

# Women's Policy Group NI

WPG NI Response to Call for Evidence -  
Education (Holiday Meal Payments) Bill

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**Contact:**

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## **1. Introduction:**

The Women's Policy Group (WPG) is a group of policy experts and practitioners who advocate collectively for women and girls by promoting gender equality through an intersectional feminist lens. We challenge systemic injustice and discrimination affecting women and girls by informing society and influencing policy and law. Our work is informed by women and girls' lived experiences and rooted in international human rights law.

The WPG is made up of women from trade unions, grassroots women's organisations, women's networks, feminist campaigning organisations, LGBTQ+ organisations, migrant groups, support service providers, NGOs, human rights and equality organisations and individuals. Over the years this important network has ensured there is good communication between politicians, policy makers and women's organisations on the ground. The WPG is endorsed as a coalition of expert voices that advocates for women in Northern Ireland on a policy level.

If you have any questions or queries about this response, or would like to discuss this evidence further with the WPG, please contact Elaine Crory, Women's Sector Lobbyist at [elaine.croory@wrda.net](mailto:elaine.croory@wrda.net)

This response was prepared by the following WPG members:

- Elaine Crory – Women's Resource and Development Agency
- Meghan Hoyt - Women's Resource and Development Agency
- Caoímhe McNeill - UNISON
- Aoife Mallon - Ulster University
- Siobhán Harding - Women's Support Network
- Frances Murray - Ulster University

Please note that this response also includes evidence from other WPG work, compiled by a range of WPG members, and not all member organisations have specific policy positions on all the areas covered in this response.

### **1.1 Endorsements**

The WPG would like to endorse the response submitted to this call for evidence by:

- The Women's Regional Consortium & Ulster University

## 2. Past Consultations Responses, Evidence Submissions and Briefings:

The WPG has published a wide range of evidence through various evidence submissions, public consultation responses and specific briefings on issues relating to Holiday Meal Payments. Responses made by the WPG, and some of our members, in relation to these issues include:

- WPG Response to Holiday Hunger Survey (2025)<sup>1</sup>
- WPG Response to Free School Meals and Uniform Grant Eligibility (2025)<sup>2</sup>
- WPG Response to Anti-Poverty Strategy Consultation (2025)<sup>3</sup>
- WRDA Research: The Impact of the Cost of Living Crisis on Women's Health (2024)<sup>4</sup>
- WPG Call for Evidence into the Inadequacy of Social Security (2023)<sup>5</sup>
- Women's Regional Consortium (2023) 'Women's Experience of the Cost of Living in Northern Ireland'<sup>6</sup>
- WPG Covid-19 Feminist Recovery Plan (2021)<sup>7</sup>

### 2.1. Content from previous WPG Responses

*From WRDA Health Inequalities Research: the Impact of the Cost of Living Crisis on Women's Health (2024)*

The Women's Policy Group has consistently stressed the disproportionate impact of poverty on women and its gendered impact, and through our research on Health

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<sup>1</sup> WPG Response to Holiday Hunger Survey( 2025)

<https://static1.squarespace.com/static/66c475c740e7194ba8ee6a81/t/67b5db5248c9274e743684d5/1739971410677/Holiday+Hunger+Survey.pdf>

<sup>2</sup> WPG Response to Free School Meals and Uniform Grant Eligibility (2025)

<https://static1.squarespace.com/static/66c475c740e7194ba8ee6a81/t/67adc4c3e187a61944419b29/1739441347334/WPG+NI+Response+to+Free+School+Meals+and+Uniform+Grant+Eligibility+Consultation.pdf>

<sup>3</sup> WPG Response to Anti-Poverty Strategy Consultation (2025)

<https://static1.squarespace.com/static/66c475c740e7194ba8ee6a81/t/68d114906bd757160ad43695/1758532752881/WPG+Response+to+Anti-Poverty+Strategy+Consultation.pdf>

<sup>4</sup> WRDA Research: The Impact of the Cost of Living Crisis on Women's Health (2024)

<https://static1.squarespace.com/static/66c475c740e7194ba8ee6a81/t/670e4ec37296d232ca200688/1728990916910/Key-Research-Findings.pdf>

<sup>5</sup> WPG Call for Evidence into the Inadequacy of Social Security

<https://static1.squarespace.com/static/66c475c740e7194ba8ee6a81/t/6710e5a1af1b97716eed04f0/1729160610289/WPG-response-APPG-Poverty-Social-Security-Benefits.docx-1.pdf>

<sup>6</sup> Women's Regional Consortium (2023) 'Women's Experience of the Cost of Living in

Northern Ireland <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

<sup>7</sup> WPG Covid-19 Feminist Recovery Plan (2021)

Inequalities, has always stressed that health is particularly impacted by these financial and economic inequalities.

### *Women as 'shock absorbers'*

Research by the Women's Regional Consortium (WRC) in 2023 found that 91% of the women felt that the Cost-of-Living Crisis had impacted their physical or mental health or both. This research also found that in times of financial hardship, women become the 'shock absorbers' of poverty in the household, and will often go without necessities such as food and heat to ensure that their children are protected from the impacts of poverty.

For example, the research found that women routinely missed meals, restricted their household energy use and avoided social activities to prioritise money for their children and families. This research also found that 'shock absorbing' behaviour has significant impacts on women's physical and mental health. In terms of physical health, 89% of women said that increases in food prices had the biggest impact on their household budget, forcing women to buy cheaper, healthier food because they can no longer afford things like fresh fruit and vegetables.

The following quotes from this research report reflect the extent to which strained finances have caused women to opt for cheaper, less healthy food options for their families:

*"We're all eating chicken strips and chips, that's all we eat for 4 days is chicken strips because I can't afford anything else."*

*"Fruit and vegetables are really expensive. You can run into Iceland and grab pizzas for cheaper. You're forced to buy more unhealthy food."*

### **3. General Comments on the Education (Holiday Meal Payments) Bill Consultation**

The WPG would like to begin this consultation with four overarching points:

- 1) **WPG supports this Bill.** It is a necessary mitigation to address the impact of child poverty and the importance of access to healthy, nutritious food. The Hunger Scheme was established during the pandemic and provided essential

support to low-income families. Cutting this program has been criticised,<sup>8</sup> along with broader cuts to the Education Budget. The WPG is glad to see the reinstatement of this programme. We are particularly pleased to see that the Bill recommends direct cash payments to families, which is proven to reduce stigma, improve uptake and provide dignity to recipients.

- 2) **Commitment to Universal Free School Meals.** In previous consultations, WPG has stated that all efforts should be made to provide universal free school meals to all children from nursery to Y14. This view is informed by the work of the Women's Regional Consortium<sup>9</sup> and academic research which draws clear links between food insecurity and educational and mental health outcomes.<sup>10</sup> In line with this position, the WPG also endorses Holiday Meal Payments during all school holidays and exceptional closure days for those in receipt of FWMs. Access to healthy, nutritious meals improves student performance and well-being. The universality of provision both reduces stigma and ensures that any family experiencing difficulties, whatever the reason, will be able to access FSM. Relatedly, universality of provision reduces the chances that children in need will be left out of the scheme due to ineligibility.
- 3) **Northern Ireland experiences significant food poverty.** This Bill is particularly important given the context of poverty in Northern Ireland, where food poverty remains a significant issue. Northern Ireland currently experiences persistent poverty, rising food prices, and an ongoing cost-of-living crisis. Recent statistics indicate that 15% of children (67,000 children) live in relative and absolute poverty before housing costs, with children experiencing the highest poverty rates of any population group. Research conducted by the Women's Regional Consortium and Ulster University found that food insecurity is a major concern

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<sup>8</sup> Fitzpatrick, C. *et al* (2024) 'An Updated Perspective on the Cuts to Education and the Consequences for Children and Young People in Northern Ireland' <https://pure.ulster.ac.uk/en/publications/an-updated-perspective-on-the-cuts-to-education-and-the-consequen#:~:text=We%20concluded%20that%20the%20cuts,beyond%20the%20brink%20of%20collapse.>

<sup>9</sup> Harding, S., Fitzpatrick, C. & Chapman, A. (2023) 'Women's Experiences of the Cost of Living Crisis in Northern Ireland' Available at: <https://www.womensregionalconsortiumni.org.uk/wpcontent/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

<sup>10</sup> Fitzpatrick, C., Loader, R., McCartney, S., McConnell, B., McMullen, J., Murray, C., Orr, K., Purdy, N. & Simms, V. (2023) 'The Consequences of the Cuts to Education for Children and Young People in Northern Ireland' Available at: <https://www.stran.ac.uk/wpcontent/uploads/2023/06/The-Consequences-of-the-Cuts-to-Education-for-Children-andYoung-People-in-Northern-Ireland-Final.pdf>

for low-income families, with 75% of women reporting difficulty paying for food shopping and 89% identifying food bills as the household expense most affected by rising costs.<sup>11</sup> Growing food insecurity is reflected in increasing demand for emergency food aid, with food banks in the Trussell Trust network distributing 90,375 emergency food parcels across Northern Ireland in 2024.<sup>12</sup>

- 4) **The cost of inaction.** The WPG stresses that addressing food poverty should be viewed as an investment rather than a cost. Evidence shows that children growing up in poverty are more likely to experience poorer health, lower educational attainment, and reduced life opportunities, creating significant long-term costs for public services. The Northern Ireland Audit Office estimates that child poverty costs the public purse between £825 million and £1 billion each year, while noting that investment in reducing poverty can generate substantial long-term savings and prevent future harm. Failure to tackle food poverty risks worsening health inequalities, increasing demand on health and social services, and widening educational attainment gaps
  
- 5) **Women are disproportionately impacted by poverty.** The WPG has repeatedly highlighted the importance of recognising the gendered nature of poverty. Women are disproportionately affected by food poverty due to their greater likelihood of living on low incomes, receiving social security benefits, working in low-paid or insecure employment, and providing unpaid care for children and other family members. Research from the Women’s Regional Consortium and Ulster University found that women often act as the “shock absorbers” of poverty, managing household budgets and going without food themselves in order to ensure that children and other family members are fed.<sup>13</sup> This indicates that food poverty is not gender neutral and that women frequently bear the greatest burden of financial hardship within households, often at the expense of their own health and well-being.

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<sup>11</sup> Ibid, n9.

<sup>12</sup> <https://www.trussell.org.uk/our-work/northern-ireland>

<sup>13</sup> Ibid, n9.

#### **4. Response to Consultation Questions**

**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)**

The Women's Policy Group

**4. What is your email address?**

Email: info@wrda.net

**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:***

The Women's Policy Group

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

Yes

***Please elaborate***

The WPG supports the objectives of this Bill, but would like to highlight some areas for further consideration.

- We suggest that the amount of holiday food payments be calculated independently of the cost of free school meals. The Joseph Rowntree Foundation has research on the true cost of feeding a family. This guidance should be used to calculate Holiday Hunger Payments as the cost of free school meals is impacted by economies of scale and government subsidies and may not represent the accurate cost of providing nutritious meals within the family home.

- We suggest that the eligibility criteria for FSMs be revised to ensure children in need are not missing out. Universality of provision is the preferred option.
- We suggest extending the scheme to include exceptional closures and Bank Holidays.

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

Yes

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

The WPG considers these objectives a necessary step to addressing poverty in Northern Ireland. However, we would be keen to see a more cross-departmental approach with other Departments, such as the Department of Health and the Department of Communities, taking responsibility for the success of this scheme.

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

No

***Please elaborate***

This scheme previously existed and was uncontroversial and had cross-community support.

**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**

Yes

***Please explain your answer***

The WPG agrees with the principle of making a payment directly to families in receipt of FSM during holiday periods. However, as previously noted, the WPG would recommend that this payment NOT be tied to the price of school meals, but based on an independent assessment of the true cost of providing meals in the family home.

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

As noted above, the WPG suggests these three amendments:

- We suggest that the amount of holiday food payments be calculated independently of the cost of free school meals. The Joseph Rowntree Foundation has research on the true cost of feeding a family. This guidance should be used to calculate Holiday Hunger Payments as the cost of free school meals is impacted by economies of scale and government subsidies and may not represent the accurate cost of providing nutritious meals within the family home.
- We suggest that the eligibility criteria for FSMs be revised to ensure children in need are not missing out. Universality of provision is the preferred option.
- We suggest extending the scheme to include exceptional closures and Bank Holidays.

**Clause 2**

**12. Do you agree with the aims of this clause to amend the definitions of “the relevant periods” and “the model Disposal of Records Schedule”**

Yes

***Please explain your answer***

The WPG supports the current definition of ‘relevant periods’, but would like to see the legislation extended to cover all school closure days, including staff days and Bank Holidays.

**Clause 3**

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

No

**14. Do you agree with the aims of this clause**

Yes

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

No

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

Yes

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

No

## **5. Additional Comments**

To conclude,

The Holiday Hunger Scheme represents a vital investment in tackling food poverty, child poverty and educational inequality in Northern Ireland. Many families are struggling to afford adequate and nutritious food, particularly during school holiday periods when the financial pressures of feeding children increase significantly. The continuation of direct payments is especially important, as it provides families with dignity, choice and flexibility, allowing them to purchase food that meets their children's individual dietary, cultural and health requirements. A direct payment model also increases accessibility and uptake by reducing stigma and enabling families to make decisions that best reflect their lives.

For women, who disproportionately shoulder responsibility for managing household budgets and often go without food themselves to protect their children from the worst effects of poverty, the scheme provides a crucial source of support. Reinstating and protecting the Holiday Hunger Scheme is therefore not only an effective measure to address immediate food insecurity but also an important step towards reducing poverty, improving health and educational outcomes, and supporting some of the most vulnerable women, children and families across Northern Ireland.

*ENDS*

*For any questions or queries relating to this submission, please contact:*

- Elaine Crory, Women's Sector Lobbyist at WRDA: [elaine.croory@wrda.net](mailto:elaine.croory@wrda.net) or
- Meghan Hoyt, Women's Sector Lobbyist Policy Assistant at WRDA: [meghan.hoyt@wrda.net](mailto:meghan.hoyt@wrda.net)