



Department of  
**Education**  
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**CONSULTATION DOCUMENT FOR  
THE REVIEW OF FREE SCHOOL MEALS  
AND UNIFORM GRANT ELIGIBILITY CRITERIA**

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## Foreword

I am launching this public consultation on the options from the review of the eligibility criteria for free school meals (FSM) and uniform grants (UG). The Department's budget is an extremely challenging position, both now and as we look ahead to future years. Using the 2025-26 planning budget, my Department faces pressures in excess of £700m next year and this figure is projected to exceed £1 billion in 2027-28. Nonetheless, I recognise that FSM and UG are important to a large number of families across Northern Ireland in ensuring that their children are able to access a healthy school lunch each day and have help with the costs of school uniforms.

While a consultation on the work to try to reduce the costs of school uniforms has recently closed and work on this is continuing at pace, this consultation examines the number of children and young people who could benefit from FSM and UG.

My Department has explored a number of options and has modelled the impact of each option in terms of the number of extra pupils that could benefit and the associated additional costs.

This consultation seeks your views on how we can use the available funding to maximise the benefits to children and young people and their families. I would encourage you to use this consultation to tell us what you think we should be doing in this area and I will then take this into account along with all the other factors in making my decision on the way forward.

**Paul Givan MLA**  
Minister of Education

## Executive Summary

This consultation document outlines a range of options which would increase the number of pupils able to access free school meals (FSM) and uniform grants (UG). Modelling is used to estimate how each option would change the number of pupils who could benefit from these supports and the associated annual costs.

It explains how the current eligibility criteria in Northern Ireland targets support towards low-income families who are eligible for certain welfare benefits such as Universal Credit (UC). It also explains how the approach used in England, Scotland and Wales differs from that in Northern Ireland as those nations offer a form of universal FSM to some primary year groups irrespective of whether the family is on a low-income. The advantages of universal FSM provision are listed in terms of how it would allow all pupils in certain year groups to avail of the health and educational benefits of taking a healthy school lunch each day which helps to establish healthy eating habits at a young age. The advantages of targeting support for low-income families thus ensuring pupils in greatest financial need are able to access a meal are also documented.

The options considered range from those that continue to target all FSM resources towards maximising the number of low-income families able to benefit from FSM across all year groups, to options that introduce universal FSM to some or/all year groups where pupils would receive a universal FSM irrespective of their family's financial situation.

When the Minister makes a final decision on the future eligibility criteria for FSM and UG, he will have to take the full range of relevant factors into account. This includes the current very severe pressures on the education budget as the Minister highlighted in his Foreword to this document. Within this context, he must both balance the benefits of an increase in the number of pupils able to access FSM and UG with the need to fund other educational priorities and determine the extent to which the options set out in this review are affordable. The Minister will also have to take the operational challenges into account, ensuring that school kitchens and dining halls have the capacity to implement a significant increase in the number of school meals produced and served each day.

The range of options considered by this review have a wide variation in the number of pupils who would be able to benefit and the potential costs involved with the rollout. It is important to try to understand how these figures have been modelled and the implications for each option by considering this document in full.

The most recent school census shows that in the 2023/24 academic year, approximately 94,000 full-time pupils are entitled to FSM. Following the Minister's interim decision in June 2024 to increase the FSM income threshold for those in receipt of UC, the number of full-

time pupils entitled to FSM is modelled to be 93,400. The Department's modelling shows that if the current eligibility criteria remain unchanged, the number of full-time pupils entitled to FSM and UG is likely to fall by 5% to 88,700 in 2025/26. This reflects rising wages and the ongoing transition being progressed by the Department for Communities of those in receipt of some welfare benefits to UC. The numbers of pupils able to access FSM and UG under each option and the associated estimated costs are therefore compared to what is modelled to happen in 2025/26 if no changes are made to the eligibility criteria.

Below is a list of the options considered by the review. It shows the anticipated additional pupils and the additional costs of each option being rolled out to full-time pupils in 2025/26 compared with the anticipated pupil numbers and costs in 2025/26 if the criteria remain unchanged.

**Option (a) Universal FSM for pupils from nursery to P3 and unchanged income threshold on the eligibility criteria for all pupils**

An additional 59,500 children up to P3 receiving a universal FSM at an additional annual cost of £46m.

**Option (b) Universal FSM for pupils from nursery to P7 and unchanged income threshold on the eligibility criteria for all pupils**

An additional 132,100 children up to P7 receiving a universal FSM at additional annual cost of £103m.

**Option (c) Universal FSM for pupils in nursery to Yr14 and unchanged income threshold on the eligibility criteria for all pupils**

An additional 253,800 pupils up to Year 14 receiving a universal FSM at an additional annual cost of £202m.

**Option (d) Raising the income threshold on the eligibility criteria for all pupils with no universal FSM**

Depending on the annual income threshold level between £16,000 to £20,000, an additional 3,600 to 17,100 pupils across all school years entitled to FSM and UG at an additional annual cost of £3.1m to £14.7m.

**Option (e) Universal FSM for pupils from nursery to P3 AND raising income thresholds on the eligibility criteria for all pupils**

Depending on the annual income threshold level between £16,000 to £20,000, an additional 62,100 to 72,000 pupils either entitled to FSM and UG across all school years or receiving a universal FSM up to P3 at an additional annual cost of between £48.6m to £57.3m.

**Option (f) Universal FSM for pupils from nursery to P7 AND raising income thresholds on the eligibility criteria for all pupils**

Depending on the annual income threshold level between £16,000 to £20,000, an additional 133,600 to 139,500 pupils either entitled to FSM and UG across all school years or receiving a universal FSM up to P7 at an additional annual cost of between £104.1m to £109.8m.

**Option (g) Retain status quo**

Maintaining the same eligibility criteria is likely to result in a fall in the number of pupils entitled to these supports from 93,400 pupils modelled to be entitled to FSM in 2024/25 to 88,700 full-time pupils in 2025/26.

## 1. Introduction and Background

- 1.1 This consultation seeks your views on how the eligibility criteria for free school meals (FSM) and uniform grants (UG) in Northern Ireland could change to allow more pupils to access these supports.
- 1.2 In exploring how this could be taken forward, this consultation document outlines a range of options for changing the eligibility criteria for FSM and UG and the potential costs of making those changes.
- 1.3 The current and likely future budget for education is very challenging, with difficult decisions having to be taken in order to remain within the Department's budget. The Department faces an overspend in 2024/25 of c£190m. Looking ahead, the Department's forecast pressures are over £700m for 2025-26, rising to over £1 billion in 2027-28. This consultation is being undertaken with an understanding that an increase in the number of pupils able to access a free school meal would not be affordable from within the current education budget and would require additional funding if any changes are to be implemented. There is also the potential for changes to be implemented on a phased basis, particularly if the chosen option would require significant changes to be made to the current Education Authority delivery model for school catering. Further changes to the eligibility criteria could also be made at a later point if more funding were to become available.
- 1.4 The Department's FSM policy currently provides targeted support to families on low incomes. This is aimed at those children deemed to be most in need and aims to ensure that eligible children have access to a nutritious meal that is suitable as the main meal of the day.
- 1.5 UG provided under the Clothing Allowances Scheme provide assistance as a contribution towards the cost of school uniform and clothing for physical education. The costs of UG in this document are based on the levels of grant provided in the 2022/23 year following the 20% uplift in grant levels.
- 1.6 The current eligibility criteria for FSM and UG are largely based on a family submitting an application for FSM and UG on the basis of being in receipt of certain welfare benefits and being below any income threshold that is applied to the FSM eligibility criterion, such as the £15,000 income threshold for those UC claimants applying for FSM.
- 1.7 As is referenced further in section 7 of this document, FSM are also available to young people aged 16-18 attending a full-time course in a Further Education College. The same criteria apply to these students as apply to school pupils.

1.8 The current eligibility criteria for FSM are as follows:

*Parent(s)/Guardian(s) can apply if their son or daughter is in full-time education and if they are in receipt of one of the following benefits:-*

- *Income Support;*
- *Income Based Jobseeker's Allowance;*
- *Income Related Employment and Support Allowance;*
- *Guarantee Element of State Pension Credit;*
- *Child Tax Credit or Working Tax Credit with an annual taxable income of £16,190 or less;*
- *Universal credit and have net household earnings not exceeding £15,000 per year.*

*Or:-*

- *if they are an Asylum Seeker supported by the Home Office Asylum Support Assessment Team (ASAT); or*
- *if their child has a statement of special educational needs and is designated to require a special diet.*
- *If none of the above apply and a child presents at school hungry, the school should, on humanitarian grounds, provide free school meals to the child. The school should then make a referral to the Education Authority's Education Welfare Service.*

1.9 The criteria for eligibility for UG are the same as the benefits-based FSM criteria (shown above), although UG is only available to pupils in P1-Year 14 and the equivalent ages in special schools. UG is not paid for students attending a Further Education College. However, if these students' full-time course includes physical education (PE), a grant can be paid for PE kit.

### **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.



## 2. Current position In England, Scotland and Wales

- 2.1 Free school meal criteria differ across the four regions of the UK. A key difference is that other regions of the UK use a combination of universal FSM provision for all pupils in certain year groups in primary school, along with means-tested criteria that apply to all year groups.
- 2.2 In England, a universal FSM is available to all pupils in the equivalent of our P1-P3. In Scotland, a universal FSM is currently available to all pupils in the equivalent of our P1-P5. In Wales, all pupils in primary schools have been able to access universal FSM since the start of the 2024/25 school year.
- 2.3 Across England, Scotland and Wales, if a pupil is not in the year groups that can access a universal FSM, the eligibility criteria apply. A lower income threshold applies to those in receipt of Universal Credit (UC) in the other UK regions than in Northern Ireland, meaning that a family is more likely to meet the criteria for FSM here than in the rest of the UK. In Northern Ireland, a family is entitled to FSM if they are in receipt of UC and have net household earnings lower than £15,000 per year. In England and Wales, the equivalent figure is £7,400 per year and in Scotland it is £9,552.
- 2.4 Currently in Northern Ireland, the provision of FSM is all targeted towards supporting low-income families through the eligibility criteria. There is no universal provision provided in Northern Ireland.

## 3. Strategic Context and Case for Change

- 3.1 The Department of Education has five strategic child-centred priorities detailed in its 2023-2028 Corporate Plan. Strategic priority 2 is particularly relevant and important in the provision of FSM and UG to families:

*Strategic Priority 2 – Helping all our children and young people by supporting their well-being and learning*

- 3.2 Under this priority is the objective (c) *All children and young people, including those from disadvantaged backgrounds, are able to participate fully in education, leading to improved learning outcomes.* Support mechanisms such as FSM and UG to help low-income families to overcome financial challenges that may be a barrier to children participating fully in school.
- 3.3 The provision of healthy nutritious food in schools makes a positive contribution to achieving the outcomes in the Children and Young People's Strategy, in particular that *Children and Young People are physically and mentally healthy.*

- 3.4 In addition, the Department has a duty under certain articles set down in the United Nations Convention on the Rights of the Child (UNCRC) and this Review will continue to help support this work particularly around our contribution to provide good quality nutritious food, and education on health and well-being so that children can stay healthy.
- 3.5 Meals offered in schools aim to be healthy and nutritionally balanced. Research demonstrates that the provision of nutritious school meals generates many short and longer-term benefits. This includes positive impacts on the behaviour and concentration of children, on their health and on their learning outcomes. As part of a whole-school approach it also helps to establish healthy eating habits at a young age. This contributes to the wider government work to reduce childhood obesity and the associated health issues that this can lead to. The provision of school meals therefore makes an important contribution to supporting the physical and mental health and wellbeing of children and young people.
- 3.6 While the learning and health benefits of school meals can benefit all pupils, the importance of these meals is potentially greater for children from low-income backgrounds for whom a school meal may be their only nutritious meal of the day. FSM also make an important contribution to addressing the barriers that young people from the lower income backgrounds face in accessing education, participating fully in school life, obtaining formal qualifications and enhancing their employment and lifetime opportunities.

#### **4. Differences between universal FSM provision and criteria based FSM provision**

- 4.1 At present in Northern Ireland, FSM are only available to those pupils who meet the eligibility criteria listed in paragraph 1.8. A large proportion of these pupils are from low-income families. Most of these families will also be entitled to uniform grants.
- 4.2 As outlined in section 2 of this document, universal FSM are provided to pupils in certain year groups in England, Scotland and Wales. This means that all pupils in these year groups are able to receive a free meal each school day irrespective of whether they meet the eligibility criteria.
- 4.3 Families in these areas are still asked to apply for FSM even if they can receive a universal FSM as schools' funding takes account of the number of pupils who are entitled to FSM having successfully met the eligibility criteria. Uniform grants in England, Scotland and Wales are only available to those meeting the eligibility criteria and not impacted by whether a pupil is able to access a universal FSM. Were

universal FSM provision to be introduced in Northern Ireland it would be expected that a similar approach would be used as in the rest of the UK.

- 4.4 Some of the advantages of universal FSM provision and also of targeting support at low-income families are outlined below.

**Advantages of offering universal FSM provision**

- i. It supports children's health by providing a nutritionally balanced meal each day instead of many pupils bringing a less healthy packed lunch to school.
- ii. Research shows that having a healthy diet can have a critical role in a child's cognitive development and their ability to learn. Providing a nutritious school meal can increase pupils' concentration levels during afternoon lessons which can help close the performance gap and reduce inequality.
- iii. It boosts uptake of school meals and helps to reduce poverty-related stigma associated with free school provision only being available to those from low-income backgrounds.
- iv. There is an association between food insecurity and children's emotional and mental health symptoms including aggressive behaviours, hyperactivity, and impaired social skills. Behaviour is closely linked to attainment in school.
- v. The benefits of a healthy diet are well known and can not only help maintain a healthy weight but can reduce the risk of tooth decay, chronic diseases such as Type 2 diabetes, coronary heart disease and some cancers. It can also help improve the mental wellbeing of children and young people by increasing self-esteem and improving mood.

**Advantages of increasing number of low-income families accessing FSM**

- i. All of the advantages outlined above for universal provision also apply in targeting free school meal provision towards low-income families.
- ii. It supports pupils who are most in need, based on their family's means.
- iii. It helps to tackle inequalities whereby more children from families described by some as "working poor" who currently fall outside the income thresholds would potentially be able to access support for FSM.
- iv. It supports family budgets and home life, particularly with the current pressures on the cost of living.

### 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*

## 5. How any additional funding for FSM could be used

- 5.1 While there is some overlap between the two, there are two objectives that can be realised through free school meal provision:
- The provision of support to children in low-income families who may not be able to afford nutritious food for their child
  - Helping children to develop healthy eating habits at an early age and being in the best position to learn at school
- 5.2 To date, the priority in Northern Ireland is for FSM provision to support low-income families to ensure that the children from these families have access to a meal sufficient to be their main meal of the day. In recent years, other UK regions have sought to widen the number of families able to access FSM through universal FSM provision in order that the benefits in terms of establishing healthy eating habits and being in the best position to learn at school are realised across whole year groups of children and not just those from low-income families.

### 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*

5.3 If additional funding can be secured for the provision of FSMs, there is a key question of how this funding should be targeted. All of the options within this consultation aim to at least retain the current eligibility criteria. This means that those who continue to meet the current criteria will remain eligible for FSM irrespective of how any additional funding may be targeted. Therefore, if additional funding were available for FSM provision, a policy decision would be necessary on whether any additional funding should:

- **all** be used to support more low-income families by raising the income thresholds on the means-tested eligibility criteria
- **all** be used to provide a universal FSM to younger year groups to ensure children are in the best position to learn and establish healthy eating habits
- be **split** between supporting more low-income families and providing a universal free school meal to whole year groups irrespective of family income

### 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*

## 6. Other Uses of Free School Meal Entitlement

- 6.1 FSM entitlement is used by the Department as a proxy indicator or measure of deprivation which, in turn, is used for policy development work, for statistical purposes and to determine how some funding is distributed to schools. Any changes to the number of pupils entitled to FSM will therefore impact the allocation of this funding.
- 6.2 The Common Funding Formula for schools includes Targeting Social Need (TSN) factors which distributes funding (presently c£75m) to schools using a social deprivation element which recognises the additional costs faced by schools in educating children from socially deprived backgrounds, regardless of ability, and the particular challenges faced in schools with high proportions of children from such backgrounds. The measure used to determine the social disadvantage element of TSN funding is entitlement to free school meals.
- 6.3 The Extended Schools Programme enables those schools that draw pupils from some of the most disadvantaged communities to provide a range of services and programmes outside the traditional school day to help meet the needs of pupils, their families and wider communities. The allocation of funding under the Extended Schools Programme is based on the percentage of pupils enrolled at the school entitled to FSM. Any changes to the number of pupils entitled to FSM could therefore also have a potential impact on the future allocation of funding through the Extended Schools Programme.
- 6.4 As noted in section 4.3, families in the rest of the UK are still asked to apply for FSM even if they receive a universal FSM as schools' funding takes account of the number of pupils who are entitled to FSM. If any form of universal FSM were introduced in Northern Ireland, low-income families (including those able to receive a universal FSM) would still have to apply if they wish to access a uniform grant. It is anticipated that this requirement would encourage all families to still apply for both FSM and UG through the single EA application process, irrespective of whether they could access a universal FSM. This would help to ensure that families receiving a universal FSM would still apply for FSM, with the intention of reducing the risk of FSM not being applied for.

## 7. Numbers of Pupils Entitled to FSM and Uniform Grant

- 7.1 Four out of the last six years has seen a small reduction in the number of pupils entitled to FSM. The DE School Census shows there were 98,488 full time pupils entitled to FSM in 2018/19 (29.7% of full-time pupils). In 2023/24, this figure was 93,990 (27.4% of full-time pupils). Further information on FSM can be accessed on the Department of Education website at:

[www.education-ni.gov.uk/articles/school-meals-statistical-bulletins](http://www.education-ni.gov.uk/articles/school-meals-statistical-bulletins)

- 7.2 The school census does not collect data on entitlement to UG but at 28 June 2024, the Education Authority had confirmed the entitlement of UG to 91,731 pupils attending school during the 2023/24 academic year. The modelling used to inform this consultation has made the assumption that pupils entitled to FSM at each income threshold will also be entitled to UG.
- 7.3 The cost to the EA of school meals in 2023/24 was around £79m and approximately £6m for UG in same period.

## 8. FSM for Students at Further Education Colleges

- 8.1 Young people aged 16-18 that are studying a full-time course at a Further Education College can also be entitled to FSM if they or their parents meet the same eligibility criteria that apply to those attending a school. It is estimated that up to 1,500 students in Further Education colleges are currently entitled to FSM.
- 8.2 The options modelled in this document are based upon numbers of children recorded in the DE School Census 2023/24 that does not include students at Further Education College. Under options that involve an increase in the income thresholds, it is anticipated the same percentage increase in entitlement of school pupils that would result from an increase in the income thresholds would apply to students attending Further Education Colleges. Under option (c) where universal FSM would be provided to all school year groups, further consideration would need to be given to the equivalent universal provision to students aged 16-18 attending a full-time Further Education College.

## 9. Potential options for changing the existing criteria

- 9.1 This review has considered a range of options to increase the number of pupils eligible for FSM and UG. Some provide a universal FSM to some/all year groups, one option could raise the income threshold only while other options are a combination of both universal FSM to some year groups **and** raising the income threshold. All options maintain the same means-tested eligibility criteria applying to both FSM and UG.
- 9.2 The options considered for changing the existing criteria for FSM that would apply to full-time pupils are as follows:

**Option (a)** - Universal FSM for pupils from nursery to P3 and unchanged income threshold on the eligibility criteria for all pupils

**Option (b)** - Universal FSM for pupils from nursery to P7 and unchanged income threshold on the eligibility criteria for all pupils



**Option (c)** - Universal FSM for pupils from nursery to Yr14 and unchanged income threshold on the eligibility criteria for all pupils

**Option (d)** - Raising the income threshold on eligibility criteria applying to all pupils only with no universal FSM

**Option (e)** - Universal FSM for pupils from nursery to P3 **AND** raising the income threshold on the eligibility criteria for all pupils

**Option (f)** - Universal FSM for pupils from nursery to P7 **AND** raising the income threshold on the eligibility criteria for all pupils

**Option (g)** - Retain status quo

- 9.3 **Options (a), (b) and (c)** provide for universal FSM to be introduced for different year groups with the income eligibility criteria unchanged for all pupils. These seek to benefit from the advantages of universal FSM provision as outlined in paragraph 4.4, such as the positive impact on their ability to concentrate and learn in school based on them having a nutritionally balanced lunch and establishing positive eating habits. This will also contribute to wider government work to tackle childhood obesity. These options do not seek to increase the numbers from low-income backgrounds able to receive FSM unless they are in the relevant year group who would access a universal FSM.
- 9.4 **Option (d)** focusses solely on increasing the numbers of low-income families entitled to FSM by raising the income threshold that applies to the current eligibility criteria and does not offer a universal FSM to any pupils.
- 9.5 **Options (e) and (f)** relate to the introduction of both universal FSM for some year groups and also involve a rise in the income thresholds. **Option (g)** would retain the current eligibility criteria for entitlement to FSM and UG.
- 9.6 Budgetary considerations will obviously have a significant bearing on the affordability and therefore the viability of all of the options.

## 10. Modelling Context

- 10.1 The number of families in receipt of the welfare benefits that would have enabled them to successfully apply for FSM and UG has fallen in recent years and is predicted to fall further by the 2025/26 academic year. There are many reasons for this, including rising wages and the continued transition of the recipients of some benefits to Universal Credit.
- 10.2 The UK government has stated that as the move of some benefits customers to UC continues, by April 2025, all those in receipt of Tax Credits will have been invited to



move to UC. This consultation considers the eligibility criteria that would apply from the 2025/26 academic year and so the gross income threshold that currently applies for those applying for FSM or uniform grants on the basis of receiving tax credits will no longer be relevant. The modelling was undertaken based on data from the Department for Communities including family incomes as at summer 2023 as this was the most recent data available.

- 10.3 A fall in the overall number of families in receipt of the benefits which passport to FSM and UG (such as Universal Credit [where a current income threshold of £15,000 per year applies for FSM and UG], Income Support, income-based Jobseeker's Allowance or income-related Employment and Support Allowance) is modelled to also result in a reduction in the number of pupils entitled to FSM and UG. It was for this reason that on 7 June 2024 the Minister announced an interim rise in the net income threshold for those in receipt of UC from £14,000 to £15,000. This sought to broadly maintain the same number of children entitled to FSM and UG in 2024/25.
- 10.4 The modelled fall in the numbers of families in receipt of the relevant benefits in 2025/26 means that if the current £15,000 net income threshold remains unchanged, the number of full-time pupils entitled to FSM would be expected to fall to 88,700 full-time pupils entitled to FSM in 2025/26 compared with the anticipated number of 93,400 full-time pupils being entitled to FSM in 2024/25. **The 88,700 figure for 2025/26 at the current income threshold of £15,000 is therefore the baseline figure against which all options are compared.** To avoid a fall from the 93,400 pupils anticipated to be entitled to FSM in 2024/25 to 88,700 pupils in 2025/26, a further increase in the income threshold will be needed from the interim £15,000 threshold.
- 10.5 The estimated additional annual costs for each option are the costs that would be incurred based on an estimated production cost of £4.00 per meal – this includes food costs, catering staff costs, utility costs and meal transport costs. The costs also take into account the loss of income that would be expected from pupils who would previously have paid for a meal but would now be receiving a free school meal. **The costs referenced in the modelling are therefore the estimated additional costs that would be incurred compared to the costs that would be anticipated in 2025/26 if no changes are made the eligibility criteria.**
- 10.6 The estimated costs do not take into account the associated capital costs that could be needed as options that would result in a large increase in meal numbers may require the Education Authority to look at alternative delivery models and the changes that could be required in each school to enable so many more meals to be provided. There are over 1,100 schools in Northern Ireland, of which nearly 800 are primary schools, and a large increase in the number of meals to be provided would require significant capital investment to increase the capacity of both kitchens and dining

halls. A significant increase in the number of meals produced may mean that the current service delivery model used by the EA would no longer be feasible and an alternative delivery model may be necessary in these circumstances. Work is ongoing with the EA on establishing the capital costs involved in the delivery of the different options.

## 11. Option (a) Universal FSM for full-time pupils from nursery to P3 and unchanged income threshold on the eligibility criteria for all full-time pupils

- 11.1 This option would enable all full-time pupils from pre-school to P3 and pupils of the equivalent ages in special schools to receive a universal free school meal each day irrespective of whether their family meet the eligibility criteria. The means-tested eligibility criteria for both FSM and UG would remain unchanged under this option and so in order that families can access these supports and their school receive the additional funding available to it for FSM pupils, all families of children in all school years would be asked to continue to apply for FSM and UG even if they would receive a universal FSM.
- 11.2 As this option does not involve any change from the interim £15,000 income threshold that was introduced in June 2024, the anticipated number of pupils entitled through the eligibility criteria across all school years is expected to be 88,700. Modelling shows that introducing universal FSM from nursery to P3 would result in an **additional** 59,500 children up to P3 receiving a universal FSM. Therefore, across all year groups, this option would result in 148,200 full-time pupils receiving either a FSM or a universal FSM. This would mean around 43% of full-time pupils across all year groups would receive a free meal each day compared to 27% in 2023/24.
- 11.3 The additional meals to be provided under this option are anticipated to have an additional annual cost of around £46m when compared to the anticipated cost in 2025/26 under the current eligibility criteria. A phased approach to the implementation of this option would be required.

## 12. Option (b) Universal FSM for full-time pupils from nursery to P7 and unchanged income threshold on the eligibility criteria for all full-time pupils

- 12.1 This option would enable all full-time pupils from pre-school to P7 and pupils of the equivalent ages in special schools to receive a universal free school meal each day irrespective of whether their family meet the eligibility criteria. As with option (a), the means-tested eligibility criteria for both FSM and UG would remain unchanged under

this option and so in order that families can access these supports and their school receive the additional funding available to it for FSM pupils, all families of children in all school years would be asked to continue to apply for FSM and UG even if they would receive a universal FSM.

- 12.2 As this option does not involve any change from the interim £15,000 income threshold that was introduced in June 2024, the anticipated number of pupils entitled to FSM across all school years is expected to be 88,700. Modelling shows that this option would result in an additional 132,100 children up to P7 receiving a universal FSM. Across all year groups, this option is modelled to result in 220,800 full-time pupils receiving either a FSM or a universal FSM. This would be around 65% of full-time pupils across all year groups receiving a free meal each day compared to 27% in 2023/24.
- 12.3 The additional meals to be provided under this option are anticipated to have an additional annual cost of around £103m when compared to the anticipated cost in 2025/26 under the current eligibility criteria. A phased approach to the implementation of this option would be required.
- 12.4 This would have very significant capital cost implications across the primary school estate in order to ensure there is sufficient capacity in both kitchens and dining halls.

### **13. Option (c) Universal FSM for full-time pupils from nursery to Year 14 and unchanged income threshold on the eligibility criteria for all full-time pupils**

- 13.1 This option would enable all full-time pupils in pre-school, primary, post-primary and special schools to receive a universal free school meal each day irrespective of whether their family meet the eligibility criteria. As with options (a) and (b), the means-tested eligibility criteria for both FSM and UG would remain unchanged under this option and so in order that families can access these supports and their school receive the additional funding available to it for FSM pupils, all families of children in all school years would be asked to continue to apply for FSM and UG even if they would receive a universal FSM.
- 13.2 As this option does not involve any change from the interim £15,000 income threshold that was introduced in June 2024, the anticipated number of pupils entitled to FSM across all school years is expected to be 88,700. Modelling shows that this option would result in an additional 253,800 pupils up to Year 14 receiving a universal FSM. Across all year groups, this option is modelled to result in 342,500 full-time pupils being able to access either a FSM or a universal FSM. This would be 100% of full-

time pupils across all year groups able to access a free meal each day compared to 27% in 2023/24.

- 13.3 The additional meals to be provided under this option are anticipated to have an additional annual cost of around £202m when compared to the anticipated cost in 2025/26 under the current eligibility criteria. A phased approach to the implementation of this option would be required, potentially over several years.
- 13.4 This would have very significant capital cost implications across the school estate in order to ensure there is sufficient capacity in both kitchens and dining halls or an alternative to the current catering arrangements in schools would be required.

#### 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*

### 14. Option (d) Raising the income threshold on eligibility criteria for all full-time pupils with no universal FSM

- 14.1 Option (d) targets all potential FSM resources towards providing FSM to more children from low-income backgrounds. It does not seek to support younger pupils who are not from low-income backgrounds in the way that universal FSM provision would. Option (d) would raise the annual net earnings thresholds for those in receipt of UC. Raising this threshold widens the pool of low-income families that would be entitled to FSM and UG. The amount that the threshold could be raised by would be dependent on the available funding and the thresholds could be kept under review in order to raise them further when resources allow to enable more children to benefit from FSM.
- 14.2 Since June 2024, FSM and UG are available to a pupil if a parent or guardian is in receipt of UC and has net household earnings not exceeding £15,000 per year.
- 14.3 The table below models the number of full-time pupils that would become entitled to FSM and UG if the net income thresholds for those in receipt of UC were raised to

different amounts. The modelling also reflects the percentage increase in pupils entitled to FSM and the additional costs compared to the anticipated costs in 2025/26 if the current £15,000 net income threshold were to remain unchanged.

Net income threshold	Estimated number of F/T pupils entitled to FSM	Percentage increase in pupils entitled to FSM	Additional annual costs for FSM provision	Additional annual UG costs	Additional annual costs for FSM & UG
£16,000	92,300	4.1%	£2.9m	£0.2m	£3.1m
£17,000	96,000	8.2%	£5.8m	£0.5m	£6.3m
£18,000	99,200	11.9%	£8.4m	£0.7m	£9.1m
£19,000	102,500	15.6%	£11.0m	£0.9m	£12.0m
£20,000	105,800	19.3%	£13.6m	£1.1m	£14.7m

- 14.4 As an example of the data in the table above, if the current UC annual net earnings threshold was raised by £2,000 to £17,000 per year in 2025/26, it is modelled that 96,000 pupils would be entitled for FSM compared to the 88,700 pupils at the current £15,000 income threshold in 2025/26. It is estimated that this would cost an additional £5.8m per year for FSM provision for these pupils and £0.5m per year on UG provision compared to the anticipated costs in 2025/26 if the current criteria remain unchanged. Unlike the options with a form of universal FSM provision, this option is unlikely to require a phased approach to implementation.
- 14.5 Across primary, post-primary, nursery and special school settings, depending on how much the income threshold is raised, the anticipated number of pupils entitled to FSM in 2025/26 of 88,700 at the current £15,000 income threshold could rise to between 92,300 at a £16,000 income threshold and 105,800 at a £20,000 income threshold. This would be between 27% and 31% of full-time pupils across all year groups able to access a free meal each day compared to 27% in 2023/24.

## 15. Option (e) Universal FSM for full-time pupils from nursery to P3 AND raising the income threshold on eligibility criteria for all full-time pupils

- 15.1 This option is a hybrid of option (a) with option (d). This option would enable all full-time pupils from pre-school to P3 and pupils of the equivalent ages in special schools to receive a universal free school meal each day irrespective of whether their family meets the eligibility criteria. For pupils in all year groups, the £15,000 net income threshold that apply under the current eligibility criteria would also be raised.

- 15.2 As in option (d), the table below models the number of full-time pupils that would become entitled to FSM and UG if the net income thresholds for those in receipt of UC were raised from £15,000 to different amounts.

**Table of number of pupils entitled to FSM at different income threshold levels**

Net income threshold	Pupils in all year groups entitled to FSM	Percentage increase in pupils entitled to FSM
£16,000	92,300	4.1%
£17,000	96,000	8.2%
£18,000	99,200	11.9%
£19,000	102,500	15.6%
£20,000	105,800	19.3%

- 15.3 In addition to the pupils in all year groups that would be entitled to FSM and UG by meeting the eligibility criteria as shown in the table above, those not entitled to FSM and UG under the eligibility criteria would be offered a universal FSM up to P3. The overall numbers of pupils modelled to be able to access either a FSM or a universal FSM in 2025/26 and the associated additional costs are shown in the table below. Where the table below shows the numbers of pupils entitled to FSM increasing at each higher income threshold levels, all those up to P3 not entitled to FSM at each income threshold would then be offered a universal FSM. This ensures that no pupil would be counted twice.

**Table of overall pupil numbers able to access a free meal at each income threshold and associated estimated costs for option (e)**

Net income threshold	Pupils in all year groups entitled to FSM	Pupils up to P3 offered a universal FSM	Total pupils offered a free meal	Additional annual costs for free meal provision	Additional annual UG Costs	Additional annual costs for FSM & UG
<b>£16,000</b>	92,300	58,500	<b>150,800</b>	£48.4m	£0.2m	<b>£48.6m</b>
<b>£17,000</b>	96,000	57,600	<b>153,600</b>	£50.5m	£0.5m	<b>£51.0m</b>
<b>£18,000</b>	99,200	56,700	<b>155,900</b>	£52.4m	£0.7m	<b>£53.1m</b>
<b>£19,000</b>	102,500	55,800	<b>158,300</b>	£54.3m	£0.9m	<b>£55.2m</b>
<b>£20,000</b>	105,800	54,900	<b>160,700</b>	£56.2m	£1.1m	<b>£57.3m</b>

- 15.4 For example, at a net income threshold of £17,000 per year, it is modelled that 96,000 pupils across all school years would be entitled to FSM and UG under the eligibility criteria. In addition, 56,700 pupils up to P3 would be able to access a universal FSM resulting in 153,600 pupils being offered either a FSM or universal FSM in 2025/26. This is estimated to cost an additional £50.5m to provide the additional free meals in



2025/26 compared to the anticipated costs if the current criteria were unchanged. There would also be an additional £0.5m required to provide UG to those gaining entitlement.

- 15.5 Across primary, post-primary, nursery and special school settings, depending on how much the income threshold is raised, the anticipated number of pupils able to access a FSM (by either meeting the eligibility criteria or by being in the year groups up to P3 who would be offered a universal FSM) in 2025/26 is modelled to be between 150,800 at a £16,000 income threshold and 160,700 at a £20,000 income threshold. This would be between 44% and 47% of full-time pupils across all year groups able to access a free meal each day compared to 27% in 2023/24.
- 15.6 The scale of the increase in meal numbers that would be required in primary schools means there is likely to be a need for the EA to implement a different delivery model. Such a change would be implemented in a phased approach, potentially over several years.

## 16. Option (f) Universal FSM for full-time pupils from nursery to P7 AND raising the income threshold on the eligibility criteria for all full-time pupils

- 16.1 This option is a hybrid of option (b) with option (d). This option would enable all full-time pupils from pre-school to P7 and pupils of the equivalent ages in special schools to receive a universal free school meal each day irrespective of whether their family meet the eligibility criteria. For pupils in all year groups, the £15,000 net income threshold that applies under the current eligibility criteria would also be raised.
- 16.2 As in option (d), the table below models the number of full-time pupils that would become entitled to FSM and UG if the net income thresholds for those in receipt of UC were raised from £15,000 to different amounts.

**Table of number of pupils entitled to FSM at different income threshold levels**

Net income thresholds	Pupils in all year groups entitled to FSM	Percentage Increase in pupils entitled to FSM
£16,000	92,300	4.1%
£17,000	96,000	8.2%
£18,000	99,200	11.9%
£19,000	102,500	15.6%
£20,000	105,800	19.3%

- 16.3 In addition to the pupils in all year groups that would be entitled to FSM and UG by meeting the eligibility criteria as shown in the table above, those not entitled to FSM and UG under the eligibility criteria would be offered a universal FSM up to P7. The overall numbers of pupils modelled to be able to access either a FSM or a universal FSM in 2025/26 and the associated additional costs are shown in the table below.

**Table of overall pupil numbers able to access a free meal at each income threshold and associated estimated costs for option (f)**

Net income threshold	Pupils in all year groups entitled to FSM	Pupils up to P7 offered a universal FSM	Total pupils offered a free meal	Additional annual costs for free meal provision	Additional annual UG Costs	Additional annual costs for FSM & UG
<b>£16,000</b>	92,300	130,000	<b>222,300</b>	£103.9m	£0.2m	<b>£104.1m</b>
<b>£17,000</b>	96,000	128,000	<b>224,000</b>	£105.2m	£0.5m	<b>£105.7m</b>
<b>£18,000</b>	99,200	126,100	<b>225,300</b>	£106.4m	£0.7m	<b>£107.1m</b>
<b>£19,000</b>	102,500	124,300	<b>226,800</b>	£107.5m	£0.9m	<b>£108.4m</b>
<b>£20,000</b>	105,800	122,400	<b>228,200</b>	£108.7m	£1.1m	<b>£109.8m</b>

- 16.4 For example, at a net income threshold of £17,000 per year, it is modelled that 96,000 pupils across all school years would be entitled to FSM and UG under the eligibility criteria. In addition, 128,000 pupils up to P7 would be able to access a universal FSM. resulting in 224,000 pupils being offered either a FSM or universal FSM in 2025/26. This is estimated to cost an additional £105.7m to provide the additional free meals in 2025/26 compared to the anticipated costs if the current criteria were unchanged. There would also be an additional £0.5m required to provide UG to those gaining entitlement.
- 16.5 Across primary, post-primary, nursery and special school settings, depending on how much the income threshold is raised, the anticipated number of pupils able to access a FSM (by either meeting the eligibility criteria or by being in the year groups up to P7 who would be offered a universal FSM) in 2025/26 is modelled to be between 222,300 at a £16,000 income threshold and 228,200 at a £20,000 income threshold. This would be between 65% and 67% of full-time pupils across all year groups able to access a free meal each day compared to 27% in 2023/24.
- 16.6 The scale of the increase in meal numbers that would be required in primary schools means there is likely to be a need for the EA to implement a different delivery model. Such a change would be implemented in a phased approach, potentially over several years.



### 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)*

## 17. Option (g) Retain status quo

- 17.1 This option would leave the current eligibility criteria unchanged, including the £15,000 net income threshold for those in receipt of UC.
- 17.2 As explained in detail in section 12, maintaining the same eligibility criteria for FSM and UG is likely to result in a fall in the number of full-time pupils entitled to these supports from 93,400 full-time pupils modelled to be entitled to FSM in 2024/25 to 88,700 full-time pupils in 2025/26. This would be 26% of full-time pupils across all year groups entitled to FSM compared to 27% in 2023/24.

## 18. Potential implications for the EA school meals service

- 18.1 In light of the current severe budget pressures being faced by all government departments in Northern Ireland, it may be very difficult to find the significant additional funding that would be required to take forward many of the options in this paper. Some of the options would have both very significant capital costs and a very significant increase in the recurring annual funding required to deliver the additional meals. Decisions taken as a result of this review will have to take account of the significant funding shortfall for the education system to ensure that any changes are affordable. The current financial context is such that it may be deemed affordable at this point to increase access to FSM and UG. However, as the budgetary position evolves in the years ahead, the income thresholds can be revised as can the extent of any use of universal FSM provision.
- 18.2 The EA is currently facing a range of significant challenges in its delivery of its catering service. These include recruitment and retention of staff, supplier availability, the kitchen and dining facilities available in many schools, transportation of meals and rises in food/staff/energy costs. These issues will increase in scale if more meals need to be provided by the EA catering infrastructure. Depending on the scale of the

rise in the number of meals required, the current service delivery model used by the EA may need to be considered to ensure the service can deliver the additional meals required.

## 19. Conclusion

- 19.1 This document has explained the options for increasing the number of pupils able to access free school meals and uniform grants. The modelling used for this review uses the most recent data available and offers the Department's best estimates for how each option would impact the number of pupils able to access these supports and the annual costs.
- 19.2 By offering your views on how the Department should take forward this important issue, you will be helping inform the Minister's decisions on the way forward. While the severe funding pressures on the education sector will be an important factor when the Minister in making these decisions, he wishes to have all the relevant important information to inform these decisions, including the views of all stakeholders, particularly parents, children and young people and those involved in representing/supporting families.
- 19.3 After this 12 week consultation is completed, the Department will collate all the responses to this consultation and publish a summary of these responses. It is intended that the Minister will make a decision on the way forward ahead of the start of the application period for FSM and UG for the 2025/26 school year. Whether any changes to the eligibility criteria are able to take effect for this academic year will depend on the nature and scale of the changes and the availability of any additional funding required.

## 20. Consultation Process

- 20.1 To help inform the Minister's decision on the way forward on the review of the eligibility criteria for FSM and UG, you are now asked to offer your views on questions that are shown through this document – you are encouraged to provide your responses available using the online facility [Citizen Space](#).
- 20.2 Alternatively, responses can be submitted via email or post to:

Email: [foodinschoolsteam@education-ni.gov.uk](mailto:foodinschoolsteam@education-ni.gov.uk)

Post: Food in Schools Team  
Department of Education  
Rathgael House  
43 Balloo Road

CONSULTATION DOCUMENT FOR THE REVIEW OF FREE SCHOOL MEALS  
AND UNIFORM GRANT ELIGIBILITY CRITERIA

Rathgill  
Bangor  
BT19 7PR

- 20.3 The consultation period will run from Friday 22 November 2024 until 5pm on 14 February 2025. Please note that responses received after the closing date may not be able to be considered.
- 20.4 No personal data will be collected during this consultation. The Department's Privacy Notice is available [here](#).

**You are now asked to go to [Citizen Space](#) to provide your response to the consultation questions.**