

A Welsh Benefits System, how it can help solve poverty

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Summary

Social security provides a lifeline for people trapped in poverty. The social security system is, by definition, not devolved to the Welsh Government. However, the Welsh Government and local authorities provide a range of different types of financial and in-kind support to people on low incomes which provide an additional lifeline.

For the past eighteen months the Bevan Foundation has been working to better understand how these devolved schemes operate. We have uncovered that over £400 million is spent annually on them and that they provide vital support for people who have been swept into poverty.

There are some significant shortcomings with the current system, however. The schemes are currently largely viewed as independent from each other, meaning that people must make multiple applications to different organisations or departments. The support provided is not always sufficient to lift people out of poverty, and arbitrary and complex eligibility criteria are preventing many people from accessing the system.

Poverty could be reduced if the existing devolved schemes were pulled together into a coherent, effective and fair Welsh Benefits System. The aim is to complement the UK social security system, not replace it nor reduce its provision in any way. This report summarises why a Welsh Benefits System is needed and paints a picture of what a good system would look like.

Underpinning all our recommendations are five key principles which should be essential features of any Welsh Benefits System:

- It focuses on households on low incomes, defined as those eligible for Universal Credit, and uses this criterion across all schemes.
- It provides cash or in-kind help that is sufficient to make a real difference to households' incomes or costs.
- It has a single point of access for several benefits, using online, phone or postal methods.
- It is based on eligibility for and an entitlement to assistance, not discretion.
- Applicants are treated with dignity and respect.

In addition to outlining what a Welsh Benefits System could look like and achieve, the report outlines some specific recommendations which, if implemented, would strengthen the schemes allowing them to more effectively lift people out of poverty.

1. Introduction

Social security is an essential way of providing or topping up people's incomes when they have no other income or if their means are inadequate. The social security system is, by definition, not devolved to the Welsh Government. However, alongside 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 provide as much of a lifeline as the UK social security system.

For the past eighteen months the Bevan Foundation has been working to better understand how these devolved schemes operate.¹ We have uncovered that over £400 million is spent annually on them, and that people trapped in poverty greatly welcoming the lifeline that they provide.

The importance of the schemes operated by the Welsh Government and Welsh local authorities has been highlighted in 2020 like never before. They have provided a vital extra safety net for the 700,000 people who were already in poverty prior to the outbreak of Covid-19 and for the many more who have seen their incomes fall and their living costs rise due to the economic impact of the pandemic, without impacting on people's entitlements in the UK social security system.

Despite being valued by families across Wales we have found some significant shortcomings in the current system. The schemes are currently largely viewed as independent from each other, meaning that people must make multiple applications to different organisations or departments. The value of the schemes is not always sufficient to avoid trapping people in poverty, and arbitrary and complex eligibility criteria prevent some people from accessing the system.

Poverty could be reduced if the existing devolved schemes were pulled together into a coherent, effective and fair Welsh Benefits System. To date, we have published five reports outlining our recommendations on how a Welsh Benefits System could be established and the changes needed to each scheme. These reports are:

- The case for a Welsh Benefits System²
- Back to school? Local variations in help with costs of school meals and school uniforms³
- Learning a living: better support for post 16 learners⁴
- Solving poverty: Reforming help with housing costs⁵
- Lifting children out of poverty, the role of the Welsh Benefits System⁶

This report pulls together the key recommendations from our publications to date, and combines them into a single and coherent system. The report answers four questions:

- What would a Welsh Benefits System look like?
- What is included?
- Why does a Welsh Benefits System need to be created?
- What needs to be done?

2. What would a Welsh Benefits System look like?

While the social security system has, by definition, not been devolved, the Welsh Government and local authorities provide a range of different types of financial and in-kind support to people on low incomes, ranging from Free School Meals to the Discretionary Assistance Fund. This support complements and supplements the UK social security system but does not replace it.

The value of these schemes is significant: more than £400m is spent by the Welsh Government on various grants, allowances and in-kind provision where eligibility is restricted to people on low income.⁷ To put this figure in context, this is about the same as the Department for Work and Pensions expenditure on Job Seekers' Allowance and Universal Credit in Wales in 2018/19.⁸

Despite this significant expenditure, the current system is disjointed, leaves some people without enough money to meet their needs, and misses out others completely. We propose that these schemes should be radically overhauled and brought together to create a Welsh Benefits System.

A new system would offer cash or in-kind services that reach the people who need them, are easy to access, are efficiently and consistently administered and, crucially, lifting people out of poverty. The key features of our proposed Welsh Benefits System are:

- It focuses on households on low incomes, defined as being eligible for Universal Credit, and uses this criterion across all schemes.
- It provides cash or in-kind help that is sufficient to make a real difference to households' incomes or costs.
- It has a single point of access for several benefits, using online, phone or postal methods.
- It is based on eligibility for and an entitlement to assistance, not discretion.
- Applicants are treated with dignity and respect.

This new system could mostly be established within the powers already devolved to the Welsh Parliament. It does not require potentially protracted negotiations with the UK Government to acquire new powers nor does it come with the financial risks that could accompany any budgetary devolution. It can therefore be implemented quickly by the Welsh Government and local authorities.

This new system would also complement the UK social security system, but because it is based on existing, devolved provision any changes in their cash or in-kind value would not be regarded as income and affect social security benefits.

3. What is included?

We have identified twelve different devolved schemes that should be viewed as part of a Welsh Benefits System. They have been selected based on three criteria:

1. They are administered by a devolved body or by a Welsh local authority.
2. They provide households with cash or reduce their costs.
3. They are means-tested, rather than being targeted on specific groups of people or places.

We have deliberately excluded a number of schemes which are often considered to be part of the Welsh Government's efforts to tackle poverty.⁹ Many are very worthwhile in their own right, but either do not narrow the gap between the most- and least-well-off or are poorly targeted on people who need them. The schemes we have excluded are:

- Universal schemes, such as free prescriptions and free entry to museums, because they provide the same reduction to everyone irrespective of their incomes.
- Conditional schemes, available to everyone in a specific group, such as concessionary bus fares for older people or free childcare for working parents, because they provide the same reduction to everyone within the eligible group.
- Place-based schemes, such as the School Holiday Enrichment Programme and Flying Start, because they provide services to everyone in the area irrespective of income but exclude people in poverty who live elsewhere.
- Optional schemes, such as free school breakfasts, which are dependent on decisions of participating bodies.

We have also excluded support for undergraduate and postgraduate students. Student finance is a combination of means-tested and non-means-tested grants and loans, and costs approximately £370m a year. Given that it is conditional (in that it is only available to higher education students) and a hybrid we have excluded higher education student support from the scheme.

An overview of the schemes which we have decided to include in the Welsh Benefits System and their annual costs is at Table 1. It is worth noting that annual expenditure per scheme is not readily accessible, the basis of information varies and in some schemes (such as Free School Meals) the costs are simply not known.

Based on the financial data, by far the largest current scheme is the Council Tax Reduction Scheme at £271.9m (considerably less than expenditure on higher education student finance). Other schemes are all very much smaller, such as Pupil Development Grant – Access (£3.6m) and Healthy Start Vouchers (£2.8m) despite providing vital food and clothing to the very poorest of children.

Table 1: Welsh Benefits Overview

Scheme	Purpose	Total Spend/ Budget ¹⁰	Notes
Council Tax Reduction Scheme	Exempts low income household from having to pay Council Tax or provides them with a discount. NB this is distinct from the Single Person Discount.	£271.9m	2019/20 total spend
Disabled Facilities Grant	Assists low income households with the costs of adapting a home to meet the needs of a disabled person.	£33.8m	2018/19 total spend
Free School Meals	Provides children from low income households with a free lunch in school.	£29.0m	2019/20 total spend*
Discretionary Housing Payments	An additional, discretionary payment for low income households that are struggling to cover housing costs.	£26.4m	2020/21 budget for 2020/21**
Education Maintenance Allowance	A cash payment that supports a young person from a low income household to continue their education after the age of 16.	£17.0m	2018/19 total spend
Welsh Government Warm Homes Programme – Nest	A grant that enables a low income household that is in fuel poverty to make their home more energy efficient.	£15.9m	2018/19 total spend
Discretionary Assistance Fund	Emergency cash and in-kind support to people on low incomes.	£12.5m	2019/20 total spend***
Welsh Government Financial Contingency Fund (Further Education)	Additional discretionary financial support for young people on low income who are in further education at a college to allow them to undertake their studies.	£6.3m	2016/17 total spend
Welsh Government Learning Grant Further Education	A grant to enable someone aged 19 or over, who is on a low income to enter further education.	£5.0m	2018/19 total spend
Pupil Development Grant - Access	A cash grant of £120 for children from low income families entering reception, year 3, and year 10 and £150 grant for a child entering year 7 to cover the cost of school uniform.	£3.6m	2019/20 total spend
Healthy Start Vouchers	Vouchers to enable low income families to purchase fruit and vegetables, or milk formula during pregnancy and a child's early years.	£2.8m	2018/19 estimated spend
Help with Health Costs (NHS Low income scheme)	Support for people on low income to cover the costs of services that are not provided free through the NHS.	N/A	

*This estimate is based on the number of children who were receiving Free School Meals on School Census Day 2019/20. The number of children both eligible and taking up their Free School Meals entitlement increased sharply following lockdown meaning that this figure is likely to be an underestimate.

** £10.53m of this comes from the DWP with Welsh local authorities being permitted to spend an additional £15.8m out of their own funds.

***The total spend for 2020/21 is likely to be significantly higher with the Welsh Government having already committed to spending an additional £11m to deal with the impact of Covid-19.

4. Why a Welsh Benefits System?

Despite providing a lifeline to thousands of families in Wales, there are some significant shortcomings with Welsh Government and local authority support schemes. These are limiting their effectiveness in lifting families out of poverty. Establishing a Welsh Benefits System would provide an opportunity to remedy some of these issues.

Detailed analysis of the weaknesses of individual schemes can be found in each of our published reports. Through this work however, we encountered some common issues that restricted the effectiveness of all support schemes.

Eligibility criteria

Although most schemes have broadly similar goals, there is significant variation in the eligibility criteria. For example, all the schemes that either directly or indirectly provide support with housing-related costs have different eligibility criteria.¹¹ This makes it difficult for people to know what they are eligible for and it also makes it difficult for those administering the schemes to passport families from one to another.

Not only are the eligibility criteria for each scheme different, they are often set at levels which exclude working families in poverty. To be eligible for Free School Meals for example, a family must either be in receipt of certain legacy benefits or be in receipt of Universal Credit and have an earned income of less than £7,400 a year.¹² The income cap for those in receipt of Universal Credit was introduced by the Welsh Government over the summer of 2018. At the time, it was estimated that as many as 55,000 children who were living in poverty would be ineligible for support through this additional criterion.¹³ The number of children living in poverty but not eligible for Free School Meals because they are not poor enough may have increased further as a result of the falls into income resulting from Covid-19.

Access

The wide range of organisations which are responsible for the various schemes mean that families must submit multiple applications to access all the support they are entitled to.

The complexity of the current system can be demonstrated when looking at the process a family with two children, one aged 17 in further education and one aged 11 entering secondary school would have to go through, assuming their income was sufficiently low to satisfy eligibility criteria. For the child entering secondary school the family would need to make an application to their local authority for Free School Meals and the Pupil Development Grant - Access. For the child in further education they would need to make an application to Student Finance Wales for the Education Maintenance Allowance. The family would also need to make an application to their local authority for Council Tax Reduction Scheme.

If the family's income fell during the year or their costs increased, they would need to make an application to the further education college to gain access to the Welsh Government's Financial Contingency Fund (Further Education), the local authority for Discretionary Housing Payment, and the Welsh Government for the Discretionary Assistance Fund. Such complexity creates very significant barriers to families. It is hardly surprising that we found evidence of considerable, accidental underclaiming.

Even where multiple schemes are administered by the same body we have uncovered examples of households having to submit multiple applications. Despite the eligibility criteria for Free School Meals and the Pupil Development Grant - Access being identical (bar PDG Access only being available to children entering certain year groups) some local authorities are requiring families to submit separate applications for each scheme.¹⁴ There are other local authorities, however, taking innovative measures to reduce the number of applications a family must submit. For example, some local authorities have developed mechanisms that allow them to ensure that children in households who are in receipt of the Council Tax Reduction Scheme are also eligible for Free School Meals and Pupil Development Grant - Access.¹⁵

In addition, there are barriers in the application process. People are not able to apply for all the support schemes through the medium of their choice i.e. digital, by post or by telephone/ in person. We heard from people with experience of accessing the system how important that choice is,¹⁶ especially for those with limited digital connectivity, limited literacy or digital literacy skills and for people with certain physical or mental health conditions.

Value

Some schemes are of limited value, and therefore do not provide people with sufficient assistance to make a real difference to their lives. The Education Maintenance Allowance for example provides young people from low income families in post 16 education with £30 a week in support. This figure is unchanged since 2004/05. Had this increased in line with inflation it would now stand at £45 a week.¹⁷ While the young people we spoke to undertaking our research for this project were extremely grateful for the support provided, many raised concerns that it was a limited amount and that it was only through the support of their parents and taking on part time work that they were still able to afford to continue in education.

Similar concerns were raised with regards to a number of other support schemes. There are concerns that the Free School Meal allowance provided in many secondary schools in Wales is inadequate to cover the full cost of a lunch and a drink.¹⁸ Not all families in receipt of the Council Tax Reduction Scheme are eligible for a full exemption from their Council Tax, whilst the value of support provided through Discretionary Housing Payments varies widely across Welsh local authorities.¹⁹

Gaps in provision

A concern that has emerged through our research is that some discretionary schemes that were originally designed to provide support as a last resort to people who may have fallen through holes in the UK's social security safety net are increasingly being relied on to keep families afloat on a long term basis. The Discretionary Assistance Fund and in particular Discretionary Housing Payments have significantly grown since their introduction.

One of the reasons for the increased reliance on discretionary schemes is that the UK Government's programme of welfare reform has moved some of the costs of social security from a rights-based system administered by the UK Government to a discretionary system administered by the devolved governments and local authorities. Discretionary schemes provide households with less certainty about their eligibility, and

allow arbitrary differences between people in the same circumstances. As a result there are concerns that many households are falling through the net, either as a result of being deterred from applying or as a result of vagaries in the decision making process.²⁰

A related concern is that there are gaps in both the UK social security system and Welsh schemes. For example, we heard from a number of parents who said that even if they received Free School Meals and Pupil Development Grant - Access, they still struggled with the cost of the school day, be this paying for trips, extracurricular activities or purchasing materials for going to school.²¹ We also heard concerns about the Discretionary Assistance Fund. A single person applying for support through the fund for furniture for example, is only eligible for an armchair, not a sofa making it difficult for them to welcome people to their home and increasing their risk of isolation.

5. How to create a Welsh benefits system

Establishing a Welsh Benefits System would resolve many of the major issues with the way that support is made available to low income households. Viewing all schemes as part of one, cohesive system would allow eligibility criteria to be rationalised and streamlined, the application process to be simplified and the level of support to be adequate.

Ministerial responsibility

To underpin that coherence, we suggest that a cabinet position for the Welsh Benefits System be established in Cabinet, with the relevant Minister being responsible for its effective delivery. With a budget of at least £400m a year, this is significantly more than Environment, Energy and Rural Affairs, and International Relations and the Welsh Language, two portfolios that have their own Ministerial position at cabinet.²² If necessary, this responsibility could be combined with responsibility for Housing and Local Government, given that many of the predecessor schemes are already the responsibility of the Minister and the Deputy Minister for Housing and Local Government.

Principles

Regardless of which of these approaches is adopted by the Welsh Government we believe that a Welsh Benefits System should be based on five key features. These are:

- It focuses on households on low incomes, defined as being eligible for Universal Credit, and uses the same criterion across all schemes.
- It provides cash or in-kind help that is sufficient to make a real difference to households' incomes or costs.
- It has a single point of access for several benefits, using online, phone or postal methods.
- It is based on eligibility for and an entitlement to assistance, not discretion.
- Applicants are treated with dignity and respect.

Beyond these overarching key features, we have identified other specific improvements and reforms that should be made to specific schemes to help lift more people out of poverty. They are described below – the underlying rationale for these proposals are set out in the reports already published as part of this project.

Welsh Housing Benefits

Housing costs are by far the largest living expense faced by most people, with the cost of housing alone pushing thousands into poverty. Welsh schemes already provide people with significant support towards their housing costs. There is much more that could be done however, to provide additional resources to lift people out of poverty.²³ These measures include:

- Apply consistent criteria and processing standards across Wales.
- top up Discretionary Housing Payments to provide sufficient funding to ensure the budget is adequate for demand.
- Seeking devolution of Discretionary Housing Payments from the Department for Work and Pensions to establish a Welsh Housing Support Fund.

The support scheme with the highest expenditure is the Council Tax Reduction Scheme (CTRS). Despite spending more than £270m on the Council Tax Reduction Scheme there are some significant shortcomings with the current support on offer.²⁴

The number of recipients had been falling year on year prior to outbreak of Covid-19.²⁵ This reduction can in part be attributed to the difficulties faced by households accessing the scheme. Many working households are not eligible²⁶ while some working households who are eligible have seen the value of the support on offer decrease from a full exemption to a discount.²⁷

The rollout of Universal Credit has also added an extra barrier to people accessing the scheme. Claimants must now submit a separate application for CTRS rather than the previous arrangement of being passported onto it from housing benefit.²⁸ As more and more households move onto Universal Credit more people are missing out on support.²⁹

These shortcomings could be remedied by:

- Increasing take up of CTRS by immediately ensuring that UC claimants are 'passported' to the scheme.
- Increasing the Council Tax reduction offered to low-income households by reducing the income taper.
- Working with the Department for Work and Pensions to amend the application form for Universal Credit for Welsh applicants to allow for easier auto enrolment onto CTRS.

Welsh Education Benefits

Children growing up in poverty are less likely to achieve the top marks in school and are less likely to continue their education after the age of 16. There are multiple reasons for this.

For young people wishing to continue their education past the age of 16 a lack of money can be a significant barrier. Whilst there is generous support available for those wishing to enter higher education, 16 to 18 year olds and young people in further education have to rely on low-value, tightly means-tested grants. The eligibility threshold and cash value of Educational Maintenance Allowance and Welsh Government Learning Grants have fallen significantly in real terms over the past decade and a half.³⁰ In order to remedy these issues the Welsh Government should establish a Learning Allowance as part of the Welsh Benefits System.

The Learning Allowance should be based on the Education Maintenance Allowance but improved to meet the needs of young people trapped in poverty today. The Learning Allowance should include:

- Weekly payments based on the Educational Maintenance Allowance model. The value of the weekly cash support should be based on EMA with its cash value increased to its real terms value in the mid 2000s, increasing both the eligibility threshold and the value of the grant, and thereafter being uprated by inflation.
- Make additional allowances for young people in further education who do not benefit from Free School Meals and free home to school transport (to match support available to young people who attend sixth forms).

- Introduce an Essential Equipment Grant (e.g. for laptops, tools) for young people eligible for EMA so they have access to the same resources as better-off learners.

Children from households that are trapped in poverty who attend primary and secondary schools also face significant barriers to their education.

Growing numbers of families cannot access a nutritious diet because they do not have enough money. Instead, they rely on food banks, fill up on cheap carbohydrates or skip meals altogether. Not having a good diet is a contributory factor in rising levels of obesity and increases the risk of long-term health conditions such as diabetes. Children in low income families are at greatest risk of a poor diet, especially during the school holidays. There is a wealth of evidence demonstrating a link between poor diets on one hand and lower educational attainment on the other.

The cost of attending school can often be a barrier for some of the poorest families in Wales as well. School uniforms are usually compulsory in secondary schools and are often the norm in primary schools, at an average cost of over £200. Parents struggle to meet the cost, despite help provided by the Pupil Deprivation Grant – Access which gives the parents of children entering reception, year 3 year 7 and year 10 a cash grant of £120 (or £150 for a child entering year 7). The cost of school trips, own clothes days and other extracurricular activities can also place an additional barrier to children’s learning.

The provision of cash in lieu of Free School Meals in 17 out of 22 local authorities, and provision of Free School Meals over the summer holidays, showed that the Welsh Government can take action for easing the pressures faced by families. To more effectively link the support provided to children towards the cost of their education however, we believe that the Welsh Government should combine Free School Meals, Healthy Start Vouchers and the Pupil Development Grant Access as a single School Start Fund, as part of its process of establishing a Welsh Benefits System.

In doing so the Welsh Government should:

- Expand eligibility for, take up and value of Free School Meals, Healthy Start Vouchers and the Pupil Development Grant - Access:
 - every child from a low income family (i.e. all families in receipt of Universal Credit whether in or out of work, including families with no recourse to public funds) should receive support;
 - provide Free School Meals and Pupil Development Grant – Access in every school year, including Sixth Form;
 - the value of each support scheme should be sufficient, including enabling secondary school pupils to purchase a filling meal and drink;
 - cash in lieu of free school meals should be available during school holidays;
 - Work towards introducing a free mid-day meal for all school pupils by 2025.

Emergency funding

The Welsh Government’s Discretionary Assistance Fund provides cash and in-kind help in emergencies. Funding has been increased during the pandemic, and between 18th March and 6th August 2020, more than 52,000 emergency payments related to Covid-19 were made with a total value of £3.3 million. However, the fund is not well known, is focused on relatively limited circumstances and is discretionary, not an entitlement.

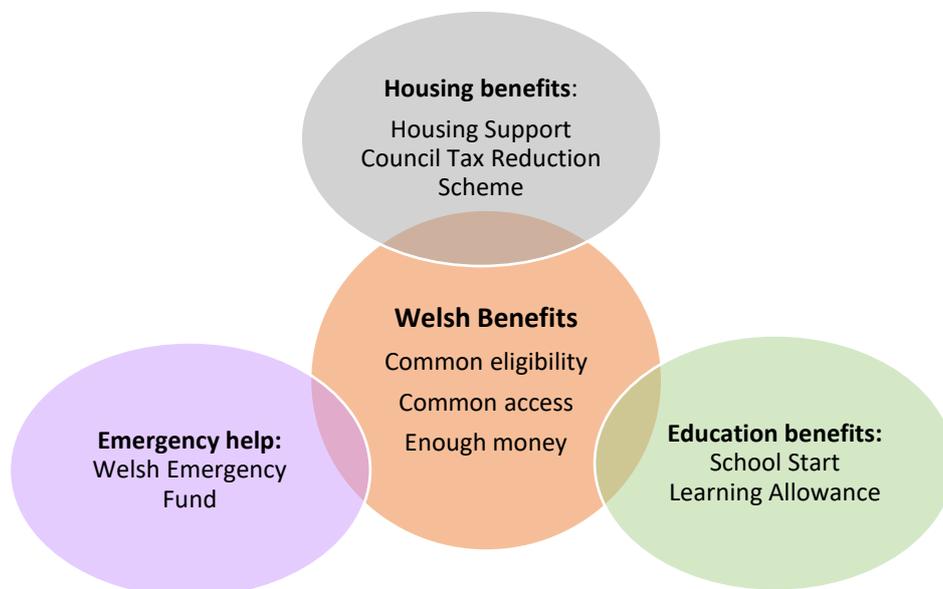
With the numbers of people in severe hardship expected to increase, the Welsh Government should reform the fund to ensure it supports more people with a wider range of urgent needs.

The Welsh Government should replace the Discretionary Assistance Fund with a new Welsh Emergency Fund which would:

- Provide cash help¹ when a household's income falls unexpectedly to substantially below Universal Credit levels and the household has insufficient savings. This might be because of:
 - the 5 week wait for a new Universal Credit claim;
 - a benefit sanction or decision which is being appealed;
 - a benefit error;
 - unpaid wages;
 - bereavement;
 - maternity;
 - other emergency circumstances.
- Provide in-kind help with replacing essential household goods lost through flood, fire, theft or other unexpected circumstances. Current responsibility for providing white goods and floor coverings for new tenants should be transferred to landlords as part of the Welsh Housing Quality Standard and landlord licensing.

The Welsh Benefits System

Based on these recommendations we believe that the key components of a Welsh Benefits System should be based on the following diagram.



¹ e.g. £50 per week per adult for a maximum period e.g. 6 weeks

6. References

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- ¹ More information about the project can be found on the Bevan Foundation's website - https://www.bevanfoundation.org/current-projects/welsh_benefits_system/
- ² Bevan Foundation, *The Case for a Welsh Benefits System*, (5 February 2020) available at - <https://www.bevanfoundation.org/publications/the-case-for-a-welsh-benefits-system/>
- ³ Bevan Foundation, *Back to school? Local variations in help with costs of school meals and school uniforms* (5 September 2020) available at - <https://www.bevanfoundation.org/publications/back-to-school-local-variations-in-help-with-costs-of-school-meals-and-school-uniforms/>
- ⁴ Bevan Foundation, *Learning a living, better support for post 16 learners*, (7 February 2020) available at - <https://www.bevanfoundation.org/publications/learning-a-living-better-support-for-post-16-learners/>
- ⁵ Bevan Foundation, *Solving poverty: Reforming help with housing costs*, (27 May 2020)
- ⁶ Bevan Foundation, *Lifting children out of poverty, the role of the Welsh Benefits System* (30 June 2020)
- ⁷ See section 3 below
- ⁸ UK Government, *Benefit expenditure and caseload tables 2019*, (24 April 2019) Bevan Foundation analysis, available at - <https://www.gov.uk/government/publications/benefit-expenditure-and-caseload-tables-2019>
- ⁹ Welsh Government, *Child Poverty Progress Report 2019, Welsh Government Programmes that are making a difference* (December 2019) available at - <https://gov.wales/sites/default/files/publications/2020-01/child-poverty-strategy-2019-progress-report-annex.pdf>
- ¹⁰ More information on spending can be found in the previous publications from this project.
- ¹¹ Bevan Foundation n(5)
- ¹² Bevan Foundation n(6)
- ¹³ ibid
- ¹⁴ ibid
- ¹⁵ ibid
- ¹⁶ More details in prior publications
- ¹⁷ Bevan Foundation n(4)
- ¹⁸ Bevan Foundation n(6)
- ¹⁹ Bevan Foundation n(5)
- ²⁰ ibid
- ²¹ Bevan Foundation n(6)
- ²² Welsh Government, *Budget 2019/20 Final Main Budget Expenditure Group*, available at - <https://gov.wales/sites/default/files/publications/2020-02/final-budget-2020-2021-megs.pdf>
- ²³ More detailed recommendations available in housing report n(5)
- ²⁴ ibid
- ²⁵ ibid
- ²⁶ ibid
- ²⁷ ibid
- ²⁸ ibid
- ²⁹ ibid
- ³⁰ Bevan Foundation n(4)