

# Representation to Comprehensive Spending Review

September 2020

---

## About this representation

This representation sets out recommendations on free school meals, Healthy Start and holiday food provision which the following organisations strongly support:

School Food Matters, Food Foundation, Bite Back 2030, Save the Children UK, Feeding Britain, Soil Association, Meals & More, Mayor's Fund for London, Church Action on Poverty, Chefs in Schools, Alexandra Rose Charity, Community Shop, FareShare, Food Cycle, Guy's and St Thomas' Charity, LACA: The School Food People, The Bread and Butter Thing

---

## Summary of recommendations

In line with the National Food Strategy (NFS) recommendations, we are advocating that investment in the following three programmes be scaled up in the Comprehensive Spending Review to benefit children living in poverty in England.

1. Expand eligibility for free school meals (FSM) to include children from all families receiving Universal Credit (or equivalent benefits)<sup>1</sup>
2. Extend the Holiday Activity and Food (HAF) programme to all areas in England, to make summer holiday support available to all children receiving FSM
3. Increase the value of Healthy Start (HS) vouchers to £4.25 per week and extend the scheme to every pregnant woman and parent/guardian in receipt of Universal Credit (or equivalent benefits)<sup>2</sup>

Prioritising this package in the spending review will be a significant step on the journey to improving the lives of more than two million additional disadvantaged children and their families in England. The three recommendations reflect those in Part One of the NFS published in late July 2020 that calls for the Government to *'move quickly to shore up the diets of the most deprived children using existing, proven mechanisms'* by providing a *'nutritional safety net'* to those in the poorest households.

With the economy in recession, and as this country rethinks how we support one another in times of crisis, providing this recovery package for families should be a priority for this Government. In the last six months, 14 % of parents have experienced food insecurity, with **4 million** people living in these affected households including **2.3 million children**.<sup>3</sup> In the last month alone, 15% of households with children

---

<sup>1</sup> "Equivalent benefits" is a term drawn from DWP. It covers any of the legacy benefits which Universal Credit is replacing, i.e. working age Jobseeker's Allowance (income-related), Employment and Support Allowance (income-related), Income Support, Child Tax Credit, Working Tax Credit and Housing Benefits

<sup>2</sup> "Equivalent benefits" is a term drawn from DWP. It covers any of the legacy benefits which Universal Credit is replacing, i.e. working age Jobseeker's Allowance (income-related), Employment and Support Allowance (income-related), Income Support, Child Tax Credit, Working Tax Credit and Housing Benefits

<sup>3</sup> Food Foundation data calculated from YouGov Plc. Total sample size was 2309 parents or guardians living with children under 18 years. Fieldwork between 24 August and 1 September 2020. The survey was carried out online. The figures have been weighted and are representative of all UK adults aged 18+.

Population Calculations made by the Food Foundation using mid-year population estimates available on request: <https://foodfoundation.org.uk/new-food-foundation-data-sept-2020/>

have had to take out a loan or borrow money in the last month due to the impact of Coronavirus and 32% have experienced a drop in income as a result of Coronavirus.<sup>4</sup> The upcoming Comprehensive Spending Review is an opportunity for the Government to show it fully grasps the scope of this crisis and is willing to act.

**Targeting spending on these three programmes has three important advantages:**

1. Speed. Each recommendation expands an existing government programme so that, with additional funding, Government can move quickly to respond to the acute level of need, made worse by Covid-19, and to shore up the diets of our nation's most disadvantaged children.
2. Efficiency. These programmes are highly targeted, enabling the Government to efficiently reach those most in need at a time when wider pressures on public finances are high.
3. Alignment with wider Government objectives. Support of the three programmes strongly aligns with the Government's levelling-up agenda and work to tackle obesity, the Government's manifesto commitment to spend £1 billion on childcare support, and the Government's work to help the country recover from Covid-19.

The three programmes would simultaneously help to tackle the challenges of food insecurity, childhood obesity, and inequalities in educational attainment. They would help to ease the strains on the wider welfare system and have knock-on benefits that support the long-term health and resilience of the population.

Alone these programmes will not guarantee the full improvement in the quality of children's diets which is desperately needed, but they form a critical part of the policy package needed.

---

**Recommendation #1 - Expand eligibility for free school meals to include every child (up to the age of 16) from a household where the parent or guardian is in receipt of Universal Credit (or equivalent benefits).**

We believe that one of the greatest levelling-up tools at the Government's disposal is the provision of free school meals (FSM), as it provides vital financial support for low-income families, along with the important health and educational benefits for the children that receive them.

Registering for FSM can save a family around £400 a year per child<sup>5</sup>, which represents a substantial proportion of a struggling family's income. The entitlement to FSM can often be worth significantly more to struggling families than just the direct meal value itself, as the programme can act as a 'passport' to other support for families such as help with the cost of school uniform, trips or music lessons, or discounted access to leisure facilities. Beyond the financial benefits, we know that eating a healthy school meal can improve children's concentration during afternoon lessons, with positive knock-on

---

<sup>4</sup> Food Foundation data calculated from YouGov Plc. Total sample size was 2309 parents or guardians living with children under 18 years. Fieldwork between 24 August and 1 September 2020. The survey was carried out online. The figures have been weighted and are representative of all UK adults aged 18+. Population Calculations made by the Food Foundation using mid-year population estimates available on request: <https://foodfoundation.org.uk/new-food-foundation-data-sept-2020/>

<sup>5</sup> <https://www.childrenssociety.org.uk/what-we-do/resources-and-publications/transitions-into-adulthood-report>

effects on classroom behaviour.<sup>6</sup> Research has also shown that ensuring disadvantaged children have access to nutritious school meals can help them develop healthy eating habits, with the potential to decrease health inequalities later in life<sup>7</sup>.

However, under the current FSM eligibility criteria, not all children from families in poverty or in receipt of Universal Credit are entitled to FSM, as only children from households with an annual income of £7,400 or less are eligible. We wholeheartedly agree with the assessment made in the National Food Strategy<sup>8</sup>, that this threshold is much too low, especially when many of the families on Universal Credit, who currently do not qualify for free school meals, fall well below the Government's own threshold for poverty.

The Covid-19 crisis has made the nation reevaluate what is important. Ensuring children are healthy, happy and able to learn has become paramount once again and we believe now is the time to act. Under the NFS proposal, an estimated 1.5 million additional students aged 7-16 years would benefit from FSM, taking the total number of children to 2.6 million. This is estimated to cost an additional £670 million a year.

We believe expanding the FSM policy to more children also provides an opportunity to put in place a comprehensive monitoring system to demonstrate that money spent truly delivers quality meals for children that meet the Government's school food standards - as a minimum. Holding schools and caterers to account for the nutritional quality of school food will drive up standards and ensure funding has the desired impact on children's health and attainment.

We are aware that such an expansion of FSM may require the Government to support some schools in increasing their kitchen/dining capacity. To give schools and caterers appropriate planning and preparation, we propose the roll-out commences at the start of Easter term 2021 so that a qualifying mechanism can be put in place in line with the 2021/22 fiscal year.

We are also calling for the permanent extension of eligibility of FSM to children from low-income households with no recourse to public funds (NRPF), and undocumented children. We estimate that at least 175,000 children in the UK are in families whose immigration status means they have no recourse to public funds.<sup>9</sup> This means that affected children and families are prevented from accessing in-work and out-of-work benefits such as child benefit, tax credits, Universal Credit, income-related Employment and Support Allowance, income support, local welfare assistance schemes, housing benefit and social

---

<sup>6</sup> See for example: Berlot, M., James, J. (2009) Healthy School Meals and Educational Outcomes Institute for Economic and Social Research Working Paper; School Meals Review Panel (2005) Turning the tables: transforming school food

<sup>7</sup> School Food Trust (2007) School lunch and behaviour: systematic observation of classroom behaviour following a school dining room intervention; School Food Trust (2009) School lunch and learning behaviour in primary schools: an intervention study; School Food Trust (2009) School lunch and learning behaviour in secondary schools: an intervention study

<sup>8</sup> [https://www.nationalfoodstrategy.org/wp-content/uploads/2020/08/8\\_NFS\\_Report\\_RecommendationsInFull.pdf](https://www.nationalfoodstrategy.org/wp-content/uploads/2020/08/8_NFS_Report_RecommendationsInFull.pdf)

<sup>9</sup> These estimations are based on Migration Observatory Data provided to The Children's Society and relate to the NRPF condition being applied to applicants' Leave to Remain. This estimate does not include children who are undocumented.

<https://migrationobservatory.ox.ac.uk/press/a-million-children-in-the-uk-dont-have-british-or-irish-citizenship-and-175000-live-in-families-expected-to-have-no-recourse-to-public-funds/>

housing. Prior to the pandemic, children affected by NRPF from low-income families could not access FSM.

We believe no child should be denied FSM because of their parents' immigration status, and we are greatly concerned that many children from households with no recourse to public funds (NRPF) are more likely to live in deep poverty throughout their childhood. We also know the NRPF condition disproportionately impacts black and minority ethnic children, trapping them in poverty and curtailing their futures.

In April 2020 the Government gave these children temporary access to free school meals during the Coronavirus pandemic.<sup>10</sup> This was welcomed by teachers and campaigners as statistics showed between April to June 2020 there were 5,665 applications to have the NRPF condition lifted<sup>11</sup>, which is more than the combined previous 18 months. This extension recognised that the exclusion of families with NRPF from the welfare system meant that they are especially vulnerable to crises and at a greatly increased risk of extreme poverty.

While much effort is being made to ensure children do not fall behind, without access to free school meals many children in NRPF families will face having to make up for half a year of lost learning on empty stomachs, at a time when they may still be struggling to cope with the economic, mental and emotional aftershocks of lockdown.

Finally, expanding the FSM policy must be *in addition* to Universal Infant Free School Meals (UIFSM). This policy must be retained as a vitally important mechanism for ensuring that our youngest children get the best possible nutrition, and are introduced to healthy eating habits, during their first years at school.

**Recommendation #2 - Extend the Holiday Activity and Food Programme to all areas in England, so that summer holiday support is available to all children in receipt of free school meals.**

The reason for this recommendation is simple; hunger does not recognise school term dates. We know that 1.4 million children in England are currently eligible for FSM, while 3 million children are estimated to be at risk of hunger during the summer holidays. In its current form, the Holiday Activity and Food (HAF) programme only reaches an estimated 50,000 children across 17 local authorities – around 4% of children eligible for FSM.<sup>12</sup>

With the roll-out of HAF in its initial phase following the 2018-2019 pilot years, we believe reforms are required to achieve the scale needed to reach all children entitled to FSM.<sup>13</sup> We see this as part of a

---

<sup>10</sup>

<https://www.gov.uk/Government/publications/covid-19-free-school-meals-guidance/guidance-for-the-temporary-extension-of-free-school-meals-eligibility-to-nrpf-groups>

<sup>11</sup>

[https://assets.publishing.service.gov.uk/Government/uploads/system/uploads/attachment\\_data/file/904641/No\\_Recourse\\_to\\_Public\\_Funds\\_NRPF\\_-\\_Applications\\_to\\_change\\_conditions\\_of\\_leave\\_Q2\\_2020.pdf](https://assets.publishing.service.gov.uk/Government/uploads/system/uploads/attachment_data/file/904641/No_Recourse_to_Public_Funds_NRPF_-_Applications_to_change_conditions_of_leave_Q2_2020.pdf)

<sup>12</sup> <https://www.gov.uk/government/news/thousands-of-children-to-benefit-from-free-meals-and-activities>

longer-term goal of national coverage and all-year-around holiday provision for all children eligible for FSM.

We believe the most effective delivery model would be to distribute resources via local authorities (LAs). This mechanism would allow for food and nutrition to be prioritised, while allowing local flexibility for tailored provision and wrap-around care, sustained through partnerships with schools, caterers, NGOs and others. A recent example of a similar funding distribution model is the Emergency Assistance Grant for Food and Essential Supplies made available to local authorities by Defra in July 2020.

Based on this delivery model, investment of £200 million in HAF through the CSR would allow for an additional two million children eligible for FSM to receive summer holiday provision by summer 2021.<sup>14</sup> Of course, the extension of the programme would require the development of proportionate monitoring and evaluation processes, connected to an intelligent system of accountability, to ensure allocated funding achieves its desired impacts and delivers maximum value for money.

---

**Recommendation #3 - Increase the value of Healthy Start vouchers to £4.25 per week and expand the scheme to every pregnant woman and to all households with children under four where a parent or guardian is in receipt of Universal Credit or equivalent benefits.**

The Healthy Start scheme is designed to support low-income pregnant women and households with children under the age of four to buy fruit, vegetables, milk and infant formula. The value of the voucher has not changed since 2009, despite the rise in inflation, with a current value of £3.10 per child per week (and double that for babies up to 12 months).

This recommendation by the NFS would bring the Healthy Start scheme in line with Scotland's Best Start scheme with the benefits estimated to flow to an additional 290,000 pregnant women and children under the age of four, bringing the total number of beneficiaries to 540,000. This is estimated to cost an additional £110 million a year, with a supporting communications campaign costing £5 million. This investment in England is also likely to influence the expansion of the programme in Wales and Northern Ireland.

If Government improves and expands this scheme, we believe it will incentivise retailers to also add value to the scheme, with a greater diversity of retailers moving to accept the vouchers, and the value and impact of the vouchers being increased through additional offers of healthy food options provided to voucher-holders. We have already seen Iceland step up with its offer of free frozen vegetables to families using Healthy Start vouchers.

---

<sup>13</sup> Including children from NRPF households.

<sup>14</sup> Calculations based on a set of assumptions that slightly diverge from the NFS based on discussions with civil society (BiteBack 2030, Sustain, Mayor's Fund for London, School Food Matters). Calculations use a lower daily cost estimate (£6/per child/per day instead of £21 per child/per day) in line with estimates from existing HAF providers. We assume an average of 80% take-up (an improvement on the current 61% average) amongst the 2.6 million newly eligible children. Calculations are based on 16 days of HAF provision.

We add that rapid progress of the scheme's digitisation is important, including modernising the scheme's application process and introduction of smart card for purchases, to improve take-up and reduce stigma.

---

### **Applicable to all three recommendations**

Given the strong case for children from low-income NRPF families to continue to benefit from the FSM scheme, we see no reason for these children to be excluded from benefiting from holiday provision and the Healthy Start scheme (as well as low-income women with NRPF in the case of HS).

Improved awareness and uptake of each of the three schemes (FSM, HAF, HS) should be supported through a proactive communications push by the Government.

---

We therefore support the NFS in calling on the Government to commit £985 million in support of these three existing policy mechanisms, thereby safeguarding more than 2 million additional disadvantaged children (at a cost of £1.16 per day<sup>15</sup>) from the debilitating impact of food insecurity and poor diet.

---

<sup>15</sup> The total number of additional children benefiting from the three programmes would be 2.3 million at an additional cost of £985,0000 (1.5million children for FSM, 2 million for HAF and 290,000 (including pregnant mothers) for HS. Where there is overlap in FSM eligibility and HAF, this has not been double-counted. This equates to £423 per child/per year or £1.16 per child/per day based on a 365-day calculation. Due to a lack of data, this does not take into consideration the additional children from low-income NRPF households who would need to be counted within the schemes.