Healthy Start Vouchers for her eldest two children, she was not receiving Health Start Vouchers for her youngest child.

4.3 Coming up short

There is some concern that the support provided through each support scheme is insufficient to cover the needs of low-income families, and that the quality and value of the provision may not be of the highest standard at all times.

One source of concern is that the allowance that is provided to children who are in receipt of FSM in schools where they pay for their lunch at lunchtime is insufficient. The approach taken in setting the allowance differs by local authority. The most common approach is for the local authority to set an authority-wide allowance, with some differentiating between children in primary school and secondary school. In some local authorities, however, each school decides the value of the allowance.

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. However, research has found examples of children in Wales having to choose between buying a drink and desert at lunchtime.⁶²

The FSM allowance does not only affect children at lunchtime. The Welsh Government’s free school breakfast programme provides assistance to some, but not all, children from low income families in primary schools. There is no similar programme in place in secondary schools. The Children’s Commissioner found that many children in receipt of FSM were hungry at break time and some were dipping into their FSM allowance to buy a snack.⁶³ This meant that they did not have sufficient funds to buy a proper meal at lunchtime.⁶⁴

The Commissioner’s finding is supported by research undertaken by Together Creating Communities (TCC). In the spring of 2018 TCC surveyed 500 children and teachers from five secondary schools across Wrexham and Flintshire (within which one in four children received FSM), about their experiences of food poverty.⁶⁵ They found that 88 per cent of children who received FSM did not have adequate funds to buy breakfast in school and a school lunch.⁶⁶ TCC found that while over half of secondary school pupils regularly or sometimes skipped breakfast before arriving in school because they didn’t have time or didn’t want any breakfast, 18 per cent could not or did not want to explain why they did not have a breakfast, raising concerns that these children were living in households which lacked resources to buy sufficient food.⁶⁷ To counter this issue, the Welsh Government is piloting a system where children are provided with an additional FSM allowance that can only be used for the purchase of breakfast.

Another concern we heard from some parents, was that school meals are poor quality or that children did not like the food provided. These concerns can lead to children who are

eligible for FSM not taking up their allowance. Some parents who are on a low income but who are not eligible for FSM also have concerns about the quality of school meals, in particular with regards to portion sizes.

School meals are great, because obviously they have it all the time, but I only use for the one child, I don't use it for the second child as the second child has packed lunch, fussy eater.

Julie –Cardiff. Lives with 2 children aged 7 and 10. Eligible for FSM and PDG – Access

"even the receptionist has said to me down the school she wouldn't pay £2.20"

Wendy – Merthyr.

This issue is even more pressing in some parts of Wales as a result of the variation in the cost of school meals. The parents of a child who goes to a school in a local authority area where the price of a school meal is £2.30 a day, would spend £3.25 a week less on school meals than the parents of a child who goes to a school in a local authority where a school meal costs £2.95, enough to buy an extra school meal every week. Over the course of the school year the family of a child going to school in the most expensive local authority will have to spend over £120 extra, per child, on school meals than the family of a child going to the cheapest, a significant extra sum.

These concerns matter. As already discussed, there is a body of evidence that demonstrates that the food children take to school in lunchboxes is less healthy than the food provided through school meals. There is therefore a need to reflect on why families, especially those in receipt of FSM are opting out of receiving school lunches.

There are also concerns that the support provided through PDG – Access is inadequate. Families are only eligible for PDG – Access in limited year groups.⁶⁸ Concerns about the adequacy of the support provided through PDG – Access are twofold.

First, parents told us that while the support was of great assistance during the years in which it was available, they still needed to buy school uniform for their children at other ages, be this as a result of their child growing, or due to general wear and tear.

A second weakness with PDG – Access is that while the grant is consistent across Wales, school uniform policy is set by schools themselves, meaning that the cost of school uniform can change significantly. We spoke to one mother in Cardiff who, as a result of her child's school uniform being affordable, had been able to buy her child uniform in multiple sizes, mitigating some of the limitations as to when PDG – Access is made available.

"It is so much easier, his uniform is all ready and because they were so cheap I have bought his uniform in years 3-4 and 4-5 now and a gym kit and a coat, so he has got everything... They are so helpful, I would have struggled if I hadn't had it and I would have panic bought at the last minute but, because the money was there, I was quite happy."

Lydia – Mother, Cardiff.

This is not the case everywhere. The Children's Commissioner's *Charter for Change* highlighted that buying school uniform from a school shop can cost as much as three

times more than the supermarket, with the cost being in excess of the support provided through PDG – Access.⁶⁹ Any school that has an uniform policy which limits where parents can buy it, for example, by requiring a stitched badge on an item of clothing, risks limiting the effectiveness of support provided through PDG – Access, and places great financial pressure on low income families not eligible for support.

While new statutory guidance issued by the Welsh Government does provide clearer steering for school governors as they develop their school uniform policy, it stops short from prescribing a cap on school uniform prices.⁷⁰ It therefore remains at the discretion of each school to set their policy. During our research, parents in Ruthin raised concerns about the cost of school uniform, in particular the cost of a school blazer which cost approximately £30, nearly a quarter of a child's PDG – Access; recent press reports have raised similar concerns in other parts of Wales.⁷¹ It is clear that the updated guidance has not solved the problem of unaffordable uniforms.

There are also concerns about the value of support provided through Healthy Start Vouchers. We heard from stakeholders that the value of the vouchers has not increased in a decade, meaning that the amount of support provided to families has reduced in real terms.

4.4 Other costs

In addition to hearing from low income families about existing support schemes we also asked families about what other living costs, associated with their children they found expensive. There were four costs that appeared regularly in parents' responses:

- School trips and extracurricular activities
- School holidays
- Food and clothing
- Childcare

School trips and extracurricular activities

School trips can provide children with opportunities to learn in different environments and to develop new social and cultural skills. The costs of such trips were flagged as an issue by parents all over Wales. In Ruthin one parent noted that her child had recently been on a trip where she had stayed overnight for one evening. This had cost her £100. In Merthyr a parent noted that she had struggled to pay for a trip that had cost her £60, while parents in Cardiff mentioned a school trip to Llangrannog that would cost them £180.

The expensive nature of such trips impact on families in more than one way. For some, the cost of the trips may mean that they cannot afford for their child to go, leading to them missing out on opportunities enjoyed by peers from higher income households. A report published by the Child Poverty Action Group and the National Education Union (NEU) in April 2018 found that 56 percent of NEU members surveyed knew of children that often or sometimes missed out on day trips because of poverty, and 62 percent knew of children who missed out on residential trips for the same reason.⁷² Some of the parents we spoke to were aware that this was a problem in the school that their children attended.

"Lots of children cannot go on school trips and you shouldn't see poverty and wealth in schools"

Rhian – Merthyr. Lives with 3 children aged 2, 5 and 8. Works. Not eligible for FSM or PDG – Access.

Other parents reported making personal sacrifices, to ensure that their child did not miss out on an opportunity.

"She's got a school trip coming up now in January where she's going to Disney World in Paris, it's costing us £400. That's only for two days ... and we're like, how are we going to afford that? It's a lot for her to understand that every penny that we've got has got to cover bills an everything as well as some of it going on the school trip, but, it's a once in a lifetime experience so we want her to go because we're never going to be able to afford to take her as parents, and we know what it's like as kids when your mum and dad say they can't afford it..."

I'm taking on babysitting things that I normally wouldn't take on, late nights, emergency childcare... because I know I need the extra money to go towards the trip..."

Gwen and Robert – Husband and wife, Cardiff.

Parents did report that schools provided them with an opportunity to pay for large trips in instalments, but some of these could be quite significant. The Disney trip, for example, could be paid in ten instalments of £40. Some parents also reported that they were provided information about "less expensive" trips at short notice. While the costs of these trips may have been smaller, parents reported that it could be an issue finding money at short notice.

This concern was echoed at our roundtable meetings. Stakeholders argued that the cumulative effect of smaller trips and other school activities and fundraising efforts, such as own clothes day where children must bring in a £1 donation could be significant for low income families. The Children's Commissioner also found similar concerns, noting how such costs combine with the costs of buying books and stationery to make the cost of the school day a significant expense for many families.⁷³

This is closely linked to another issue, the cost of extracurricular activities. As with school trips, extracurricular activities provide children with an opportunity to enhance their learning, to develop new skills and to keep healthy. Many of the parents we spoke to were eager for their children to take advantage of the opportunities presented by being part of sports teams, dance or drama classes, or through activities such as swimming.

"I'm really lucky, my parents pay for all my children's activities, swimming, dance, drama. If I had to pay for them, they probably wouldn't do them all. My mum was only saying yesterday there's 5 grandchildren they pay for just to swim so that's £22 per grandchild, and obviously we have 3 that would cost us £66 per month."

Laura – Mother, Cardiff.

Other parents were not able to draw on family support meaning that their children miss out. Children from low income families are less likely to be involved in sporting activities than children from higher income households.⁷⁴ We heard from one parent in Merthyr whose child had had to give up guitar lessons as she could not afford for him to have the

lessons and attend the local chess club. There was also concern from the parents in Ruthin that the costs of extracurricular activities could be even more prohibitive in rural areas, given the additional travel they would have to undertake.

School holidays

Some of the challenges faced by low income families over the school holidays, in particular holiday hunger, have recently attracted significant attention from the press,⁷⁵ civil society⁷⁶ and politicians.⁷⁷ The Bevan Foundation itself has published a report *Kids on the breadline: solution to holiday hunger* exploring the issue.⁷⁸ It was therefore not surprising that many families flagged up the cost of school holidays as an issue they faced. It was not just issues directly related to holiday hunger that parents raised. Another prevalent concern was the challenge of finding sufficient funds to entertain their children over the holidays.

Many parents noted that they were aware of places where they could take their children for a free day out. The problem with such places is that there is still the cost of travelling and providing food and drink throughout the day.

"I worry about entertaining him. There are child playschemes, but he gets bored and he needs to be out. I took him to St Fagans the other day and although it is £5 parking, it is a free day out. But it ended up costing me £30 because it was £1.60 for a bottle of water and he wanted a sandwich, but that is everyday life."

Lydia – Mother, Cardiff.

Such concerns mean that even if a child growing up in a low-income family manages to avoid holiday hunger, they may have fewer opportunities over the holidays than those from higher income families.

Food and clothing

Many parents described the difficulties of meeting the general cost of living, especially food and clothing. It is estimated that 8 percent of adults living in England, Northern Ireland and Wales live in food insecurity.⁷⁹ This is not surprising given that the poorest 20 percent of families that have children must spend 36 percent of their disposable income on food, after their housing costs have been deducted.⁸⁰

When asked what costs associated with raising her children, she found expensive, - "Fresh fruit and veg. That is just a nightmare when they're at home now. They just go through it. Everything else is just optional toys and things but it's the adverts just constantly but I say no, but food and clothing is compulsory."

Carys, mother, Ruthin.

Both the short-term and long-term consequences of missing out on a healthy, balanced diet can be significant for the child and for the parents.⁸¹

The cost of clothing is another significant, non-optional cost that many families struggle with, as indicated by Carys. Given that children grow rapidly, many parents find it difficult to find enough money to ensure that their children were always adequately clothed, with expensive items such as winter clothing being especially challenging. Lacking resources

to buy adequate clothing can not only impact on a child's wellbeing but can also worsen the stigma of living in poverty, meaning that children from low income households are unable to keep up with the latest trends and fashion.⁸²

Childcare

The final expense mentioned by parents was childcare. There are schemes in place, funded by the Welsh Government designed to help families with the cost of childcare, while parents can claim further support through Universal Credit. These include the 30 free hours of childcare offer, the Parents, Childcare & Employment programme and the provision of free childcare in Flying Start areas. Given that these schemes fall outside the criteria for this project we will not explore them in detail. However, we did hear some concerns from parents that the current provision did not meet their needs.

One mother who worked in a role that had no fixed hours described that she sometimes worked 16 hours a week. But because her average hours of work were less than 16, she did not qualify for the 30 hours offer. As a result, she paid £45 per day in childcare on the days she works. She noted that while she would like to work more hours, it was not worth her doing so without the guarantee that she would reach the 16 hours average.

Other parents reported that the cost of childcare had led to them giving up work when their children were born or had discouraged them to return from work on a full-time basis, as it was not worth their while doing so. Given the clear evidence that being in work reduces a household's risk of poverty, there is a clear risk that childcare costs may be trapping some families in poverty.⁸³ These concerns are discussed in greater detail in our report with Chware Teg, *Trapped: poverty amongst women in Wales today*.⁸⁴

5. Reforms – ensuring every child gets the support they need

The current system of providing support to low income families does not work as well as it should. Too many families who need support are not eligible while inefficient administration and burdensome application processes is deterring others. Even when families do receive support this is not always sufficient, while extra costs, for which there is no help, can squeeze family budgets further. These failures do not only undermine the Welsh Government's efforts to end child poverty, but also its commitment to the UNCRC.

To address these issues and to make a clear commitment as to the minimum quality of life all children in Wales should expect, the Welsh Government should pull together all existing support schemes as part of a broader Welsh Benefits System. The Welsh Benefits System should provide additional support, on top of services that are provided universally, to ensure that families who would otherwise not have the means to attain a decent standard of living, can do so. Our initial proposals as to the role of the Welsh Benefits System in ensuring that every child in Wales is guaranteed a minimum standard of living are set out below.

5.1 Every child should be guaranteed a healthy and nutritious diet.

The health and educational benefits of ensuring that all children in Wales receive a healthy and nutritious diet in both the short and long term are clear. All children in Wales should be guaranteed such a diet.⁸⁵The Welsh Benefits System should play a prominent role in achieving this goal, providing additional support to families who are trapped in poverty.

During term time this support should include the provision of a healthy breakfast and a healthy lunch, free of charge for all children trapped in poverty, and the provision of financial support to the parents of young children. While we believe that the two support schemes that are currently in place to achieve these goals; FSM and Healthy Start Vouchers provide a good basis for the provision of this support, there are a number of improvements that should be made to them.

Every child who needs support gets it

Too many children trapped in poverty currently miss out on FSM and Healthy Start Vouchers as they do not satisfy arbitrary eligibility criteria. **We believe that the Welsh Government should amend the eligibility criteria for both schemes so that all families that are in receipt of Universal Credit are eligible for support.** This would mean that nearly all children living in poverty would be eligible for support via the schemes once the roll-out of Universal Credit has been completed. All families in receipt of Universal Credit have been deemed by the state to need financial support, yet additional and arbitrary thresholds limits help to the poorest of the poor. **As a longer-term objective, the Welsh Government should explore the possibility of rolling-out FSM to all school pupils.** This would ensure that no child living in poverty would miss out on school meals while also reducing the stigma around FSM. **Steps should also be taken to ensure that children from families who have no recourse to public funds are provided access to this support.**

In addition to increasing the number of children eligible for support through amending eligibility criteria the Welsh Government should take steps to improve the administration of the schemes to encourage take up. **All officials should ensure that families are able to apply for support in the way that best suits them, be this applying digitally, on the phone or by post.**

Many local authorities in Wales have already designed a system that automatically enrolls children who receive support via the Council Tax Reduction Scheme and Housing Benefit for FSM if they meet the eligibility criteria. **This approach should be rolled out across Wales, with families only being required to submit a single application for all means tested local authority support.** The Welsh Government should also work with the UK Government to see whether it would be possible to automatically enrol families who receive Universal Credit to Healthy Start Vouchers.

The support on offer should be of the highest quality

The Welsh Government should undertake a review of FSM allowances. The review should consider whether all local authorities are complying with their legal obligation to ensure that all children in receipt of FSM are provided with a free lunch and review the success of its trial to supplement the support that secondary school pupils receive to cover the cost of breakfast. Undertaking such a review would also provide the Welsh Government with a clearer idea of how much is spent on FSM rather than relying on estimates based on the FSM rate in England. **In the interim, local authorities should immediately take action to ensure that all children within their authority are provided with a sufficient FSM allowance to meet their needs.**

Schools and local authorities should also engage with families whose children are eligible for FSM but who do not take up their entitlement to consider what more can be done to encourage families to use FSMs. Through this, authorities could consider whether they need to increase the quality or portion sizes of their meals or consider introducing tasting sessions for children who are reluctant to try new food.

The value of the support provided through by Healthy Start Vouchers should be increased so that it does not continue to fall in real terms. Given the modest value of the vouchers if the current trend continues, they will be of limited value to families. **If these reforms cannot be achieved through the current system, then Welsh Government should request the full devolution of powers over Health Start to design its own scheme.**

Support over the school holidays

Over the school holidays, payments should be made direct to parents to allow them to purchase healthy food and to prepare and cook it. This should be closely modelled on the system introduced by the Welsh Government in reaction to Covid 19.⁸⁶ Additional support should be made available for those who wish to access it outside of the Welsh Benefits System, for example, through the School Holiday Enrichment Programme.

5.2 Every child should have access to good quality education

Every child in Wales should be guaranteed access to a good quality education, between the ages of 0 and 16, including learning opportunities through good quality childcare,⁸⁷ and high-quality education through our schools.

To ensure that schools provide good quality education it is important to look beyond the classroom and to their broader culture. Many of the issues faced by families locked in poverty are exacerbated by the way schools operate or by the attitudes of teachers, governors, and local authority staff.

To reduce these issues, it should be mandatory for all teachers and governors to receive training on the impact of poverty on children. A number of resources to assist teachers and governors have already been developed including the Children Commissioner's, Cofia Ceri/ Check with Ceri resource, and the resources developed by Children in Wales.⁸⁸ It is vital that staff and governors in all schools in Wales, regardless of how prevalent poverty is within their community take action based on these materials to lessen its impact on children.

Children should not only be provided good access to quality education at school, but also outside the classroom be this when doing homework, or through taking part in extracurricular activities and going on school trips. **All schools in Wales should make funds available to assist low income families with the cost of extracurricular activities and school trips.** While this is unlikely to assist families with the costs of extremely expensive trips abroad, it could be of real value for families trapped in poverty who may not be able to pay for the coach fare for their child to go and play rugby, football, netball or hockey at another school for instance.

The Welsh Benefits System could play a role in assisting the way children learn outside the classroom. **In response to Covid 19 the Welsh Government has provided funds so that 4G enabled laptops have been provided to digitally excluded children to allow them to continue learning from home.**⁸⁹ The need for children to access technology to assist with their learning will not stop with the end of the pandemic. **The Welsh Government should therefore roll out the scheme so that every child who receives Universal Credit is provided with the means to continue their learning outside of school.**

5.3 Every child should have access to adequate clothing.

All children in Wales should be guaranteed good quality clothing. Children without access to such clothing are at greater risk of social isolation and can be prevented from fully engaging in education or from taking advantage of all extra-curricular activities.

The Welsh Government should strengthen its statutory guidance on school uniforms to introduce a financial cap on the cost. We believe that it should be amended to ensure that no family must spend more than their PDG – Access allowance on school uniforms.

The Welsh Benefits System should play an important role in ensuring that all children have adequate clothing.

PDG – Access should be available to all children whose families are in receipt of Universal Credit and who are attending school, regardless of their age. This would end the current situation where low income families must shoulder the significant cost when needing to buy school uniform in years where support is not available, be this as a result of wear and tear, or simply as a result of their child growing. Making this reform, alongside placing a tighter cap on school uniform costs could significantly free up resources for families, allowing them to buy additional clothing for extracurricular activities as was originally envisaged when PDG – Access was introduced.

5.4 Every child should be able to live in a warm and secure home

Having a warm and secure home is vital in providing children with the opportunity to develop and grow. The Bevan Foundation set out ideas on how the Welsh Government could guarantee this to everyone in Wales, and the role of the Welsh Benefits System in achieving this in its report, *Solving poverty: Reforming help with housing costs as part of a unified Welsh Benefits System*.⁹⁰

5.5 A Welsh Child Payment

In the medium to long term the Welsh Government could consider further strengthening the support provided through the Welsh Benefits System to children by introducing a Welsh Child Payment in line with the model that is being introduced in Scotland.

In November 2020 the Scottish Child Payment will begin providing low income families in Scotland with direct cash support. The Scottish Child Payment will provide the families of children who are in receipt of Universal Credit with a weekly payment of £10 per child.⁹¹ It is estimated that when the policy is fully rolled out by the end of 2022, the families of 410,000 children will receive support, amounting to £500, per year, per child.⁹² It is projected that 30,000 children will be raised out of poverty as a result of the policy, and it will provide vital support to those families who will still be caught in poverty.

At present it appears that the Welsh Parliament does not have the legislative competence to introduce such a payment if the Welsh Government was minded to do so. The Welsh Government should therefore monitor the operation of the payment in Scotland to see whether it is successful in boosting families incomes and assisting families with many of the additional costs that the Welsh Benefits System currently does not provide support towards.

If results from Scotland appear positive, then the Welsh Government should seek the devolution of the relevant powers to permit it to establish such a payment in Wales.

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