



# **BRIEFING ON FREE SCHOOL MEALS ELIGIBILITY IN NORTHERN IRELAND**

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This paper outlines concerns about the adequacy of current Free School Meals (FSM) eligibility criteria as an effective method for targeting the provision of FSM and uniform grants at children in poverty, as well as the key way of targeting additional resources and policy responses to addressing educational disadvantage.

It draws on the findings of a report commissioned by NICCY from Dr Nicola Gleghorne of QUB which provided analysis of Family Resource Survey data from 2017/8, 2018/9 and 2019/20, to determine how closely the current FSM eligibility criteria identifies children in poverty. This finds that the current eligibility criteria are extremely inaccurate, with only 59% of children in poverty eligible for FSM and, conversely, only a third of children eligible for FSM (34%) experiencing poverty. The paper found that simply raising the income threshold would not address this disparity, due to the requirement for families to be in receipt of benefits, given a significant proportion of working families on low incomes are not in receipt of any benefits.

Finally, the paper reflects on proposals to amend FSM eligibility criteria published in November 2024 and provides advice in relation to these. While NICCY supports the provision of FSM to children on a universal basis, the importance of FSM eligibility criteria as a poverty proxy within the education system will continue. The proposals to increase the income threshold only marginally improve the access of poor children to FSM, and this will continue to be highly problematic until more significant changes are implemented.

## **Introduction**

The most recent government poverty statistics show that one in four children (25%) are currently living in poverty,<sup>1</sup> this means over 100,000 children in Northern Ireland (NI) going without basic necessities, because their parents cannot afford them. The impact on children's lives is enormous, impacting on their education, health outcomes, opportunities for play and social inclusion, and their future life chances.

But it is important to be clear that poverty is not inevitable – the poor do not necessarily need to 'always be with us'. Governments can act to lift children out of poverty – we have seen government action lift millions of pensioners out of poverty in the past. And indeed, the converse is also true: we have seen government policy plunge millions of children into poverty over the last 10 years, through austerity and 'welfare reform' cuts.

The good news is that we are at a historic moment in relation to tackling child poverty: over the forthcoming months we will see a local Anti-Poverty Strategy published and implemented, and also a UK Child Poverty Strategy. Both governments, with access to all the policy levers

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<sup>1</sup> Department for Communities (2024), Family Resources Survey data, Relative Child Poverty (After Housing Costs).

that need to be engaged are looking at child poverty, and now, at this historic moment, it is time for ambition, determination and cooperation to end child poverty. One of the key ways the NI Executive can address child poverty is to help to reduce the costs for basic necessities, and in particular reducing the costs of education through providing FSM and a grant towards uniform costs.

FSM eligibility criteria have been established to identify children from low income households, so that they can be provided with a nutritious meal at school, for welfare reasons and to support them to engage in their education. Currently, parents have to complete an application form on an annual basis and provide evidence of their income to determine the eligibility of their children for FSM.

However, FSM eligibility not only determines whether children are entitled to a FSM during school term, but also acts as a 'proxy' for low income within education services. It is used as a means of measuring educational inequalities and targeting resources at children from low-income households including eligibility for uniform grants, an additional 'Extended Schools' payment provided to schools for each child on FSM and preferential access to other services, e.g. the 'social deprivation' criteria for pre-school places. Given its use across education services as a way of identifying and targeting support to children from low-income households, it is critical that this measure accurately reaches those on the lowest incomes.

As a member of the Co-Design Group on the Anti-Poverty Strategy, NICCY became aware of a problematic discrepancy in relation to the eligibility criteria for FSM. Groups working with families in poverty reported that many families struggling to make 'ends meet' on low incomes were in receipt of no financial help from government, in terms of means tested benefits, and were not even entitled to FSM (and therefore uniform grants). NISRA provided an analysis of Family Resources Survey (FRS) data, which analysed the proportion of children in poverty in receipt of FSM. The findings were startling: less than one in three children in poverty were in receipt of FSM. Indeed, the majority of children in receipt of FSM were not currently experiencing poverty. This clearly shows that FSM eligibility does not accurately target children in poverty, and this urgently needs addressed.

Over recent years the Department of Education (DE) in Northern Ireland has explored extending FSM on a universal basis to children within certain year groups and has reviewed FSM eligibility to potentially extend this to a larger number of children. In November 2024 DE launched a consultation on FSM eligibility,<sup>2</sup> outlining options for the provision of FSM on a

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<sup>2</sup> [Review of Free School Meals and Uniform Grant Eligibility Criteria | Department of Education](#). The consultation closes on 14 February 2025.

universal basis for certain year groups, and changing the income threshold for the year groups not in receipt of universal FSM to include more children and young people.

In other parts of the UK FSM are provided on a universal basis for children within certain year groups, and this has been found to be beneficial, in terms of overcoming the stigma of FSM, and ensuring a much wider group of children benefit from nutritious meals each school day. NICCY strongly supports FSM being provided on a universal basis to children. At the same time, the FSM measure must also be changed to more accurately target children in poverty, given its role as a 'proxy' for poverty within the education system, and its use in relation to uniform grants and additional 'extended schools' funding for schools, to tackle educational disadvantage associated with poverty.

To inform these considerations, NICCY commissioned a paper to investigate the reliability of FSM eligibility as a measure of disadvantage and explore a discrepancy between FSM eligibility and children in poverty in Northern Ireland.

## ***Findings of Exploring the Discrepancy Between Free School Meals Eligibility and Children in Poverty in Northern Ireland: A Research Report (2025)<sup>3</sup>***

### **Methodology**

Data from the Family Resources Survey (FRS) was used to explore the relationship between free school meals receipt, eligibility and poverty status. Data for the years 2017/2018, 2018/2019 and 2019/2020 were included in the dataset and analysed as one cohort of 1493 families, of which 310 families were in poverty and 1183 were not in poverty.

The paper aimed to answer the following research questions:

1. What is the relationship between Free School Meals Receipt and Poverty Status?
2. What are the demographic characteristics of families living in poverty and of families eligible for free school meals using the current criteria?
3. What are the characteristics of families in poverty who are not eligible for free school meals?
4. How does equalisation affect the numbers of families in poverty who are eligible for Free School Meals?
5. What is the most equitable criteria for free school meals eligibility to ensure children who most need free school meals meet the criteria?

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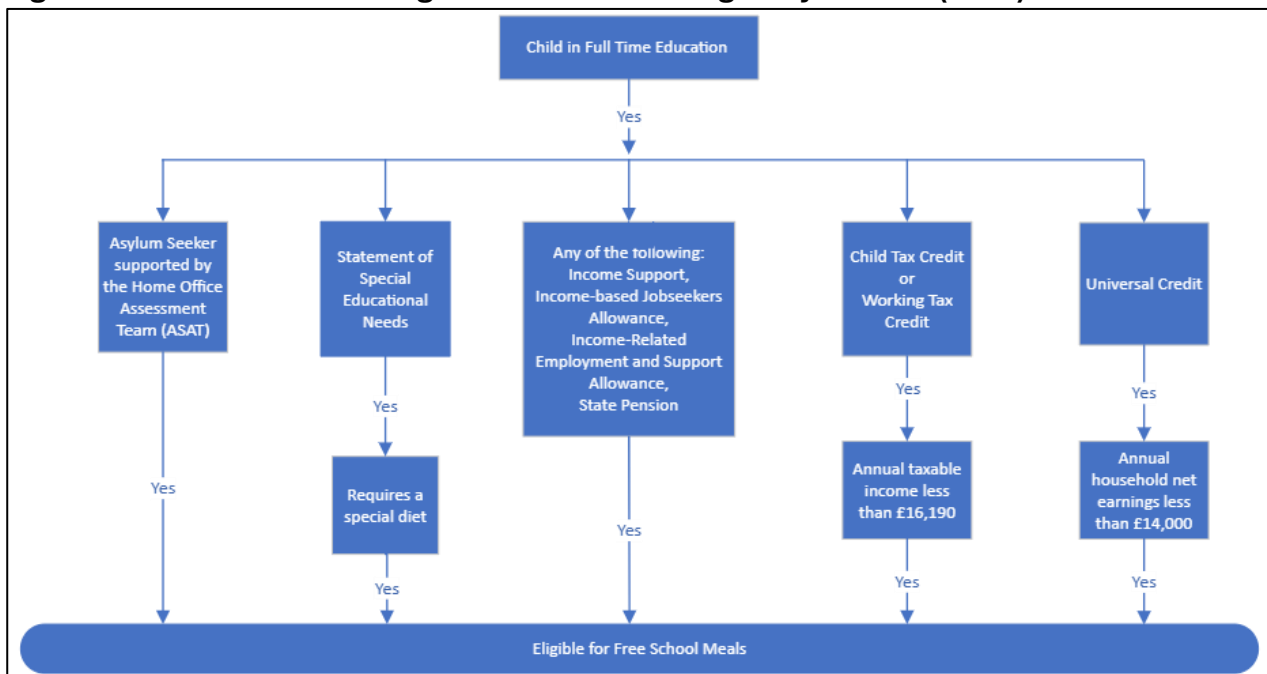
<sup>3</sup> Gleghorne, N., (February 2025), **Exploring the Discrepancy Between Free School Meals Eligibility and Children in Poverty in Northern Ireland: A Research Report**, (Belfast: NICCY).

## Findings

FSM is used as a ‘proxy’ for poverty in the education system, but is a very poor indicator of a child being in poverty in Northern Ireland.

- Two in five (41%) of families in poverty were not eligible for FSM between 2017 and 2020.
- Only around one in three (34%) of families eligible for FSM were in poverty between 2017 and 2020.

**Figure 1: A Flowchart showing the Current FSM Eligibility Criteria (2024)<sup>4</sup>**



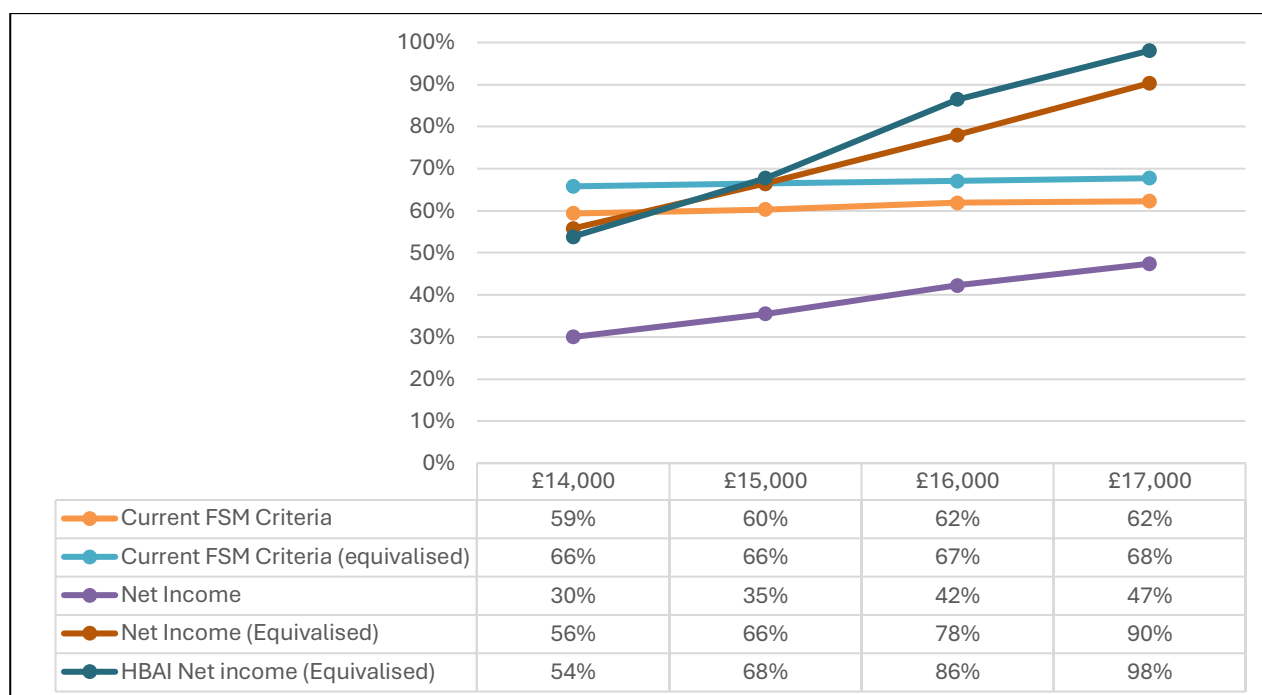
The current FSM criteria disadvantages working families. With the exception of small numbers of asylum-seeking children and children with SEN requiring special diets, the FSM criteria state that eligibility for state benefits is a requirement for FSM. The analysis of FRS data showed this to be one of the main reasons for children in poverty being excluded from the current eligibility criteria for FSM: due to their families not receiving any state benefits. To explore how the eligibility criteria could be amended to ensure they more accurately identify children in poverty, five different sets of criteria were used to calculate FSM eligibility in relation to relative poverty before housing costs, using income thresholds of £14,000, £15,000, £16,000 and £17,000. These were plotted on a graph and are shown in Figure 2 below. It is important to note that net income was not based on any benefit receipt.

<sup>4</sup> Ibid p8.

The five eligibility criteria were:

1. The current eligibility criteria for FSM;
2. The current FSM criteria equivalised;
3. Net income;
4. Net income equivalised; and
5. Net income equivalised using an additional net income variable used in the HBAI dataset. The additional net income variable from the HBAI dataset included child income which the previous net income variable did not.

**Figure 2: Percentage of children in relative poverty who would be eligible for FSM using different eligibility criteria and income thresholds**



As the figure above demonstrates, merely increasing the income thresholds will not provide better targeting to children in poverty:

- When the income threshold in the current FSM criteria is adjusted for family size (as is the practice in relation to poverty thresholds), more children in poverty are eligible for FSM; and
- When net income is adjusted for family size and is used as the eligibility criteria instead of the current FSM criteria (ie removing the requirement to be in receipt of benefits), almost all children in poverty are eligible for FSM.

In light of these findings, it is proposed that the current FSM criteria are changed to ensure that all children in poverty are entitled to FSM and uniform grants, by removing the requirement for receipt of benefits and using net income, adjusted for family size.

## Conclusions

It is important that FSM eligibility is targeted primarily at children in poverty to ensure that the children who are at most risk of going without sufficient nutritious food are prioritised. The fact that FSM eligibility is used to provide uniform grants, and also to target additional resources to schools to address educational disadvantage provides additional impetus to ensure that it accurately identifies children living in poverty.

On the basis of the above analysis demonstrating that 41% of children in poverty are not eligible for FSM, and that 66% of children eligible for FSM are not in poverty, it is clear that the current eligibility criteria are inadequate. Indeed, this analysis also demonstrates that increasing income thresholds using the other current criteria only marginally increases the proportion of children in poverty eligible for FSM - from 59% at an income threshold of £14,000, to 62% when the income threshold is raised to £17,000. The majority of children who become eligible for FSM through increasing the income threshold are not in poverty.

While this paper has focussed on ensuring that all children in poverty are eligible for FSM, NICCY also recognises the evidence of the benefit of providing FSM on a universal basis, as an early intervention and prevention approach, in terms of improving health and educational outcomes, building healthy eating habits, and overcoming the stigma of FSM. Ideally FSM should be provided on a universal basis to children of all ages. However, recognising that this may not be possible initially NICCY recommends that the provision of FSM is provided on a universal basis for younger children in the first instance, with the goal of progressively expanding to older children over time.

## Recommendations:

**The primary target for FSM must be children in poverty, and so the eligibility criteria should be amended to ensure access for all children in poverty.**

**The requirement for families to be in receipt of state benefits should be removed as a criteria for FSM, and eligibility should be based solely on income levels, equivalised by family size. It is not adequate to increase the number of children able to access FSM solely by increasing income thresholds in the eligibility criteria, as this will only marginally increase the number children in poverty accessing FSM.**

**In addition, FSM should be provided on a universal basis, starting with younger children in the first instance, to ensure that all children receive at least one nutritious meal a day while at school, and to overcome the stigma associated with FSM. This should be expanded to older children as budget allows.**



## **Appendix: NICCY’s response to consultation questions in CONSULTATION DOCUMENT FOR THE REVIEW OF FREE SCHOOL MEALS AND UNIFORM GRANT ELIGIBILITY CRITERIA**

### **Consultation Question 1**

Later questions will ask about potential increases to the income threshold levels for those in receipt of Universal Credit. Leaving this aside, should the other current eligibility criteria remain the same?

- Yes, the eligibility criteria should remain the same
- No, the eligibility criteria should be changed

If you answered “No, the eligibility criteria should be changed”, please give further details in the space provided of how you believe the criteria should be changed

It is important that FSM eligibility is targeted primarily at children in poverty to ensure that the children who are at most risk of going without sufficient nutritious food are prioritised. The fact that FSM eligibility is used to provide uniform grants, and also to target additional resources to schools to address educational disadvantage provides additional impetus to ensure that it accurately identifies children living in poverty.

On the basis of analysis commissioned by NICCY that demonstrates 41% of children in poverty are not eligible for FSM, and 66% of children eligible for FSM are not in poverty, it is clear that the current eligibility criteria are inadequate.<sup>5</sup> Indeed, this analysis also demonstrates that increasing income thresholds using the other current criteria only marginally increases the proportion of children in poverty eligible for FSM - from 59% at an income threshold of £14,000, to 62% when the income threshold is raised to £17,000. The majority of children who become eligible for FSM through increasing the income threshold are not in poverty.

### **Recommendations:**

**The primary target for FSM must be children in poverty, and so the eligibility criteria should be amended to ensure access for all children in poverty.**

**The requirement for families to be in receipt of state benefits should be removed as a criteria for FSM, and eligibility should be based solely on income levels, equivalised by**

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<sup>5</sup> Gleghorne, N., (February 2025), **Exploring the Discrepancy Between Free School Meals Eligibility and Children in Poverty in Northern Ireland: A Research Report**, (Belfast: NICCY).

**family size. It is not adequate to increase the number of children able to access FSM solely by increasing income thresholds in the eligibility criteria, as this will only marginally increase the number of children in poverty accessing FSM.**

### **Consultation Question 2**

If a form of universal FSM provision were to be introduced in Northern Ireland, how strongly do you agree or disagree that this should prioritise younger pupils in a similar way to the rest of the UK?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

### **Consultation Question 3**

In light of the Department's challenging budget position, how strongly do you agree or disagree that it should be a priority for the Department to increase the number of children that are able to access free school meals?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

### **Consultation Question 4**

If additional funding is made available to give more children free school meals, please indicate how you would prefer that it should be used?

- all be used to allow more low-income families to receive free school meals
- all be used to provide a universal free school meal to all pupils in certain younger years at school like the rest of the UK
- be split between allowing some more low-income families to receive free school meals and offering a universal free school meal to all pupils in certain year groups at school

### **Consultation Question 5**

If it were decided that the only change would be to rollout a form of universal FSM, which of the following groups of pupils would be your preference to receive a universal FSM?

- Universal FSM for full-time pupils from nursery to P3
- Universal FSM for full-time pupils from nursery to P7
- Universal FSM for full-time pupils in nursery to Yr14
- Other

### Consultation Question 6

If it were decided that the Department should rollout a form of universal FSM provision AND it should also enable more low-income pupils from all school years to be entitled to FSM, which of the following is your preferred option for who should be offered a universal FSM?

- Universal FSM for full-time pupils from nursery to P3
- Universal FSM for full-time pupils from nursery to P7
- Other (please specify)

While ensuring that all children in poverty are eligible for FSM must be the priority, NICCY also recognises the evidence of the benefit of providing FSM on a universal basis, as an early intervention and prevention approach, in terms of improving health and educational outcomes, building healthy eating habits, and overcoming the stigma of FSM. Ideally FSM should be provided on a universal basis to children of all ages. However, recognising that this may not be possible initially NICCY recommends that the provision of FSM is provided on a universal basis for younger children in the first instance, with the goal of progressively expanding to older children over time.

### Recommendation:

**FSM should be provided on a universal basis, starting with younger children in the first instance, to ensure that all children receive at least one nutritious meal a day while at school, and to overcome the stigma associated with FSM. This should be expanded to older children as budget allows.**