



Northern Ireland
Assembly

Research and Information Service

Addendum to the Period Products (Free Provision) Bill Paper

January 2022

This paper has been produced as an addendum to the Period Products (Free Provision) Bill Paper by the NI Assembly Research and Information Service (RaISe), and is intended to further inform the Committee for Education in its scrutiny of the Bill.

It contains data requested from the Department of Education NI by RaISe in relation to the Period Dignity Pilot Scheme in Schools, with a particular focus on costs and uptake to date. It expands on information in the RaISe Bill paper which set out the pilot aim, an overview of delivery arrangements, and budgetary allocation.

The addendum concludes with further information sourced in response to Members' queries during RaISe's presentation to the Education Committee on the 16th December 2021.

1 Period Dignity Pilot Scheme in Schools

1.1 Background

In September 2021, the Department of Education (DE) launched a three-year pilot programme to make period products freely available to pupils in primary, secondary, special schools and EOTAS settings¹. The pilot is funded by the NI Executive and is being delivered in partnership with the Education Authority (EA), CCEA, and schools.

1.2 The scope of the pilot

Information from DE² reflects that the scheme has been made available to all schools with female learners including:

- 174 Post Primary;
- 35 Special Schools;
- 788 Primary Schools; and,
- 15 Education Other Than at School (EOTAS) settings.

Furthermore, DE reported that a small amount of budget (£50) has been allocated to 20 'all-boys' schools to ensure products can be made available for female learners attending lessons under the Entitlement Framework. The Department stated that it does not have access to data indicate which of these schools have female pupils attending, therefore, it set up a base budget and advised schools to contact the Department should this be insufficient.

No other settings are currently covered by the scheme, however, the Department indicated that the EA's controlled youth settings may be considered in the future. It is expected that this would not add significantly to the overall cost to the scheme³.

1.3 Pilot Costs

The Department provided RaISE with a breakdown of expected costs for the three year pilot period (across four financial years) as presented at Table 1. It should be noted that the expected total cost of £2.1million to deliver the scheme over the course of three years is less than the previous estimate (£2.6million⁴).

¹Department of Education *McIlveen launches scheme to promote period dignity in schools* [online] Available at: <https://www.education-ni.gov.uk/news/mcilveen-launches-scheme-promote-period-dignity-schools>

² Information provided by the Department of Education via email correspondence, 21st December 2021.

³ Ibid

⁴ Department of Education *McIlveen launches scheme to promote period dignity in schools* [online] Available at: <https://www.education-ni.gov.uk/news/mcilveen-launches-scheme-promote-period-dignity-schools>

Table 1: Period Dignity Pilot Scheme Costs

Costs (£000s)	2021/22	2022/23	2023/24	2024/25 * (Apr-Jun)	Total
Procurement	£60	£0	£0	£0	£60
Launch and embedding of programme	£233	£66+	£66	£20	£385
Cost of period products	£348	£460	£689	£172	£1,669
Total cost	£641	£526+	£755	£192	£2,114

Source: Department of Education. December 2021

1.3.1 Procurement costs

Procurement costs of £60k were incurred this financial year (2021/22). The Department confirmed that a contract has been awarded for the Supply and Delivery of Feminine Hygiene Products for an initial period of 12 months, starting September 2021, with the potential for 4 further 12 month extensions.

1.3.2 Launching and embedding programme costs

A significant investment has been made in the launch and embedding of the scheme, particularly in the first year of the pilot (2021/22). However, information from DE reflects that the anticipated cost for launching and embedding in year 1 is lower than originally anticipated (at £233k compared with £322k previously estimated).

For future years, launch and embedding of the programme costs are as per Table 1 above. However, the Department indicated that it may seek a small amount of additional funding for 2022/23 given this year's reduced requirements. The Department further clarified that "launch and embedding of the programme" costs relate to CCEA's costs to promote and embed the scheme through communications, curriculum materials and teacher professional learning. These costs are not directly linked to the cost of the free products.

1.3.3 Period product costs

Over £1.6 million (or 79%) of the total £2.1 million relates to the cost of period products. The cost of period products at Table 1 is based on a 20% uptake in 2022/23 and 30% from 2023/24 onwards. This is in line with envisaged year-on-year uptake at 15% in year 1, to 20% uptake level in year 2, and 30% in year 3⁵, as per learning from similar initiatives in Scotland and England.

The Department explained that the ongoing annual cost of period products is likely to be in the region of £0.7m per year when uptake reaches 30%, which is the uptake level originally considered feasible once the scheme is embedded. The Department explained that the anticipated ongoing annual cost has been revised based on prices secured through the

⁵ Council for the Curriculum, Examinations and Assessment (September 2021) *Period Dignity Policy and Guidance for Schools*. Belfast: CCEA. Available at: https://ccea.org.uk/downloads/docs/ccea-asset/Resource/Period%20Dignity%20Policy%20and%20Guidance%20for%20Schools_2.pdf

public procurement exercise and the current combination of products being ordered by schools, and is lower than the originally envisaged cost of £0.9m per year.

The formula used by DE for calculating the cost of products is as follows:

$$\text{Number of learners} \times \text{cost per "access"} \times \% \text{ uptake}$$

The DE officials further explained each component as follows⁶:

Number of learners

The number of learners is estimated at 76,585. This is based on all post primary pupils (Years 8 to 14) and 12.5% (3,125) of P6/P7 on the basis that 87.5% pupils do not menstruate until secondary school. An estimated 960 pupils attending Special Schools have also been included.

Cost per “access”

Cost per access was previously estimated at £4, based on typical supermarket prices for two packs of tampons/towels. The Department reported that the estimated cost per access is now likely to be closer to £3 based on:

- the current product mix that schools are ordering;
- assuming 25 individual towels or tampons per period (5 days x 5 changes).

The Department further noted that the maximum cost per access would be £3.75, if schools were to move to 100% environmentally friendly or branded products.

% uptake

% uptake relates to the percentage of learners accessing the scheme for all of their needs over 10 months⁷, including taking products home⁸.

The Department provided cost information based on two scenarios, varying the cost per access and the % uptake as set out in the table below.

Scenario	Learners	Cost per access	Cost per access x 10 months	20% uptake	30% uptake
Cost based on current mix of orders from schools	76,585	£3.00	£30	£459,510	£689,265

⁶ Information provided by the Department of Education via email correspondence, 21st December 2021.

⁷ Ibid

⁸ Council for the Curriculum, Examinations and Assessment (September 2021) *Period Dignity Policy and Guidance for Schools*. Belfast: CCEA. Available at: https://ccea.org.uk/downloads/docs/ccea-asset/Resource/Period%20Dignity%20Policy%20and%20Guidance%20for%20Schools_2.pdf,

Cost based on 100% branded or environmentally friendly products	76,585	£3.75	£37.50	£574,387	£861,581
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The proposed costings above suggest that the short-term costs are likely to be lower than the £0.9M per annum previously anticipated by the Department, particularly in a scenario where costs are based on the current mix of orders from schools. This is notable as the Bill's annual cost of period products in schools was based on information provided in respect of the pilot scheme proposed by the Department of Education, and indicated in the Explanatory and Financial Memorandum at around £2m per annum in the first year and less than £1m per annum subsequently⁹.

1.3.4 Differences between the pilot scheme and the requirements of the Bill

Clause 2 of the Bill provides for free period products in educational settings, including all primary and secondary schools, whether grant-aided or independent, and institutions of further and higher education.

The duties that would apply to the school sector under the Bill are broadly aligned to the arrangements of the Period Dignity Pilot Scheme, however, there are differences. For instance, the DE pilot aims to ensure products are available to menstruating learners when they need them, including taking products home. In contrast, under clause 2(6) of the Bill, schools are required to provide sufficient products for use while on the premises i.e. not to take home/use elsewhere.

Pupils' needs when not on school premises are proposed to be met by the universal scheme to be put in place by the Department of Health under Clause 1. In its response to RaISe, the Department noted that the 30% proposed uptake rate for the pilot scheme does not take account of any universal scheme that may be put in place under the Period Products (Free Provision) Bill. DE further noted that, without knowing the scale or scope of the universal scheme, it could not estimate its impact on the schools' scheme. Furthermore, the DE pilot scheme is for pupils only, however, the Bill proposes to make free period products available to staff and visitors of public service bodies, and as such, provision in educational settings would extend to school staff and visitors.

The Period Dignity Pilot Scheme is available to all grant-aided primary schools, post primary schools, special schools and EOTAS settings. The definition of schools, as proposed by the Bill, is consistent with Article 2(2) of the Education and Libraries (Northern Ireland) Order 1986, and includes all grant-aided and independent schools. Further consideration might be given as to whether EOTAS settings fall under the definition of school as provided for by the Bill. The legislation pertaining to the provision of education in EOTAS settings is contained within Article 86 of the Education (Northern Ireland) Order 1998.

The provisions of the Bill require Departments to designate the public service bodies which are required to provide free period products on their premises. As such, other educational

⁹ Explanatory and Financial Memorandum to the Bill. Available at: <http://www.niassembly.gov.uk/assembly-business/legislation/2017-2022-mandate/non-executive-bill-proposals/period-products/efm---as-introduced/>

settings, including statutory youth settings, may fall within the scope of the Bill. As noted previously, youth settings are not currently covered by the Period Dignity Pilot Scheme, however, the Department indicated that these might be considered in the future.

2 Further information in response to Committee Members' queries

RaISe presented on the Period Products (Free Provision) Bill Paper to the Committee for Education on the 16th December 2021. This section of the paper adds to the information provided in response to some Members' queries.

2.1 Engagement in the Period Dignity School Pilot Scheme

During the RaISe presentation, consideration was given to the uptake for the Period Dignity pilot scheme in light of previous evidence¹⁰ to the Committee about school engagement levels in the initial months of the pilot. Further consideration was given to how uptake to date compares with similar schemes in England and Scotland.

Information provided by DE¹¹ revealed that 31% (322) schools had ordered period products from the pilot scheme launch on 22 September 2021 to the end of November 2021. DE noted that this figure does not provide a robust estimation of demand as the scheme is in its very early stages. A breakdown of engagement by schools is provided below:

	Total schools in sector	Schools placing at least one order	%
Prep	10	0	0%
Primary	779	202	26%
Secondary	144	73	51%
Grammar	73	28	38%
Special	35	19	54%
Total	1,041	322	31%

As noted previously, uptake in the pilot has been defined as the percentage of pupils using the scheme for all their needs throughout the academic year, including taking products home. Expected uptake for the pilot has been based on similar schemes elsewhere, including in England and Scotland. Therefore, it has been estimated that there will be a 15% uptake in the first year, and that this will increase each year as the scheme becomes established. Initial funding for the pilot reflects this 15% uptake level. It is anticipated that, subject to availability, budgets will increase to reflect a 20% uptake level in year 2 and 30% in year 3, as the scheme becomes established.

During the Committee session, consideration was given to the fact that state-funded schools and 16 to 19 education organisations in England are allocated a maximum amount of spend (a 'spend cap') on period products under the Period Products Scheme¹². This amount is based on 35% of the number of learners in the organisation whose legal gender is female and who, based on age, are likely to have started their periods. 35% is an assumed take-up

¹⁰ Committee for Education OFFICIAL REPORT (Hansard) Period Products (Free Provision) Bill: Homeless Period Belfast, 9th December 2021

¹¹ Email correspondence dated 21st December 2021.

¹² [Period Products Scheme Management Information \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

rate, reflecting the fact that not all learners will have a need for products all of the time. In 2020, 76% of secondary schools, 79% of post 16 organisations and 41% of primary schools had ordered products through the scheme¹³.

Whilst the Department of Education provided figures relative to the number of schools accessing the period dignity pilot scheme in Northern Ireland, it stated that data on the numbers of pupils accessing the scheme has not been collected to date. **It is therefore not yet possible to ascertain how the uptake to date compares with forecasted levels.**

2.2 Survey findings related to the accessibility of period products

During the RalSe presentation to Committee, consideration was given to the findings from CCEA's survey of 1,711 pupils in June 2021¹⁴, including that over a quarter of respondents (27.5%) reported difficulty accessing period products. It should be noted that, of the 27.5% of pupils (N=382) who reported difficulty accessing products:

- 83.2% of pupils did not have the period products that they needed with them in school;
- 27.2% reported that they did not have the period products that they needed at home¹⁵;
- 6.5% cited their parent/guardian not being able to afford such products as their reason for a lack of access, whilst 11.8% stated that they themselves could not afford period products¹⁶.

In addition, CCEA's survey of 79 Further Education (FE) college students revealed that over half (60.8%, N=45) of survey respondents had difficulty accessing period products.

Further detail on the findings from CCEA's survey is within the RalSe Period Products (Free Provision) Bill Paper.

2.3 Consideration of the location of period products in schools and public buildings

During the Committee session with RalSe, consideration was given to previous evidence to the Committee that the Bill should specify that period products be made available in the toilets of schools, colleges and other public buildings¹⁷. RalSe was asked how this proposal compares with the Period Products (Free Provision) (Scotland) Act 2021. As noted in response, the Scottish Bill, as initially introduced, held the objective that '*schools, colleges and universities make a range of period products available for free, in their toilets*'. The Policy Memorandum accompanying the Bill further elaborated that:

¹³ <https://educationhub.blog.gov.uk/2021/11/26/how-can-students-access-free-period-products-in-school-or-college/>

¹⁴ Council for the Curriculum, Examinations and Assessment (December 2021) *Period Poverty Survey Findings Report*. Belfast: CCEA. Available at: <https://ccea.org.uk/downloads/docs/ccea-asset/Resource/Period%20Poverty%20Survey%20Findings%20Report.pdf>

¹⁵ Ibid

¹⁶ It should be noted that the RalSe presentation to the Education Committee on 16th December 2021 was based on [an earlier iteration of these findings](#). As such, there is a slight variation in the final responses above and those presented.

¹⁷ Committee for Education OFFICIAL REPORT (Hansard) Period Products (Free Provision) Bill: Homeless Period Belfast, 9th December 2021

Free period products should be made available in every female, gender-neutral, and accessible toilet in buildings regularly accessed by pupils and students. Responses to the consultation highlighted the embarrassment many feel in discussing menstruation and period products and may therefore prevent them from accessing products. It was for this reason that the Bill specifies that products should be made available in appropriate toilets so those that need them can access products discreetly rather than needing to ask for them in a central location such as a reception area¹⁸.

However, the Scottish Government felt that the requirement in the Bill for education providers to make products available in toilets was overly prescriptive and that providers should have the ability to build on existing voluntary arrangements based on local need. Therefore, an amendment was agreed at the Second Stage that introduced a broader duty on meeting the needs of people who menstruate that allows for flexibility of arrangements¹⁹.

2.4 Ensuring consistency in the quality of period products

During the RaSe session with the Committee, a Member asked about best practice guidance regarding the consistent provision of quality period products across establishments. There is limited literature available on this matter. Guidance from existing initiatives predominantly focuses on the importance of ensuring choice in the products available. For instance, the CCEA school guidance²⁰ under the Period Dignity Pilot Scheme suggests that schools should make a range of products and different qualities available, giving students choice about the products they want to use.

The Scottish Government Guidance²¹ refers to the requirement on responsible bodies to provide for a reasonable choice of different period products and notes the necessity to consult on the types of products that people would like to be made available. The guidance states that responsible bodies are not obliged to make particular brands of products available, nor every absorbency of a particular type of product, merely that a reasonable choice should be available. It further states that best practice, and meeting individual needs, in relation to offering reasonable choice would include offering a choice of different sizes and/or absorbencies of single use products and, in relation to local authorities, more than one type of reusable product²².

¹⁸ Period Products (Free Provision) (Scotland) Bill, Policy Memorandum. Available at: <https://www.parliament.scot/-/media/files/legislation/bills/current-bills/period-products-free-provision-scotland-bill/introduced/policy-memorandum-period-products-scotland-bill.pdf>

¹⁹ Scottish Parliament: Local Government and Communities Committee (2020) Official Report - Period Products (Free Provision) (Scotland) Bill: Stage 2, 28th October 2020.

²⁰ Council for the Curriculum, Examinations and Assessment (September 2021) *Period Dignity Policy and Guidance for Schools*. Belfast: CCEA. Available at: https://ccea.org.uk/downloads/docs/ccea-asset/Resource/Period%20Dignity%20Policy%20and%20Guidance%20for%20Schools_2.pdf, Page 17

²¹ Scottish Government (2021) *Period Products (Free Provision) (Scotland) Act 2021: guidance – September 2021* [online] Available at: <https://www.gov.scot/publications/period-products-free-provision-scotland-act-2021-guidance-responsible-bodies-september-2021/documents/>

²² Ibid, page 4