

Response ID ANON-7Q9W-2P4W-5

Submitted to Call for Evidence - Education (Holiday Meal Payments) Bill
Submitted on 2026-06-15 11:50:56

Introduction

1 How would you like your response to be published? (Please note: this question requires a response)

I would like my response to be published

2 Are you content that any of your suggestions which have been published to the Committee or the Assembly may inspire the text of an amendment?

Yes

3 What is your name? (Please note: this question requires a response)

Name:
Community Foundation NI

4 What is your email address?

Email:
mmcmahon@communityfoundationni.org

5 Please indicate if you are providing a submission:

On behalf of an organisation or business

If on behalf of an organisation or business, please state its name::
Community Foundation NI

And please tell us briefly how the organisation or business relates to the subject matter of the Bill::

We are the largest independent grant maker in NI, and as detailed in our response have experience of funding numerous programmes to support children's health and wellbeing over summer periods and beyond.

Policy objectives of the Bill

6 Do you agree with the policy objectives of the Bill?

Yes

Please elaborate:

Overall position

We at the Community Foundation for Northern Ireland (CFNI) support the principle and intent of the Bill to address the issue of holiday hunger for families right across the region. We welcome efforts to provide consistent and predictable support to children entitled to Free School Meals (FSM) during school holidays, relieving pressure on families and improving the health and wellbeing of thousands of children and young people each year.

It is important, however, to note that these payments alone will not fully address the complexity of holiday hunger, and that careful design is required to avoid unintended consequences in the delivery of this programme of support.

CFNI's role

CFNI has worked in partnership with a range of funders to deliver support to families across Northern Ireland who are experiencing disadvantage and deprivation. In recent years we've awarded almost £1 million of funding to 25 organisations working to support people experiencing food poverty. One example of this is the Nourish the Nation Summer Food and Activity Fund, which was designed to address food poverty for children in Northern Ireland, particularly during the summer months when there are gaps in food provision. In recent years this has been supported by Sainsbury's in partnership with Comic Relief and focused on providing food and activity schemes to children from pre-school to Year 12. The funding supported a broad range of activities aimed at enriching children's experiences during school holidays including:

- Diversity of meal offerings: While all grantees provided food during activity sessions, the types of meals and the frequency of food provision varied. This included hot meals, snacks, or packaged items.
- Food packs and grab-and-go parcels: These were highlighted as especially beneficial because they allowed more flexibility and reach, providing families with essential food at times and in formats that worked for them, even when they couldn't attend sessions.
- Sporting activities: Encouraging physical health and well-being.
- Arts and crafts: Creative activities that help with emotional and cognitive development.
- Trips out: Providing opportunities for children to experience new places and learn outside the classroom.
- Activities for transitioning children: Specific programs aimed at helping children prepare for attending/ returning to school in September, making the transition smoother.
- Signposting and referrals: Support in helping families access wider support, such as benefits and social services. This holistic approach aimed to address the root causes of poverty, offering not just immediate relief but longer-term solutions for families in need.

In terms of the reach and impact of this work, almost 4,000 children and young people benefitted directly from the summer food and activity programmes, including almost 600 children with disabilities. The majority of participants reported improved access to health food, and many note improvement in their physical health and wellbeing. More than 1,000 people reported receiving emergency supplies through this programme, demonstrating the need for, and value of, support for families facing unanticipated crises and unexpected food insecurity. The learnings from this work have informed the design and delivery of similar schemes this summer, which will be delivered in 19 locations across Northern Ireland.

The Policy Objectives of the Bill - Support with qualifications

The Bill as drafted undoubtedly addresses a clear and evidenced need. We know that one in six (16%) people across Northern Ireland say that they or their household have experienced food insecurity over a 12-month period, equating to an estimated 354,000 people. Engagement with families who have benefitted from CFNI-funded summer scheme support indicates that the loss of FSM provision during school holidays creates acute financial and nutritional pressure on low-income households. Our programmes demonstrate that targeted holiday interventions significantly improve access to food, wellbeing and family resilience. The direct payment scheme proposed by the Bill will undoubtedly contribute to addressing these problems, providing financial support to many who otherwise struggle to make ends meet, particularly during the school holiday periods.

However, as the Committee will understand, holiday hunger is multi-dimensional, linked to poverty, isolation, and wellbeing, and is not simply a question of food access. Our programmes have shown that holistic provision, through which nutritional food is combined with access to activities and broader support, delivers stronger outcomes than food-only interventions. We encourage the Committee to recognise these and support the Department to explore additional mechanisms through which opportunities promoting physical activity, social interaction, community building and emotional wellbeing can also be delivered to those in greatest need.

7 Do you think the provisions of the Bill will be effective in achieving the policy objectives?

Yes

Please elaborate:

We recognise and support the principle of delivering direct payments to eligible families that provide immediate, flexible financial support. The proposed scheme has addressed concerns raised in alternative models, such as voucher schemes, and seeks to minimise any administrative capacity required to facilitate it by aligning with pre-existing entitlements. Such direct payments also permit families to make choices about meals that respect individual preference and cultural differences in a way that is harder when vouchers or in-kind donations are distributed.

However, those payments alone cannot guarantee the nutritional quality of the meals that may be provided, and we would recommend supplementing the payments with practical advice supporting healthy choices and cost-effective meal preparation. Direct payments also miss the opportunity to address social isolation and wellbeing, which holiday scheme programmes have previously supported. Feedback from beneficiaries of previous CFNI-funded schemes showed that the provision of food alongside activities led to combined improvements in diet, health and emotional wellbeing.

Given that payments under this scheme are linked directly to eligibility for FSM, it is important to recognise that research from the Northern Ireland Commissioner for Children and Young People indicates that between 2017 and 2020, 2 in 5 families in poverty were not eligible for FSM. Furthermore, 66% of children eligible for FSM support were not living in poverty. While the Department has made some subsequent changes to the FSM thresholds, these concerns have not been fully addressed, illustrating the need to regularly review and update the criteria to ensure this support is targeted towards those in greatest need.

8 Please note which (if any) of these objectives you consider to be ineffective. List the objectives you feel are ineffective and why.

objectives you consider to be ineffective:

As noted, we agree that this model will be effective in achieving its policy objectives of increasing financial support to families in need.

9 Do you foresee any unintended consequences of any of the policy objectives of the Bill?

Yes

Please elaborate:

We anticipate a number of potential unintended consequences:

- Pressure on Department of Education budgets – we understand that the Department's budget is already facing significant pressures, and without Executive buy-in to ensure appropriate ring-fenced funding is provided to facilitate this scheme, there is a risk that other key initiatives could be undermined. Holiday hunger is a cross-cutting poverty issue, and while we support the Department of Education taking the lead on this programme, addressing poverty is a shared responsibility across government departments and should be funded as such, in line with the spirit of the Children's Services Co-operation Act (Northern Ireland) 2015.
- Cliff-edge inequality – as with all such schemes, there is a risk that families just above the thresholds for FSM will not only miss out on this support but may experience increased hardship with a risk of upward pressure on school meal pricing. If additional funds are required to support the delivery of this scheme, this could drive up the cost of school meals for those who currently pay, which could have a disproportionate impact on those closer to the thresholds. It should also be noted that those thresholds do not take account of potential seasonality in family incomes.
- Low payment adequacy – by linking holiday meal payments to school meal payment rates, which are set centrally and determined on the basis of delivery at scale, this scheme is unlikely to reflect real terms fluctuation in pricing and food-cost inflation.
- Reduced investment in community provision – there is a risk that funding for this scheme will reduce and displace support for holistic programmes that deliver wider outcomes beyond direct food payments.

Clause 1

10 Do you agree to the introduction of a requirement for the Authority to provide a financial payment in lieu of milk, meals or other refreshment for relevant periods, with the requirement applicable to parents of pupils in receipt of free school meals

Other

Please explain your answer:

While we agree with this clause, we recommend that assurances are sought from the Department that eligibility for the scheme will be reviewed as part of their broader work on access to FSM support. In addition, we believe further consideration is required to ensure equity of access for families living in rural areas, who face higher food and transport costs and limited access to affordable retailers. It is important to emphasise, as we know Rural Community Network will have done in their response, that the provision of 'equal' payments may produce unequal outcomes, and what is required is to ensure equitable support recognising the differences in access amongst those experiencing rural isolation in particular.

11 Do you want to make any changes to this clause? If so, what change would you suggest?

No

Please explain your answer:

As outlined above, we recommend amendments that facilitate a mechanism to review payment adequacy and address the concerns around rurality. We also recommend policy-based recognition of the need for continued support for community-based holiday provision and the cross-cutting nature and impacts of food poverty (but do not believe legislative amendments are required to facilitate this).

Clause 2

12 Do you agree with the aims of this clause amend definitions of "the relevant periods" and "the model Disposal of Records Schedule"

Yes

Please explain your answer:

13 Do you want to make any changes to this clause? If so, what change would you suggest?

Other

Please explain your answer:

We would seek an assurance from the Department that they have sufficient powers to ensure this support could be easily extended during a period of emergency closures (such as those seen during the covid pandemic).

Clause 3

14 Do you agree with the aims of this clause

Yes

Please explain your answer:

15 Do you want to propose any changes to this clause? If so, what change would you suggest?

No

Please explain your answer:

Clause 4

16 Do you agree that the Bill will come into operation no later than the next relevant period following Royal Assent?

Yes

Please explain your answer:

17 Do you want to make any changes to this clause? If so, what change would you suggest?

No

Please explain your answer:

To conclude our response, we believe this Bill represents an important and welcome intervention in starting to address the issue of holiday hunger. In order to maximise its impact, it must:

- o Reflect evidence of what works, including learnings from community-based provision
- o Avoid unintended consequences and inequalities
- o Be embedded within a broader, holistic approach to tackling poverty.

We recommend the Committee supports the Bill and seeks to make progress on these related issues throughout this mandate and beyond.