



Northern Ireland  
Assembly

## Research and Information Service Bill Paper

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**PFSU**

# The Education (Holiday Meal Payments) Bill 2026

This Bill Paper aims to support the Northern Ireland Assembly scrutiny of the Education (Holiday Meal Payments) Bill – as introduced on 3 March 2026. It includes context setting information, an overview of the Bill's Clauses that seek to deliver its policy objectives and a Review of Costs that considers key potential “public purse” implications of the introduced Bill with Northern Ireland’s current challenging public finance context.

This information is provided to MLAs in support of their Assembly duties and is not intended to address the specific circumstances of any particular individual. It should not be relied upon as professional legal advice or as a substitute for it.

## Executive Summary

The Education (Holiday Meal Payments) Bill (2026) seeks to address the issue of “holiday hunger” by placing a statutory duty on the Minister of Education to provide direct payments to parents of pupils entitled to Free School Meals (FSM) during all school holiday periods and exceptional closure days. The Bill proposes amendments to the Education and Libraries (Northern Ireland) Order 1986 to enable these payments, and introduces duties on both the Department of Education (DE) and the Education Authority (EA) to maintain accurate records of payments made. The Bill contains four clauses and one schedule, and is designed to replicate the approach taken during the School Holiday Food Grant scheme introduced in 2020.

The Bill is set against a backdrop of rising food insecurity in Northern Ireland. The Trussell Trust distributed over 90,300 emergency food parcels in 2023–24, including more than 60,000 for children - both record highs. Research highlights the wide-ranging impacts of food insecurity on children’s physical, mental, and educational outcomes. Although 90,935 pupils were entitled to FSM in 2024–25, uptake remains around 81%, and evidence suggests stigma may deter some children from accessing meals during term time. A discreet payment system during holidays may therefore increase uptake and reduce stigma.

A public consultation on the Bill’s proposals received 1,136 responses, with high levels of support. Nearly 98% of respondents agreed that holiday payments would alleviate financial pressure on low-income families, and 99% believed the payments would positively impact children’s health and wellbeing. Stakeholder engagement by the Bill sponsor also demonstrated broad support across community, voluntary, and children’s sector organisations. Respondents also expressed strong support for weekly payments and for the previous School Holiday Food Grant scheme (which was funded by the Executive Office and delivered by the Department of Education (DE)).

The Bill would have several “public purse” implications, if enacted as introduced. The Explanatory and Financial Memorandum (EFM) notes that the Bill would require significant annual expenditure by DE, at around £21.9 million on average over the next eight years. Costs would depend on the number of eligible pupils, uptake rates, and the value of payments, which must be

“equivalent to the cost of milk, meals or other refreshment” as provided during term time. Rising school meal production costs and the current financial pressures facing DE - within a wider challenging public finance context - would affect the sustainability of the scheme. The Executive Budget process for 2025/26 highlights substantial departmental pressures, with bids exceeding available funding and those remain in the current financial year (2026/27) for a Budget that still is to be agreed, and beyond.

The Bill makes notable use of delegated powers. Clause 1(F) allows the Department to make regulations determining the value of payments, while Clause 1(G) permits amendment of “relevant periods”, potentially altering the number of holiday payments. Clause 4(4) enables the Department to make incidental and transitional provisions “by order” in connection with commencement. However, the Bill does not specify whether these regulations or orders are subject to affirmative or negative resolution, leaving the level of Assembly scrutiny unclear. Given the potential financial and policy implications of these delegated powers, Members may wish to consider whether additional scrutiny mechanisms are appropriate.

Overall, the Bill aims to address a clearly evidenced social need and enjoys strong public and stakeholder support. However, Members may wish to consider issues relating to affordability, long-term sustainability, the interaction with FSM eligibility criteria, and the absence of defined scrutiny procedures for key regulation-making powers. These factors will be central to assessing the Bill’s deliverability and effectiveness in reducing holiday hunger among children and young people in Northern Ireland.

## Introduction

The Education (Holiday Meal Payments) Bill (the Bill) was introduced on 3 March 2026 by Danny Baker, MLA. The Bill seeks to make provision for direct payments to be made during school holidays to pupils entitled to receive Free School Meals (FSMs). This paper provides an overview of the Bill's Clauses and the policy objectives as set out in the Explanatory and Financial Memorandum (EFM) that accompanied the Bill as introduced.

The Paper also provides a Review of Costs, examining the Bill's "public purse" financial implications of the Bill as stated in that EFM, including those addressed in the EFM, as well as those relating to considering the Bill's proposed use of secondary legislation. It is structured as follows:

1. Background
2. Education (Holiday Meal Payments) Bill Proposals
3. Review of costs
4. Key takeaways.

## 1 Background

The proposed Bill seeks to address "holiday hunger" for children and young people entitled to FSM by ensuring direct payments, in lieu of FSMs, throughout all school holiday periods. If enacted as currently proposed, it would establish two statutory duties:

1. a duty on the Minister of Education to provide money to school aged pupils - the equivalent of the costs for a school meal during school holidays and exceptional closure days; and,
2. a duty on the Department of Education (DE) and the Education Authority (EA) to keep full and accurate records of how they support children by ensuring access to free school meal direct payments.

Sufficient access to nutritiously adequate food is recognised as a basic human right, yet there are many low-income families in the United Kingdom who struggle to get enough food and are classified as food insecure.

Data on food insecurity in the UK varies across sources, however, similar trends can be observed, including that single parents, and families with children, are some of the groups most likely to be at risk of food insecurity.

The Trussell Trust distributed over 90,300 emergency food parcels in Northern Ireland between 1 April 2023 and 31 March 2024; the highest number of parcels that the network in Northern Ireland has ever distributed and an 11% increase on 2022-23 levels<sup>1</sup>. Over 60,000 parcels were provided for children in this period; a record level of need. Northern Ireland experienced the largest percentage increase in the distribution of emergency food parcels between 2018-19 and 2023-24 (143%) when compared with the UK as a whole (94%). Growth in need in Northern Ireland is higher for children, with the number of parcels distributed increasing by 151% over the five-year period between 2018-19 and 2023-24.

A significant body of research indicates that the consequences of food insecurity on children's lives are wide ranging – including adverse impacts on mental, physical and academic development.

Children who experience food insecurity are also likely to experience holiday hunger – whereby children fall into a nutritional and calorie deficit during the school holidays.

Holiday hunger is most likely to affect children who are entitled to FSM. However, there is also a risk of holiday hunger for children who are not eligible for FSM but whose parents are on low incomes and may not be able to absorb the additional costs of the summer holidays, including increased childcare costs, the loss of low cost school meals and back to school expenses.

Data from the DE indicates that across all grant-aided schools, 90,935 (26%) pupils were entitled to FSMs in 2025-26, a slight decrease compared with 2022-23 (28%)<sup>2</sup>. Analysis by NISRA to inform the Department for Communities (DfC)

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<sup>1</sup> [Trussell Northern Ireland](#)

<sup>2</sup> [DE Education Statistics Dashboard 202425.pdf](#)

Anti-Poverty Strategy revealed that less than a third of children in poverty are in receipt of FSM<sup>3</sup>.

The uptake for FSM by eligible pupils was 80.8%. Data from DE notes that historically the uptake of FSMs is around 80%<sup>4</sup>. There is a range of research that suggests that stigma may prevent children from accessing their FSMs and that children have experienced bullying because they were getting FSMs<sup>5</sup>. The provision of a discreet payment during the holiday period may reduce the stigma and therefore increase uptake of the entitlement. This should be considered in relation to how effective the Bill maybe but also in relation to the cost to implement the Bill, as will be discussed further in the following section.

In July 2025, the Education Minister announced an increase to the income threshold that applies to FSM and the school uniform grant. *From the 2025/2026 academic year, the threshold for families in receipt of Universal Credit, applying for free school meals and uniform grants, will rise from £15,000 to £15,390*<sup>6</sup>.

In July 2020 the Department of Education (DE) introduced the School Holiday Food Grant (SHFG), scheme which provided a payment of £27 per child, per fortnight directly to parents of children who were entitled to free school meals<sup>7</sup>. The Bill proposes a similar process to the previous SHFG scheme which was established during the Covid 19 epidemic and associated lockdowns, with

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<sup>3</sup> Anti-Poverty Strategy Co-Design Group, [Recommendations on the Development of an Anti-Poverty Strategy for Northern Ireland - A Position Paper from Members of the Anti-Poverty Strategy Co-Design Group](#) (2022)

<sup>4</sup> [School Meals in Northern Ireland 2024-25](#)

<sup>5</sup> For example see: [Children Reject Free School Meals Because of Stigma | IRIS](#)

<sup>6</sup> [Education Minister supports households by raising Free School Meals and Uniform Grant threshold | Department of Education](#)

<sup>7</sup> [NI Audit Office Report - Overview of the NI Executive's response to the Covid-19 pandemic \(3rd Report\).pdf](#)

funding from the Northern Ireland Executive. Payments were made direct to bank accounts, by cheque or by Aspen card<sup>8</sup>.

The Northern Ireland Executive funded the SHFG scheme and data provided by DE shows that around £20 million was provided in each year of the scheme. This scheme ended in April 2023 when executive funding came to an end<sup>9</sup>. There are currently no government initiatives in Northern Ireland to address holiday hunger.

### 1.1 Benefits and limitations of holiday hunger initiatives

There have been limited evaluations of the impact of food provision during holidays on food insecurity, but there is some evidence to suggest holiday programmes can make a difference<sup>10</sup>.

During its inquiry into holiday hunger, the All Party Parliamentary Group on Hunger (APPG) found that children who attended free meal and fun projects during the school holidays ate more healthily, undertook more exercise, demonstrated better behaviour, and returned to school in a much improved condition than they would have in the absence of those projects.<sup>11</sup> Positive outcomes were also identified from Children in Northern Ireland's (CiNI) 2019 Summer Holiday Provision including reduction in learning loss and enhanced skills<sup>12</sup>. The CiNI programme also showed a positive influence on children's nutritional intake, demonstrated through children eating fewer unhealthy foods on the days they attended club compared to non-attending days<sup>13</sup>. Other

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<sup>8</sup> An Aspen Card is a government issued, pre-loaded debit card, that can be used to buy essential items such as food, clothing and toiletries. Aspen cards were used during the previous holiday hunger scheme for families who did not have bank accounts.

<sup>9</sup> [Equality and Human Rights policy screening for discontinuation of School Holiday Food Grant \(SHFG\) payment scheme at the end of 2022/23 financial year | Department of Education](#)

<sup>10</sup> S Chambers, K Machray, and G Fergie., '[Food insecurity in children and young people in Scotland.](#)' *Proceedings of the Nutrition Society* (2024) p1-13

<sup>11</sup> A Forsey, [Hungry Holidays. A report on hunger amongst children during school holidays. All-Party Parliamentary Group on Hunger](#) (2017)

<sup>12</sup> Children in Northern Ireland, [Holiday Hunger Executive Summary - Overview of an Evaluation of Children in Northern Ireland's Summer Holiday Provision during 2019](#)

<sup>13</sup> As cited immediately above

research and evaluation studies shows that focused interventions can reduce the challenges that families with low incomes face during holidays, and that holiday clubs play a crucial role in reducing food insecurity and providing food-related enriching activities during the school holidays<sup>14</sup>.

However, others have noted limited evaluation of the impact of holiday hunger programmes on food insecurity<sup>15</sup>. For instance, although there have been annual evaluations of the HAF programme in England, it is noted that these have focused on outcomes such as nutrition, health behaviours and educational outcomes, but not measured the impact on food insecurity. Researchers have suggested that “much more work is required to understand the extent to which holiday programmes can address food insecurity, or whether programmes that provide families with transfers of money are more effective”<sup>16</sup>.

## 1.2 Strategic Context

The Bill is consistent with other Executive aims and policies, for example:

- The Programme for Government (2024-2027): focuses on improving health and well-being and includes commitments to reduce inequalities, improve health and educational outcomes and “*give our children and young people the best start in life*”.
- Draft Anti-Poverty Strategy (2025 -2035): identifies children as one of the groups most affected by poverty in Northern Ireland. It states that the Strategy will “address poverty and the impacts of socio-economic disadvantage” through a coordinated Executive approach.
- Children and young people strategy (2020-2030): notes that social disadvantage has the single greatest impact on educational achievement and sets out a number of actions, including:

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<sup>14</sup> K Cox, D Campbell-Jack and R Blades, [Evaluation of the 2021 holiday activities and food programme](#) (2022) p12

<sup>15</sup> S Chambers, K Machray, and G Fergie., [‘Food insecurity in children and young people in Scotland.’ Proceedings of the Nutrition Society](#) (2024) p1-13

<sup>16</sup> S Chambers, K Machray, and G Fergie., [‘Food insecurity in children and young people in Scotland’.](#) *Proceedings of the Nutrition Society* (2024) p1-13

- *“We will undertake a range of actions aimed at tackling educational disadvantage as outlined above, including intervention programmes designed to support those most in need*
- *We will work collaboratively across departments and agencies towards achieving the outcome in the Child Poverty Strategy that ‘Children in poverty learn and achieve’<sup>17</sup>.*

Therefore, the Bill is broadly consistent with existing Executive strategies aimed at reducing poverty and improving outcomes for children and young people.”

## 2 Education (Holiday Meal Payments) Bill Proposals

This section sets out the purpose of the Bill and a summary of the consultation on the policy proposals that preceded the Bill’s introduction.

The Bill, if enacted, would modify the Education and Libraries (Northern Ireland) Order 1986, to allow payments to be made to parents of pupils who are eligible for free school meals, in lieu of milk, meals or other refreshments.

As set out in the Education Authority (EA) guidance for school meal provision on the Provisions of Articles 58 and 59 of the Education & Libraries (Northern Ireland) Order 1986:

*“The Authority shall have available on every school day items of food adequate in quantity and quality which constitute a nutritionally balanced meal suitable as the main meal of the day for day pupils who are entitled to a free meal<sup>18</sup>.”*

The EA guidance also highlights that the entitlement to FSMs is:

*“A pupil shall be entitled to free school meals where:*

- i. the pupil or parent is in receipt of Universal Credit and has net earnings not exceeding an amount as determined by the Department; or*

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<sup>17</sup> [final-executive-children-and-young-people's-strategy-2020-2030](#)

<sup>18</sup> [EA Arrangements for the Provision of Milk, Meals and Related Facilities - June 2025.pdf](#)

- ii. *the pupil or parent is in receipt of Income Support or Income based Jobseeker's Allowance or Income related Employment and Support Allowance; or*
- iii. *the parent receives the Guarantee element of State Pension Credit; or*
- iv. *the pupil has a statement of special educational needs and is designated to require a special diet; or*
- v. *the pupil is a boarder at a special school; or*
- vi. *the pupil is the child of an asylum seeker supported by the Home Office National Asylum Support Service (NASS)<sup>1</sup>; or*
- vii. *if none of the above apply and a child presents at school hungry, then the school should, on humanitarian grounds, provide free school meals to the child. This initial decision, taken by the school at the point of need, must be followed immediately with a referral to the Education Authority's Education Welfare Service (EWS). The school should continue to provide free school meals while the EWS is carrying out its assessment<sup>19</sup>.*

The Bill, if enacted as introduced, would also require the Education Authority to maintain records of payments.

### **2.1.1 Consultation**

A consultation on the proposed Bill was held between 12 November 2024 and 18 February 2025<sup>20</sup>. That consultation received 1,136 responses, including written responses from:

- UNISON
- The Women's Policy Group; and
- The Human Rights Commission.

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<sup>19</sup> [VG Arrangements for the Provision of Milk Meals and Related Facilities - July 2025.pdf](#)

<sup>20</sup> [Holiday-Hunger-PMB-Consultation-Summary-of-Responses.docx](#)

In addition to this the Bill Sponsor (Danny Baker, MLA) had direct engagement with a range of relevant stakeholders to garner their opinions on the proposed Bill, including:

- The Community Foundation
- Homeless Connect
- Barnardo's
- Save the Children
- Children in Northern Ireland
- Northern Ireland Commissioner for Children and Young People
- West Belfast Partnership Board; and
- School Principals and Teachers.

Although, the report on the consultation responses notes high levels of support for the Bill and that providing support for meals during the school holidays is an important element of addressing child poverty, it does not state how many individuals were engaged with at this stage of the consultation.

The consultation report notes high levels of agreement amongst respondents, on several key points, mainly:

- Free school meal support over school holidays would alleviate some financial pressure experienced by low-income families (98%)
- Greater food security would have a positive impact on the physical and mental health of children and young people (99%); and
- Legislation should be developed to address holiday hunger by ensuring that children and young people who are eligible for FSMs should have this entitlement, or payment in lieu of this entitlement, extended to cover school holiday periods (96%).

The report goes on to note that, of those respondents who agreed with the proposed scheme to provide payments in lieu of FSMs during the school holidays, the majority (77%) thought that payments should be made on a weekly basis. High levels of support (87%) for the previous School Holiday Food Grant Scheme were also noted.

## 2.2 Review of Clauses

### 2.2.1 Clause 1: Modification of the Education and Libraries (Northern Ireland) Order 1986

This clause is the core focus of the Bill and its key function is to facilitate the amendment of Article 58 of the 1986 order to facilitate the financial payments in lieu of school meals. Specifically it notes:

*“1 (c) The Authority shall, in accordance with arrangements approved by the Department, make the financial payment to an eligible parent under Article 58(1B) by means of a payment to a bank account nominated by that parent. (1D) The financial payment shall be equivalent to the cost of milk, meals or other refreshment a category of parent not eligible under Article 58.*

*(1B) would pay in respect of a pupil during school attendance times as published by the Authority from time to time, subject to any exercise of the power in (1F)”.*

As noted in the EFM this clause places a statutory duty on the Department of Education to make a regular payment during school holidays to the parents of eligible school aged pupils. Another important aspect of this clause (as set out in 1 (D) is use of the phrase *“shall be equivalent to the cost of milk, meals or other refreshment category”*.

Therefore, should the cost of FSMs increase, so will the school holiday meal payments.

Regulations are also noted under Clause that provide the Department with the authority to alter amount of the financial payments and also the definition of relevant periods, which could potentially alter the number of payments to be made, specifically:

*“(1F) The Department may make regulations to determine the financial payment payable under article 58(1A) in accordance with Article 58(1D).*

*(1G) The Department may make regulations to amend the definition of “the relevant periods”.*

It is not clear if these regulations are affirmative or negative resolutions, therefore the level of scrutiny that will be afforded is not specified.

## 2.3 Clause 2 Consequential Amendments

This short clause provides an explanation in relation to the disposal of records within schools and also clarifies “relevant periods”, emphasising that the payments would cover “ *Summer, Halloween, Christmas, mid-term and Easter school holidays*”.

However, as noted above, Clause 1 (G), would give the Department the authority to amend the “*relevant periods*”. As set out in the EFM, this is regarded as a “Henry VIII” power<sup>21</sup> and enables the Department to alter the definition of “relevant periods” through secondary legislation, which would be subject to a lower level of Assembly scrutiny.

### 2.3.1 Clause 3: Interpretation

Clause 3 is also very short and clarifies that the 1986 Order refers to the Education and Libraries (Northern Ireland ) Order 1986.

### 2.3.2 Clause 4: Short Title and Commencement

The final clause of the Bill (4 (4)) states:

*“The Department of Education may by order make incidental, supplementary, transitional, transitory and saving provision in connection with the coming into operation of any provision of this act.”*

This clause gives the Department a delegated power to make an *Order* dealing with the practical and administrative matters needed when the Act comes into force. These powers are limited to supporting implementation - they do not allow the Department to alter the core policy or substantive provisions of the Act.

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<sup>21</sup> Henry VIII clauses are clauses in a bill that enable ministers to amend or repeal provision in an Act of Parliament using secondary legislation, which is subject to lesser degrees of scrutiny than primary legislation. [Henry VIII clauses - UK Parliament](#)

However, the clause does not specify whether such an Order is subject to affirmative or negative resolution in the Assembly. Without that information, it is unclear what level of Assembly scrutiny will apply to any Order made under this power.

**Potential Scrutiny Points:**

1. 1(F) states that the “*Department may make regulations to determine the financial payment payable...*”. Members may wish to consider which form of resolution is most appropriate given the potential impacts on benefits and costs of any amendments.
2. 1(G) states that the “*Department may make regulations to amend relevant periods*”, members may wish to consider which form of resolution is most appropriate given the potential impacts on benefits and costs of any amendments.
3. Data from DE indicates that approximately 80% of children who are eligible for FSMs actually take them. Members may wish to consider if families who do not access FSMs during term-time will still be able to access the payments during holidays?

Members should be aware that under the Bill (as introduced) only pupils who are entitled to FSMs will be eligible for payments. Any changes to FSM entitlement will have an onward impact on the school holiday meal payments.

### 3 Review of Bill costs

This section considers key potential financial implications for the “public purse” arising from the Education (Holiday Meal Payments) Bill (Bill 27/22-27), as introduced into the Assembly. Before examining those implications directly, it first addresses the persistently challenging budgetary context at both

central and devolved government levels for 2025/26 and beyond – the context in which the Assembly, including the Committee for Education, considers the introduced Bill. Thereafter, it examines key estimated costs associated with the introduced Bill. Included throughout are potential scrutiny points in blue boxes, which Members, including those in the Committee for Education, may wish to draw on. When relying on this section, please note:

- Identified key potential public purse implications are not intended to be exhaustive.
- Any discussion of prevailing law or existing legislation is not intended to provide legal advice or opinion, but rather to orient the financial analysis.

### 3.1 Financial and budgetary context

Below provides some essential context-setting: initially, the term “public purse” is defined in **Insights Box 1**, followed by an overview summarising the challenging budgetary environment within which the DE is currently operating:

#### **Insights Box 1: Definition of the “public purse”**

The term public purse refers to taxpayers’ money raised through taxation and other sources of government revenue. Government departments in Northern Ireland are custodians of the public purse and designated Accounting Officers are required to ensure that Minister(s) and their departments appreciate “the need for efficiency, economy, effectiveness and prudence in the administration of public resources, to secure value for public money”<sup>22</sup> in accordance with public financial management principles<sup>23</sup>.

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<sup>22</sup> Department of Finance (2023). *Managing Public Money Northern Ireland*, paragraph 2.4.2, page 20.

<sup>23</sup> The standards expected of Accounting Officer’s organisations and wider ministerial and departmental responsibilities and duties expected in relation to the management of public funds are outlined in the *Managing Public Money Northern Ireland* policy, published by the Department of Finance in November 2023. The Accounting Officer, acting within the authority of the Minister(s) to whom they are responsible, must ensure the organisation meets the standards set out in this policy.

In Northern Ireland, the public purse encompasses the Northern Ireland Block Grant from His Majesty's (HM) Treasury; revenues raised regionally; and other funding sources. The Northern Ireland Executive is responsible for allocating those monies through the Executive Budget, which it is to do so in line with the financial arrangements under current devolution, including requirements specified in the [Budget Sustainability Plan](#) and the accompanying [Budget Improvement Plan Roadmap](#), which aim to improve Northern Ireland's public finances, while seeking to balance numerous competing priorities and demands for limited available funding.

If the Bill would be enacted as introduced and receive Royal Assent, then the DE would be responsible for covering costs arising when implementing the Bill, including the specified statutory duties. At the given time, the DE would do so using its budget and/or seeking additional monies from the Executive.

The central and devolved budgetary contexts remain challenging across the United Kingdom, due to a number of contributory factors that are relevant to Members, including the Committee's consideration of this Bill, which are detailed in Appendix 1 to this Paper. That context informed the Draft Budget 2026-2029/30 published by the Finance Minister<sup>24</sup> on 6 January 2026, following no agreement amongst the Executive, and continues to inform decision-making at devolved government level. **Table 1** sets out the Draft Budget's proposed DE allocations:

**Table 1: Proposed DE Budget outcome, 2026-29, £ millions**

	2026-27	2027-28	2028-29	2029-30
Resource DEL	3,244.6	3,313.0	3,393.1	N/A
Capital DEL	355.2	283.7	291.4	290.9
<b>Total</b>	<b>3,599.8</b>	<b>3,596.7</b>	<b>3,684.5</b>	<b>290.9</b>

Source: DoF, [Draft Budget 2026-2029/30](#), published 6 January 2026.

<sup>24</sup> For discussion on the draft budget please see: [Research Publications | Northern Ireland Assembly](#)

In January 2026, the Education Minister unambiguously responded to the Finance Minister's Draft Budget 2026-2029/30, stating it presented "devasting cuts". In a Written Statement to the Assembly, he indicated the DE would be required to save approximately £826 million in 2026-27, £1.01 billion in 2027-28 and £1.15 billion in 2028-29, as outlined in **Table 1** above. The Minister characterised those required savings as "simply not achievable"<sup>25</sup>. All relevant considerations when assessing key potential public purse implications for the introduced Bill, as considered below at sub-section 3.2.

Note, the "reserve claim"<sup>26</sup> of £400 million agreed by His Majesty's (HM) Treasury in February 2026 and £390 million of additional Barnett consequentials detailed in **Appendix 1** to this Paper jointly provide some partial mitigation in this regard. Of the reserve claim sum, £214.6 million has been allocated to the DE. However, that total allocation addresses pre-existing DE pressures rather than creating new headroom for the Department. DE's overall position therefore remains acutely constrained for the foreseeable future.

In February 2026, the Education Minister issued a five year DE Budget Strategy commenting on the inadequacy of the Finance Minister's proposed DE allocation:

*The Department of Education's 2025-2026 budget is £3.36 billion, more than £250 million short of what is needed. Based on projected budget allocations, the gap between funding available and spending forecasts widens dramatically to over £0.8 billion by 2026-27 and over £1.15 billion by 2028-29<sup>27</sup>.*

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<sup>25</sup> [Written Statement](#) to the Assembly by the Education Minister on 6 January 2025.

<sup>26</sup> A "reserve claim" is a mechanism under the [Statement of Funding Policy](#) – published by HM Treasury – whereby a devolved government may request additional in-year funding from HM Treasury's central reserve when it faces exceptional pressures that cannot be met from its existing block grant. The most recent Statement of Funding policy framework was updated and published in June 2025. The relevant reserve claim was confirmed by HM Treasury on 11 February; see Department of Finance [Written Statement](#), 11 February 2026.

<sup>27</sup> [Microsoft Word - DE-Five-Year-Budget-Strategy-4-2-26](#)

The consultation document on the education budget strategy highlights this funding gap:

2025-2026 £m	2026-2027 £m	2027-2028 £m	2028-2029 £m
252	826	1,010	1,150

Source [DE-Five-Year-Budget-Strategy-4-2-26](#)

It notes that due to financial pressures many non-statutory programmes have been cut, including the previous Holiday Hunger Programme, a highlighted below:

*“There have already been repeated rounds of spending reductions, but the core structural pressures on the education budget have not been resolved. Over recent years, a wide range of non-statutory programmes, such as Holiday Hunger, Engage, Healthy Happy Minds, funding for Curriculum Support organisations and Home-to-School Link, have been cancelled. All but essential maintenance has been deferred and school meal prices increased. Even after these difficult and unwelcome measures, the underlying funding crisis remains”<sup>28</sup>.*

### 3.2 Public Purse Implications of the Bill

The following paragraphs consider the specific public purse implications of the Bill in distinct areas – namely: the payments themselves, the anticipated staffing needs to administer the payments and, general DE budget considerations. It does so, drawing on the following sources: key individual Bill provisions; the Bill’s accompanying EFM; data from the Education Authority relating to school meal costs and Northern Ireland Statistics and Research Agency (NISRA) data relating to the school population and population projections.

When relying on this sub-section, please note:

- Identified potential public purse implications are not intended to provide an exhaustive list.

<sup>28</sup> [DE-Five-Year-Budget-Strategy-4-2-26](#)

- Discussions around potential costs are informed by available information at the time of writing.

The Bill's EFM noted that the cost of the Bill would be in the region of £21.9 million annually, based on 70 school holiday days and school meal costs of:

- Nursery - £3.00
- Primary - £3.10
- Post Primary - £3.34; and
- Special - £3.10.

The EFM notes that based on DE data, the cost to administer those payments would be an average of £40,000 per year over the next nine years. This is based on the costs to administer the previous School Holiday Food Grant and an rate of 3.5% which is recommended by [His Majesty's Treasury](#), Green Book guidance<sup>29</sup> on business cases and economic appraisals.

The following table summarises the Bill's potential costs to the public purse, if implemented as introduced, based on EA school meal costs, NISRA school population projections and an inflation rate of 3.5%, it also assumes an uptake of 100%.

**Table 2: Key indicative public purse costs of the Bill (2026 - 2034)**

Year	Meal Payment Costs	Admin Costs	Total
<b>2025/26</b>	20,202,752	34,155	20,236,907
<b>2026/27</b>	20,629,605	35,350	20,664,955
<b>2027/28</b>	21,022,007	36,588	21,058,595
<b>2028/29</b>	21,393,390	37,868	21,431,259
<b>2029/30</b>	21,766,655	39,194	21,805,848
<b>2030/31</b>	22,141,735	40,565	22,182,301
<b>2031/32</b>	22,513,218	41,985	22,555,204
<b>2032/33</b>	22,871,933	43,455	22,915,388
<b>2033/34</b>	23,243,320	44,976	23,288,296
<b>TOTAL</b>	<b>195,784,617</b>	<b>354,136</b>	<b>196,138,753</b>

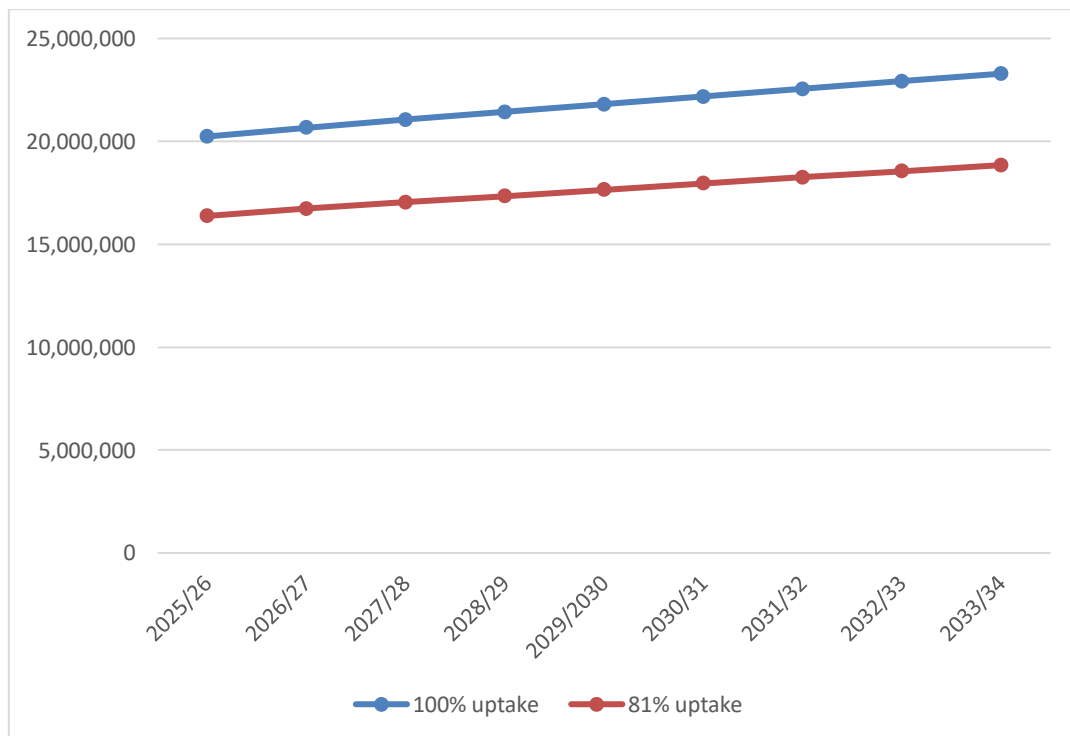
Sources: EA School Meal Costs, NISRA, DE correspondence dated November 2025 to RaISe

<sup>29</sup> [The Green Book and accompanying guidance - GOV.UK](#)

DE data from also shows that in 2024/ 25 the average rate of FSM uptake across all school types was 80.9%<sup>30</sup>.

Should uptake continue at that rate, potential costs from 2025/26 to 2033/34 could be in the region of £176,382,101. The following chart at Figure 1 estimates key potential financial implications for the public purse, assuming a 100% FSM uptake and at 80.9%.

**Figure 1: Key indicative potential public purse costs of the Bill (2026 - 2034), by 100% and 81% uptake rates.**



Sources: EA School Meal Costs, NISRA, and DE correspondence to RaISe November 2025

Therefore, based on the assumptions detailed in the above paragraphs, the average annual potential cost of the proposed Bill is in region of £21.79 million up to 2033/34 at 100% uptake and, £17.64 million at 80.9% uptake, over the next nine years.

<sup>30</sup> [School Meals Tables for 2024\\_25\\_0.xlsx](#)

A number of factors could impact the actual public purse costs, if the Bill enacted as introduced, including:

- **The proportion of children who are eligible for FSMs:** if the rate of children who are eligible for FSMs increases or decreases this will have a corresponding impact on costs. A number of factors could indirectly including changes in policy relating to eligibility, changes in the Northern Ireland economy meaning a weakening or strengthening economy could impact on the number of children eligible for FSMs without any changes to entitlement thresholds.
- **The school population.** The DE school population projections indicate that the number of school aged children is set to decline over the next eight years from 353,499 (2024/25) to 310,325 (2033/34)<sup>31</sup>.
- **Changes to the cost of school meals:** The EFM notes that the current cost of school meals is £3.00 (nursery schools), £3.10 (primary schools), £3.34 (post primary schools) and £3.10 (special schools). A paper from DE noted that whilst the EA increased the price of school meals in January 2026, the cost to produce them continues to rise and the school meals service is operating at a substantial loss, it highlights that:

*“Without reform, rising costs and systemic inefficiencies will result in the overall expenditure on school meals continuing to increase, putting the long-term sustainability of the service at risk<sup>32</sup>.”*
- **Inflation.** The EFM notes that in order to estimate the cost of implementing the Bill, over the next eight years an inflation rate of 3.5% has been applied for that period. This inflation rate is appropriate and is consistent with HM Treasury Green Book guidance<sup>33</sup> on business cases and economic appraisals. However, real inflation rates can vary, for example official data from the Consumer Price Index (CPI) notes that the average inflation from February 2020 to February 2026 was 4.3%,

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<sup>31</sup> [School Meals in Northern Ireland 2020-21](#)

<sup>32</sup> [School meals | Department of Education](#)

<sup>33</sup> [The Green Book and accompanying guidance - GOV.UK](#)

peaking at 11.1% in October 2022<sup>34</sup>. That highlights the impact that external economic factors can have on the cost to provide services, such as FSMs.

- **Other policy changes indirectly impacting FSM entitlement:** A number of economic policies could also impact on FSM entitlement and therefore eligibility for school meal holiday payments, should also be considered, for example, those relating to minimum wage legislation. An increase in the minimum wage may reduce the number of children who are entitled to FSMs as their household income rises above the threshold.

Other potential changes to policies from the Northern Ireland Executive and Westminster could also impact on FSM entitlement rates and therefore, the cost to implement the introduced Bill.

**Potential Scrutiny Points:**

4. Given financial challenges within the Department of Education Members may wish to consider whether other viable funding options to sustainably implement the Bill, if enacted as introduced.
5. Members may wish to consider the range of external factors that could indirectly affect the cost of implementing the Bill, such as the state of the Northern Ireland economy and changes to policies in Westminster and the Northern Ireland Executive.

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<sup>34</sup> [Consumer price inflation, UK - Office for National Statistics](#)

## 4 Key takeaways

The Education (Holiday Meal Payments) Bill (the Bill) contains provisions that would amend the Education and Libraries (Northern Ireland) Order 1986 to place a duty on the Education Authority to provide financial support during school holidays to children who are eligible for FSMs. The key points of this paper are outlined below:

The Education (Holiday Meal Payments) Bill seeks to place a statutory duty on the Department of Education to provide direct payments to eligible families during school holiday periods. There is a body of research highlighting the scale of food insecurity in Northern Ireland, with the Trussell Trust distributing “over 90,300 emergency food parcels, the highest number ever distributed” and over 60,000 of these for children. This context underscores the Bill’s intention to address holiday hunger among pupils entitled to FSMs.

Responses to the Bill’s consultation paper demonstrated overwhelming support for the Bill’s core proposals. According to the consultation summary, 98% of respondents agreed that holiday payments would alleviate financial pressure on low-income families, and 99% believed that greater food security would positively impact children’s health and wellbeing. Stakeholder engagement by the Bill sponsor also indicated broad support across community and children’s sector organisations.

The Bill’s financial implications are significant and will require careful consideration by Members. The EFM estimates annual costs of approximately **£21.9 million**, with RaISe modelling suggesting potential expenditure of **£21.9 million per year at 100% uptake**, or **£17.64 million** at current uptake levels of 80.9%. These costs sit within a challenging public finance environment in which the Education Minister highlighted a widening funding gap of over £800 million in 2026/27.

A number of external factors could influence the long-term cost of the scheme, including changes in FSM eligibility, inflationary pressures on school meal costs, and wider economic conditions. A Departmental paper has highlighted that school meal production costs continue to rise and that the service is

“operating at a substantial loss”, suggesting that the cost of school meals may increase in the future. If so, the value of holiday meal payments will also increase to remain equivalent to meal costs, as required by Clause 1(1D).

The Bill also makes use of delegated powers that will shape how the scheme operates in practice. Clause 1(F) allows the Department to “make regulations to determine the financial payment payable”, while Clause 1(G) enables amendment of “the relevant periods”. Clause 4(4) further permits the Department to make incidental and transitional provisions “by order”. However, the Bill does not specify whether these powers are subject to affirmative or negative resolution, leaving the level of Assembly scrutiny unclear.

Overall, the Bill aims to address a clearly evidenced social need and has attracted strong public support. However, Members may wish to consider the sustainability of funding, the potential impact of fluctuating eligibility levels, and the absence of defined scrutiny procedures for key regulation-making powers. These issues will be central to assessing the deliverability and long-term effectiveness of the proposed statutory scheme.

## Appendix 1:

Table A: Timeline of financial challenges

Date	Contributory Factors
<b>February 2024 to date</b>	Ongoing work across Northern Ireland Departments to facilitate the Executive’s implementation of the December 2023 political agreement and related February 2024 funding package – such as the <a href="#">Interim Fiscal Framework</a> (May 2024), the <a href="#">Budget Sustainability Plan</a> (October 2024) and the accompanying <a href="#">Budget Improvement Plan Roadmap</a> (December 2024), as well as the establishment of <a href="#">Interim Transformation Board</a> (March 2025). Generally speaking, all have aimed to improve Northern Ireland public finances, while seeking to balance numerous competing priorities and demands for limited available funding.
<b>August 2024</b>	The Department of Finance (DoF) undertook a 2025-28 Budget Information Gathering Exercise, requesting returns from all Northern Ireland Departments, marking the start of the planning stage in the 2025/26 Northern Ireland Executive Budget cycle. The DoF found that “Departments identified a reported £767 million of unfunded pressures”, as <a href="#">reported</a> to the Assembly on 23 September 2024.
<b>October 2024</b>	The <a href="#">Chancellor’s Autumn Budget 2024</a> set out some of the multi-year competing pressures facing the United Kingdom Government, potentially adversely impacting the Government’s spending power in certain areas, along with other decisions relating to social security - see RaISe Briefing Paper 47/24 entitled “ <a href="#">Chancellor’s Autumn Budget 2024: initial considerations for Northern Ireland</a> ”.

<p><b>December 2024</b></p>	<p>Northern Ireland Departmental bids for 2025/26 <a href="#">resource and capital</a> expenditure exceeded the <a href="#">Northern Ireland Budget</a> allocated by the United Kingdom Government to the Executive.</p> <p>Later that month, the <a href="#">2025/26 Draft Executive Budget</a> and accompanying <a href="#">Written Statement</a> by the Minister for Finance highlighted ongoing “pay and inflationary pressures” and “growing demands” on public services.</p>
<p><b>March 2025</b></p>	<p>The <a href="#">Chancellor’s 2025 Spring Statement</a> updated the House of Commons on the United Kingdom economy and public finances. Her Statement was accompanied by an Economic and Fiscal Forecast from the <a href="#">Office for Budget Responsibility</a> (OBR). It also announced a number of policy decisions, which included reforms to the welfare system, increased defence spending and a £3.25 billion (b) “<a href="#">Transformation Fund</a>” to reform public services. (Important to note this central government development, as the Northern Ireland Executive Budget is a sub-cycle within the United Kingdom Government’s Budget cycle.)</p>
<p><b>1 April 2025</b></p>	<p>DoF officials thereafter explained during the Assembly Finance Committee <a href="#">meeting</a> that:</p> <p><i>.... on the allocations out of that fund, it will depend on which Whitehall departments get allocations from it so we don’t get it on the £3.25 billion we’ll get it on the allocations .</i></p>
<p><b>3 April 2025</b></p>	<p>The Executive agreed the <a href="#">2025/26 Executive Budget</a>, which the Finance Minister <a href="#">described</a> as “sets out a direction of travel” which “clearly prioritises its Programme for Government priorities”.</p>

<b>4 April 2025</b>	The context significantly changed when the American President announced substantial trade tariffs, which followed with: plummeting stock markets across the globe, a collapsing American bond market; the subsequent 9 April 90-day pause on some new US tariffs; other countries' similar pause, further consideration of introducing tariffs or issuance of retaliatory tariffs on the United States (US); and, a international trade war arising between the US and China.
<b>8 May 2025</b>	A non-binding trade deal was agreed by between the US and UK Governments. The general terms of the new trade deal where subsequently published in the <a href="#">UK-US Economic Prosperity Deal</a> (EPD); the deal non-binding, meaning on-going further negotiations to work through the detail of the deal.
<b>24 June 2025</b>	The DoF published its <a href="#">2025-26 Budget Factsheet</a> , setting out the Executive's spending plans for the one-year period from 1 April 2025 to 31 March 2026.
<b>3 October 2025</b>	The Executive's Finance Minister provided a Written Ministerial Statement detailing <a href="#">Treasury Funding Available 2026-2029/30</a> .
<b>26 November 2025</b>	The <a href="#">Chancellor's Autumn Budget 2025</a> detailed the United Kingdom Government's resource spending plans up to 2028/29 and capital plans up to 2029/30.
<b>6 January 2026</b>	<p>The Finance Minister published the <a href="#">Draft Budget 2026-2029/30</a> (not Executive agreed) and announced an eight-week public consultation on the proposals.</p> <p>The Education Minister <a href="#">responded</a> to the Draft Budget 2026-2029/30, stating: <i>While I acknowledge the significant challenges involved in setting a budget, it is important to be clear: even if I was prepared to accept the devastating cuts implicit in this</i></p>

	<p><i>draft, as a practical matter, such a budget would be undeliverable. A budget must be more than figures on paper; it must be deliverable in reality.</i></p> <p>The Minister continued:</p> <p><i>Under the proposed allocations, my Department would be required to make savings of approximately £826 million in 2026-27, £1.01 billion in 2027-28, and £1.15 billion in 2028-29. These levels of reduction are simply not achievable.</i></p>
<p><b>4 February 2026</b></p>	<p>The Education Minister published a <a href="#">Five-year Education Budget Strategy</a> for public consultation.</p>
<p><b>11 February 2026</b></p>	<p>HM Treasury <a href="#">agreed</a> a reserve claim for the Northern Ireland Executive, to provide £400 million for 2025/25, which is to be repaid over three years.</p> <p>The Finance Minister confirmed in a <a href="#">written statement</a> that same day that the £400 million would be allocated as follows, as agreed by Executive:</p> <ul style="list-style-type: none"> <li>• Department of Education - £214.6 million</li> <li>• Department of Health - £185.4 million.</li> </ul>
<p><b>3 March 2026</b></p>	<p>The <a href="#">Chancellor delivered her Spring Forecast 2026</a></p> <p>Later that day, in an <a href="#">Oral Statement</a> to the Assembly, the Finance Minister confirmed an additional £390 million Barnett consequentials over the next three-year period, comprising. Resource DEL - £380 million; and, Capital DEL - £9 million.</p>