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## **Committee For Education**

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### **Rural Community Network Response to the Call for Evidence: Education (Holiday Meal Payments) Bill**

#### **Introduction**

Rural Community Network (RCN)<sup>i</sup> welcomes the introduction of the Education (Holiday Meal Payments) Bill and supports its objective of reducing food insecurity among children and young people during school holiday periods.

As a regional voluntary organisation supporting rural communities across Northern Ireland, RCN has long highlighted the disproportionate impact of poverty, the cost-of-living crisis and service accessibility challenges on rural households. We therefore recognise the value of providing direct financial support to families who would otherwise lose access to Free School Meals during holiday periods.

RCN supports the principle underpinning the Bill and acknowledges the positive contribution holiday meal payments can make in alleviating immediate financial pressures on low-income families. However, we would encourage the Committee to ensure that both the legislation and its implementation are fully rural proofed and that the impact of the scheme is considered and monitored through a rural lens from the outset.

Our response focuses on four key areas:

- The realities of rural poverty and food insecurity;
- The need for place-based approaches to tackling disadvantage;
- The interaction between eligibility criteria and rural employment patterns;

- The importance of aligning the Bill with wider anti-poverty objectives.

### **Rural Poverty and Food Insecurity**

While poverty is often perceived as an urban issue, evidence consistently demonstrates that poverty in rural areas can be both significant and less visible<sup>ii</sup>.

Rural households frequently face additional costs associated with where they live. These costs are often overlooked in policy design and can have a direct impact on household food security<sup>iii</sup>.

Many rural families experience:

- Higher transport costs<sup>iv</sup>;
- Greater dependence on private vehicles<sup>v</sup>;
- Longer travel distances to major supermarkets<sup>vi</sup>;
- Reduced access to public transport<sup>vii</sup>;
- Greater reliance on smaller local retailers and convenience stores<sup>viii</sup>.

This means that families living in rural areas often face a "rural premium" when purchasing everyday essentials, including food.

The Consumer Council's Rural Routes to Food research highlighted the additional challenges faced by rural consumers in accessing affordable food<sup>ix</sup>. The research found that rural households are often required to travel significantly further to access supermarkets and are more reliant on private transport to do so. These additional transport costs can represent a substantial burden for low-income households.

This has important implications for the proposed holiday meal payment scheme.

While a standardised payment may appear equitable, equal payments do not necessarily deliver equal outcomes.

For example, a family living within walking distance of a large supermarket may be able to maximise the value of a holiday meal payment through access to lower-cost products and greater retail choice. By contrast, a family living in a remote rural area may be dependent on a local convenience store where food prices are higher and lower-cost alternatives are unavailable. In some cases, the cost of travelling to a larger supermarket may offset a proportion of the financial benefit received.

RCN therefore encourages the Committee to consider whether a Rural Needs Assessment has been undertaken and whether the Department has fully considered the differing costs associated with accessing food in rural communities.

The Committee may also wish to explore how the impact of the scheme will be monitored across different geographic areas to ensure that children and families living in rural communities derive equivalent benefit from the policy.

## **The Importance of Place-Based Approaches**

RCN believes that food insecurity cannot be understood solely through the lens of household income.

The causes and experiences of food insecurity are shaped by place.

In many rural communities, food insecurity arises from the interaction between a number of factors, including low income<sup>x</sup>, transport poverty<sup>xi</sup>, service accessibility<sup>xii</sup>, digital exclusion<sup>xiii</sup>, fuel costs<sup>xiv</sup> and limited retail provision<sup>xv</sup>.

A place-based approach recognises that people living in different communities experience poverty in different ways and that effective interventions must account for local circumstances.

This position is supported by research undertaken by Ulster University which developed an "At Risk of Food Poverty Index" for Northern Ireland<sup>xvi</sup>. The study found that modelling food poverty from a place-based perspective is essential because geographic factors significantly influence access to food. The research demonstrated that spatial variations in food affordability, availability and accessibility contribute to differing levels of food poverty risk across Northern Ireland and identified higher concentrations of risk in many rural areas. These findings suggest that policies aimed at reducing food insecurity should consider not only household income but also the local conditions that affect people's ability to obtain affordable and nutritious food.

RCN would therefore encourage the Department to adopt a place-based approach when implementing and evaluating holiday meal payments.

This should include consideration of:

- Accessibility of affordable food retailers;
- Transport costs incurred by families;
- Availability of community support infrastructure;
- Geographic disparities in service provision;
- Differences between remote rural, border rural, connected rural and peri urban.

Such an approach would be consistent with the principles underpinning the Rural Needs Act (Northern Ireland) 2016 and would help ensure that policy outcomes are genuinely equitable rather than simply uniform.

## **Universal Credit and Rural Employment Patterns**

RCN also wishes to raise concerns regarding the interaction between eligibility criteria and the realities of rural employment.

As holiday meal payments are linked to Free School Meal eligibility and Free School Meal eligibility is linked to Universal Credit entitlement, it is important that the Committee considers whether some low-income rural families may be disadvantaged by existing eligibility mechanisms.

Many rural economies are characterised by:

- Self-employment<sup>xvii</sup>;
- Farming and agricultural enterprises<sup>xviii</sup>;
- Seasonal employment<sup>xix</sup>;
- Tourism-related businesses<sup>xx</sup>;
- Portfolio working and multiple income streams<sup>xxi</sup>.

These forms of employment often result in fluctuating incomes throughout the year rather than predictable monthly earnings.

RCN has consistently raised concerns regarding the suitability of aspects of the Universal Credit system for households with variable incomes. While previous Tax Credit arrangements could assess income across a longer period, Universal Credit's monthly assessment structure can create challenges for some self-employed and seasonal workers.

Research commissioned by the Department for Communities and published in December 2024<sup>xxii</sup> examined the experiences of households that did not transition from Tax Credits to Universal Credit and recognised that not all eligible claimants successfully migrated to the new system. This raises important questions about whether some low-income households may fall outside support mechanisms that rely heavily on Universal Credit eligibility.

This concern is reflected in evidence previously gathered by RCN during the Department of Education's Review of Free School Meals and Uniform Grant Eligibility<sup>xxiii</sup>. Respondents highlighted that many families continue to experience financial hardship despite falling outside existing support thresholds. Particular concerns were raised regarding working families, self-employed households and those with fluctuating incomes, whose circumstances may not be adequately captured through systems that rely on fixed income thresholds or monthly income assessments. These issues are particularly relevant in rural areas, where self-employment, farming, seasonal employment and portfolio working remain common features of the local economy.

A key strength of RCN's engagement on Free School Meals was the opportunity to hear directly from school staff, including teachers and principals, who are observing the day-to-day realities faced by children and families. This qualitative, lived experience evidence provided important insight into how financial pressure manifests in school settings and how need can be both hidden and unevenly captured by formal eligibility systems. RCN would therefore encourage the Committee to ensure that similar qualitative evidence is built into the monitoring and evaluation of holiday meal payments, including through engagement with schools. In particular, evaluation should consider whether there are children who are missing out on support, the reasons for this and the impact on their wellbeing and participation.

As holiday meal payments are linked to Free School Meal entitlement, RCN would encourage the Committee to seek assurance from Department for Communities that eligibility arrangements are kept under review and that the Department monitors whether any groups of children experiencing hardship are unintentionally excluded from support.

The Committee may therefore wish to seek assurances that:

- Rural self-employed households are not inadvertently disadvantaged;
- Eligibility criteria adequately capture rural patterns of employment;

- Uptake is monitored geographically to identify any disparities between rural and urban areas.

### **Alignment with Northern Ireland's Anti-Poverty Objectives**

RCN has been actively involved in the development of Northern Ireland's Anti-Poverty Strategy and has consistently advocated for policies that address the structural causes of poverty, particularly within rural communities.

From this perspective, we welcome the Bill as an important measure that can help alleviate immediate hardship experienced by families during school holiday periods.

However, we believe it is important that the legislation is viewed as part of a wider anti-poverty framework rather than as a standalone intervention.

The experience of rural communities demonstrates that food insecurity is rarely an isolated issue. It is often linked to low incomes, insecure employment, fuel poverty, transport poverty, childcare costs, service accessibility and broader geographic inequalities.

Holiday meal payments can play an important role in reducing financial pressure on families, but they cannot by themselves address the underlying causes of poverty.

RCN would therefore encourage the Committee to consider how the implementation and evaluation of this legislation aligns with the wider objectives of the Executive's Anti-Poverty Strategy, particularly in relation to child poverty, food insecurity and rural disadvantage.

### **Supporting Long-Term Solutions to Food Insecurity**

RCN supports measures that provide immediate assistance to families experiencing hardship. However, we also believe that public policy should ultimately aim to reduce the need for emergency interventions.

In this regard, RCN supports the Trussell's ambition to end the need for food banks<sup>xxiv</sup>.

The growth in food bank usage across Northern Ireland demonstrates that too many households continue to struggle to meet essential living costs<sup>xxv</sup>. While food banks provide an invaluable emergency response, they were never intended to become a permanent feature of the social security landscape.

The objective of public policy should be to ensure that individuals and families have sufficient income to afford life's essentials, including food, without needing to rely on emergency support.

Holiday meal payments represent an important intervention that can help alleviate immediate hardship for children and families. However, they should sit alongside broader measures designed to tackle the root causes of poverty, improve household incomes and reduce food insecurity over the longer term.

## **Recommendations**

Rural Community Network supports the objectives of the Education (Holiday Meal Payments) Bill and recommends that the Committee considers the following:

### **1. Rural Proofing**

The Committee should seek assurance that the Department has undertaken appropriate Rural Needs screening and, where necessary, a Rural Needs Impact Assessment in relation to the implementation of holiday meal payments. This should include consideration of the additional costs and barriers faced by rural families in accessing affordable food.

### **2. Monitoring Rural Impact**

The Department should monitor the uptake and impact of holiday meal payments across rural and urban areas to ensure that children and families living in rural communities are benefiting equally from the scheme. Included in this evaluation should be qualitative and lived experience voices of parents and teachers particularly around groups who have failed to meet the threshold and why that might be.

### **3. Consideration of Rural Cost Pressures**

The Committee should seek assurance that the Department has considered evidence regarding the higher costs associated with accessing food in rural areas, including transport costs, travel distances and reliance on local retail provision, when determining the level and operation of payments.

### **4. Review of Eligibility and Access**

The Committee should seek assurance that the Department will keep eligibility arrangements under review and consider any evidence that particular groups of low-income families, including those in rural areas with fluctuating or self-employed incomes, may experience barriers to accessing support.

## **Conclusion**

Rural Community Network welcomes the intention and principles of the Education (Holiday Meal Payments) Bill and supports efforts to ensure that children and young people do not experience increased food insecurity during school holiday periods.

However, we encourage the Committee to ensure that the legislation and its implementation are fully rural proofed.

Particular consideration should be given to:

- The higher costs associated with accessing food in rural areas;
- The differing purchasing power of payments in communities with limited retail choice;
- The impact of transport costs and food accessibility;
- The interaction between eligibility criteria and rural self-employment;
- The importance of place-based approaches to addressing disadvantage;
- The alignment of the Bill with wider anti-poverty objectives and child poverty reduction measures.

As an organisation that has contributed to the development of Northern Ireland's Anti-Poverty Strategy, RCN supports measures that alleviate immediate hardship while also contributing to longer-term poverty reduction. We therefore welcome the Bill's intentions and look forward to seeing a scheme that delivers equitable outcomes for children and families regardless of where they live.

Thank you for the opportunity to respond.

Yours sincerely

Samantha Gallagher

Policy & Research Manager

## References

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<sup>i</sup> [Home - Rural Community Network](#)

<sup>iii</sup> [Key Rural Issues 2025 Publication | Department of Agriculture, Environment and Rural Affairs](#)

<sup>iii</sup> [Rural Routes to Food Report | Consumer Council](#)

<sup>iv</sup> **Ibid** and [Key Rural Issues | Department of Agriculture, Environment and Rural Affairs](#)

<sup>v</sup> [Key Rural Issues 2025 Publication | Department of Agriculture, Environment and Rural Affairs](#)

<sup>vi</sup> [Rural Routes to Food Report | Consumer Council](#)

<sup>vii</sup> [Rural population grows three times faster than urban | Northern Ireland Statistics and Research Agency](#)

<sup>viii</sup> [Rural Routes to Food Report | Consumer Council](#) and [https://neighbourhoodretailer.com/rural-retailers-  
provide-vital-community-support-acsr-report](https://neighbourhoodretailer.com/rural-retailers-provide-vital-community-support-acsr-report)

<sup>ix</sup> [Rural Routes to Food Report | Consumer Council](#)

<sup>x</sup> [Key Rural Issues 2025 Publication | Department of Agriculture, Environment and Rural Affairs](#)

<sup>xi</sup> [Rural Routes to Food Report | Consumer Council](#)

<sup>xii</sup> [Key Rural Issues 2025 Publication | Department of Agriculture, Environment and Rural Affairs](#)

<sup>xiii</sup> **ibid**

<sup>xiv</sup> [nea.org.uk/wp-content/uploads/2023/01/3830\\_NEA\\_Fuel-Poverty-Monitor-Report-2022\\_V2-1.pdf](https://nea.org.uk/wp-content/uploads/2023/01/3830_NEA_Fuel-Poverty-Monitor-Report-2022_V2-1.pdf)

<sup>xv</sup> [Rural Routes to Food Report | Consumer Council](#)

<sup>xvi</sup>

[Mapping rural food poverty The impact of rurality on consumers access to food using an at risk of food poverty index .pdf](#)

<sup>xvii</sup> [Key Rural Issues 2025 Publication | Department of Agriculture, Environment and Rural Affairs](#)

<sup>xviii</sup> [Key Rural Issues 2025 Publication | Department of Agriculture, Environment and Rural Affairs](#) and <https://datavis.nisra.gov.uk/daera/ni-agricultural-census-2025>

<sup>xix</sup> <https://www.daera-ni.gov.uk/publications/statistical-review-ni-agriculture-2007> and [Key Rural Issues 2025 Publication | Department of Agriculture, Environment and Rural Affairs](#)

<sup>xx</sup> [Key Rural Issues publication - 2021 | Department of Agriculture, Environment and Rural Affairs](#)

<sup>xxi</sup> [Key Rural Issues 2025 Publication | Department of Agriculture, Environment and Rural Affairs](#)

<sup>xxii</sup> [Move to UC Tax Credit Research | Department for Communities](#)

<sup>xxiii</sup> [https://www.ruralcommunitynetwork.org/app/uploads/2025/02/Consultation-Response-Review-of-  
Free-School-Meals-and-Uniform-Grant.pdf](https://www.ruralcommunitynetwork.org/app/uploads/2025/02/Consultation-Response-Review-of-Free-School-Meals-and-Uniform-Grant.pdf)

<sup>xxiv</sup> [Ending the need for food banks | Trussell](#)

<sup>xxv</sup> [End of year food bank stats | Trussell](#)