



Consortium for the Regional Support for Women in Disadvantaged and Rural Areas

Response to: Holiday Hunger Survey

Issued by: Danny Baker MLA, Sinn Féin

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Foyle Women's
Information
Network



Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas

1. Introduction

1.1 This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, either the Women's Regional Consortium or simply the Consortium), which is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs.

1.2 The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.¹ The seven groups are as follows:

- ♀ Training for Women Network (TWN) – Project lead
- ♀ Women's Resource and Development Agency (WRDA)
- ♀ Women's Support Network (WSN)
- ♀ Northern Ireland's Rural Women's Network (NIRWN)
- ♀ Women's TEC
- ♀ Women's Centre Derry
- ♀ Foyle Women's Information Network (FWIN)

¹ Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisations.

1.3 The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

1.4 The Women's Regional Consortium appreciates the opportunity to respond to Danny Baker MLA's consultation into tackling holiday hunger. We know from our own research with local women on the impact of the Cost-of-Living Crisis² how much food insecurity impacts on the lives of women and families. Cuts to education support and sustained increases in the price of food have intensified levels of food insecurity. **A key priority from Women's Regional Consortium research with 250 local women on the impact of the Cost-of-Living Crisis on their lives was to urgently reinstate the Holiday Hunger Scheme to mitigate against food insecurity for women and children.**

1.5 We wish to endorse the response made by the Women's Policy Group of which we are a member. We fully endorse their response and urge the Department to take their evidence fully into consideration.

² Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium, June 2023
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

2.0 General Information

We wish to highlight the following areas which we believe must be taken into consideration when consulting on the need for legislation to financially support families during school holidays. The wider environment of rising costs for the essentials (especially food inflation) and cuts to funding has undoubtedly had an impact on household finances and the ability of families to pay their bills. Food inflation is a significant concern for women as research shows that women are more likely to have the responsibility for cooking, preparing and shopping for food than men.

2.1 Poverty in Northern Ireland

Nearly 1 in 5 people in Northern Ireland are living in poverty, as 18% (approximately 349,000) people are considered to be in relative poverty and 14% (approximately 271,000) are considered to be in absolute poverty. In relation to child poverty, 24% of children (approximately 109,000) live in relative poverty and 19% of children (approximately 86,000) live in absolute poverty. The increase of relative child poverty from 18% in 2022 to 24% in 2023 indicates a worrying trend.³

Women are generally more likely than men to live in poverty across their lifetimes and lone parents are even more vulnerable to poverty (Census figures show that 93% of lone parents are women). In Northern Ireland the family type at the highest risk of being in relative poverty was 'single with children' at 38%.⁴

A Northern Ireland Audit Office report into Child Poverty in Northern Ireland⁵ found there has been little sustained improvement in child poverty levels since 2016 and that this means that these children are more likely to have poorer health, educational and wellbeing outcomes than their more well-off peers. It also stated that child poverty brings a considerable cost to the public purse, with the estimated annual cost of child poverty between £825 million and £1 billion annually. According to the

³ https://datavis.nisra.gov.uk/communities/PII_report_2223.html#Poverty_Measures

⁴ https://datavis.nisra.gov.uk/communities/PII_report_2223.html

⁵ Child Poverty in Northern Ireland, NI Audit Office, March 2024

<https://www.niauditoffice.gov.uk/files/niauditoffice/documents/2024-03/NI%20Audit%20Office%20Report%20-%20Child%20Poverty%20in%20Northern%20Ireland.pdf>

Northern Ireland Comptroller and Auditor General, *“an investment on reducing child poverty has the potential to result in significant long-term savings for the public purse as well as mitigating future harms caused to children as a result of growing up in poverty.”*⁶

Food banks in the Trussell Trust network in Northern Ireland distributed over 90,300 emergency food parcels in 2023/24. This is the highest number of parcels that the network in Northern Ireland has ever distributed and represents a 11% increase on 2022/23 levels. This percentage increase is higher than the respective figures for England (5%), Scotland (-0.1%), and Wales (1%). This is also the first time that food banks in the Trussell Trust network provided over 38,000 parcels for children in this period. These figures represent more than a doubling (143% increase) in the number of parcels distributed five years ago in 2018/19 and they are far above the levels seen before the rapid increases in the cost of living in 2021/22 (62,600 parcels). This growth in need is higher for children, with the number of parcels provided for them increasing by 151% over the five-year period between 2018/19 and 2023/24.⁷

The Consumer Council for Northern Ireland Household Expenditure Tracker highlights those in the lowest earning households at the bottom 25% of the income distribution have just £49.95 of discretionary income per week after spending on the basics. It also shows that Northern Ireland’s lowest earning households’ gross household income per week is £283.26 per week, 6% lower than the rest of the UK and that income from social security benefits is at 70% in Northern Ireland compared to 61% in the UK.⁸

An ARK research paper⁹ found that around 25% of households in Northern Ireland could not afford to pay an unexpected £500 bill and just over 24% of households reported having to turn the heating down or off due to costs (over half (52.1%) of

⁶ Ibid

⁷ <https://www.trussell.org.uk/news-and-research/latest-stats/end-of-year-stats>

⁸ Northern Ireland Household Expenditure Tracker Q2 2024, April to June, Consumer Council, November 2024

<https://www.consumerCouncil.org.uk/research/q2-2024-northern-ireland-household-expenditure-tracker>

⁹ The Other Division in Northern Ireland: public attitudes to poverty, economic hardship and social security, ARK Research Update, May 2022

<https://www.ark.ac.uk/ARK/sites/default/files/2022-05/update146.pdf>

respondents who described themselves as low income had turned the heating down or off because they could not afford it). Respondents who reported financial hardship were asked to identify how they have been coping and 44.6% reported borrowing from friends and family and 26.6% reported increasing credit card debt.

The ARK research paper also found that almost half (49.3%) of respondents agreed that it was the responsibility of the government to reduce differences in income between people with high and low incomes. It found that 61.7% of respondents disagreed (24.4% strongly disagreed) that the Northern Ireland Executive is doing all that it can to reduce poverty.

2.2 The Impact of the Cost-of-Living Crisis on Women in Northern Ireland

The Women's Regional Consortium and Ulster University carried out detailed research with 250 women in Northern Ireland on the impact of the Cost-of-Living Crisis on their lives and families. A research paper summarising the findings along with a shorter summary document and a topic summary specific to the costs of education are all available on the Women's Regional Consortium website here:

- **Full research paper:**
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>
- **Summary leaflet:**
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/03/The-Impact-of-the-Cost-of-Living-Crisis-on-Women-in-NI-In-Brief-1.pdf>
- **Topic summary on the Costs of Education:**
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/09/Cost-of-Education-Summary-from-Women-Cost-of-Living-Research.pdf>

Women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time and insecure work, more likely to be providing care either for children or other family members which limits their ability to carry out paid work and

more likely to have to make up for cuts to public services through unpaid work. All these factors contribute to keeping women's incomes generally lower over their lifetimes and therefore puts them at greater risk of living on a low-income and in poverty.

Women often bear the brunt of poverty in the home managing household budgets to shield their children from its worst effects. This means that women end up acting as the 'shock absorbers' of poverty going without food, heat or clothes in order to meet the needs of children and/or other family members when money is tight.¹⁰ These actions taken by women are often unseen within the home and given little attention or focus in terms of policy.

"I am now scraping along to provide food and keep a roof over mine and my child's heads. The cost to survive is atrocious."

"Women are the ones who often give up/do without to absorb debt rather than let it impact on their children. I'll do without spuds and put the spud on the child's plate. Women are at the frontline of this."

"Women normally run the house and do the grocery shopping. I'm the one buying the kids their clothes and managing the finances. You take on the financial impact of it and the constant thinking about it."

"I don't think anyone recognises the impact of this Crisis on women especially. We have a high level of responsibility and it's impacting really badly and Government are not taking enough notice. People are suicidal and feel like a failure. I'm lying in bed at night and getting really bad intrusive thoughts to the point where I look at my daughter and think if something happens to me who will look after her? I asked the person in charge in my hostel to ring me in the morning and check if I'm OK. It's really, really impacting on people and Government need to be more aware of the impacts of this Crisis."

"Sometimes you struggle between turning the heating on and feeding the children. As a mother you'd go without to make sure the kids have what they need. I've made dinner sometimes and there hasn't been enough for everyone so I've lied and said it's alright I've eaten so that I can try and make it stretch."

(Quotes taken from Women's Regional Consortium Research on Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)

¹⁰ A Female Face, Fabian Society Blog by Mary-Ann Stephenson, Women's Budget Group, February 2019
<https://fabians.org.uk/a-female-face/>

2.3 Welfare Reform/Austerity Policies and Women

The social security system has a vital role to play in easing the impact of poverty on people and families. As the Covid19 pandemic has shown, people need to be able to rely on the social security system when times get tough and they are hit by unexpected costs or lost earnings. However, the safety net provided by the social security system has been weakened by a decade of welfare reform changes meaning that many people are unable to meet the costs of essential items such as food, heat and clothing and are unable to cope with unexpected life events such as a washing machine breaking down.

Welfare reform and austerity policies have disproportionately impacted on women. Research by the House of Commons Library shows that 86% of the savings to the Treasury through tax and benefit changes since 2010 will have come from women.¹¹ In Northern Ireland an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)¹² showed that across most income levels the overall cash impact of the reforms is more negative for women than for men. Their most striking finding was that households with children experience much larger losses as a result of the reforms than those without children. This is particularly the case for lone parents (who are mostly women) who lose £2,250 on average, equivalent to almost 10% of their net income.

“Government need to increase benefits. There needs to be an increase in income whether people are working through a Living Wage and if you can’t work on a benefits system that gives you enough of an income that you’re able to live and not struggle. At the minute anyone on benefits is existing they’re not living.”

“It would be good if the Government could give people more money in benefits. You are expected to live off what they give you but they couldn’t do it. You have to buy shopping, clothes, gas and electricity with what they give you but you can’t do it. You can’t even afford to get a new pair of shoes, you have to borrow.”

(Quotes taken from Women’s Regional Consortium Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)

¹¹ Estimating the gender impact of tax and benefit changes, Richard Cracknell, Richard Keen, Commons Briefing Papers SN06758, December 2017

<http://researchbriefings.files.parliament.uk/documents/SN06758/SN06758.pdf>

¹² Cumulative impact assessment of tax and social security reforms in Northern Ireland, NIHRC, November 2019

https://www.nihrc.org/uploads/publications/Final_CIA_report_Oct_2019.pdf

2.4 Borrowing and Debt

Borrowing and debt are far from gender neutral. Women are more likely than men to claim social security benefits, more likely to be in low-paid, part-time and insecure work, more likely to be providing unpaid care and more likely to have to make up for cuts to services through unpaid work. As women's incomes are generally lower over their lifetimes this leaves them more vulnerable to short-term financial problems or income shocks making them more likely to have to rely on borrowing and debt to make ends meet.

Research by the Women's Regional Consortium¹³ on Women Living with Debt in Northern Ireland showed that the majority of the women's borrowing had been to fund essential items or to make ends meet. It also found that many (51%) had resorted to high-cost lending and difficulty meeting their debt repayments was a common problem (60%). Worryingly, there were also examples of borrowing through loan sharks including paramilitaries (6%). The impact of the Cost-of-Living Crisis on women's debts was evident in our subsequent research with 60% of the women reporting their debts had been impacted by rising energy prices and 60% also reporting their debts had been impacted by rising food prices.¹⁴

Low-income households are the most vulnerable to debt and increasingly are having to use borrowing to meet everyday expenditure. Research by the Joseph Rowntree Foundation¹⁵ shows that Cost-of-Living increases have hit poorer households the hardest. In the poorest fifth of families 6 in 10 cannot afford an unexpected expense, more than half are in arrears and around a quarter use credit to pay essential bills.

¹³ Women Living with Debt, Women's Regional Consortium, September 2022
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/Women-Living-with-Debt-1.pdf>

¹⁴ Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium & Ulster University, June 2023
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

¹⁵ UK Poverty 2023, Joseph Rowntree Foundation, January 2023
https://www.jrf.org.uk/sites/default/files/jrf/files-research/uk_poverty_2023_-_the_essential_guide_to_understanding_poverty_in_the_uk_0_0.pdf

Paramilitary Lending

Some of the most vulnerable borrowers are forced into using illegal lending or 'loan sharking' because of a more urgent need for money. In Northern Ireland illegal lending is often linked with perceived paramilitary activity.¹⁶ Research conducted by Advice NI on behalf of the Consumer Council¹⁷ in Northern Ireland has highlighted that one of the themes around illegal lending is low income and lack of access to mainstream credit. Two pieces of research by the Women's Regional Consortium¹⁸ with women in Northern Ireland found examples of borrowing through loan sharks including paramilitaries.

There are a range of external factors which can drive people to use illegal lending including paramilitary lending. Welfare reform/austerity policies, a constrained Budget for Northern Ireland which has seen cuts to important areas of support and the impact of the Cost-of-Living Crisis are driving more people to debt.

Research by the University of Ulster found that Universal Credit was repeatedly described as a driver for illegal lending¹⁹ particularly around the harm caused by the five-week wait and issues with short-term benefits loans that were repaid from future benefits. This ensured that benefit claimants were often short of the funds they needed to support their household leading them to look to other means of getting the money they needed.

“I've been to a loan shark – it's not good. The interest they put on. If you miss a payment they are at your door – you don't miss those payments.”

¹⁶ Expensive Lending in Northern Ireland, Centre for Economic Empowerment, NICVA, May 2013
https://www.nicva.org/sites/default/files/d7content/attachments-resources/cee_expensive_lending_in_northern_ireland_2013.pdf

¹⁷ Illegal Lending – The Human Story, Advice NI, September 2019
<https://www.adviceni.net/policy/publications/illegal-lending-human-story>

¹⁸ Making Ends Meet: Women's Perspectives on Access to Lending, Women's Regional Consortium, February 2020
[Making-Ends-Meet-Womens-Perspectives-on-Access-to-Lending.pdf](https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2020/02/Making-Ends-Meet-Womens-Perspectives-on-Access-to-Lending.pdf)
([womensregionalconsortiumni.org.uk](https://www.womensregionalconsortiumni.org.uk))

Women Living with Debt, Women's Regional Consortium, September 2022
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/Women-Living-with-Debt-1.pdf>

¹⁹ Illegal Money Lending and Debt Project, Research Report of Findings, Ulster University and the Consumer Council, March 2020
[Illegal Money Lending Report.PDF](https://www.consumer-council.org.uk/wp-content/uploads/2020/03/Illegal-Money-Lending-Report.pdf) ([consumercouncil.org.uk](https://www.consumer-council.org.uk))

“I have a debt to a paramilitary lender. On every £100 I pay £30. I pay it back every 2 weeks. On £1,000 I pay £300 interest. I work full time but still have difficulty making ends meet on a low income. You ask these lenders can I borrow £1,000 today and they will leave it round to you that night.”

“If you can’t get a bank loan, a Credit Union loan because you have to have savings, or payday loans then after that it’s paramilitaries.”

(Quotes taken from Women’s Regional Consortium Research paper on Women Living with Debt, September 2022)

2.5 Impact of Education Cuts

The Department for Education announced that the Holiday Hunger Scheme would no longer provide support to families (approx. 96,300) entitled to Free School Meals²⁰ during holiday periods (£27 per child, every two weeks). This scheme was set up with cross-party support during the pandemic and pioneered a cash-first approach to provide families with extra support during a crisis. Research by Spyreli et al (2021) which studied the impact of Covid-19 on the food decisions of economically disadvantaged families in NI found that the Holiday Hunger Scheme, together with informal support offered through social circles was crucial for parents, particularly lone parents who needed to reduce costs and feed their family with a limited budget.²¹

The ‘Extended Schools Programme’ which provides support to schools in disadvantaged areas to put in place activities to support children’s learning (which included schools running Breakfast Clubs) has been subject to budget cuts.

A rapid response report detailing the consequences of the cuts to education for children and young people in Northern Ireland²² concluded: *“the evidence presented*

²⁰ The threshold for entitlement for Free School Meals (FSM) is extremely low at £7,400 per year (after tax and not including benefits)

²¹ A qualitative exploration of the impact of COVID-19 on food decisions of economically disadvantaged families in Northern Ireland, BMC Public Health, December 2021
[A qualitative exploration of the impact of COVID-19 on food decisions of economically disadvantaged families in Northern Ireland | BMC Public Health | Full Text \(biomedcentral.com\)](#)

²² An updated perspective on the Cuts to Education and the Consequences for Children and Young People in Northern Ireland, November 2024
<https://pure.ulster.ac.uk/en/publications/an-updated-perspective-on-the-cuts-to-education-and-the-consequen#:~:text=We%20concluded%20that%20the%20cuts,beyond%20the%20brink%20of%20colapse.>

strongly denotes the consequences that the current cuts to education will have on our most disadvantaged children. The schemes which have been removed sought to reduce inequalities and educational underachievement for our young citizens. If we do not urgently invest in education to alleviate the experience of being in poverty and to reduce the cost of the school day, we risk putting up further socio-economic barriers which will increase educational underachievement.” The academics involved in the production of this report further concluded: *“that the cuts would increase poverty, widen existing educational achievement gaps, further exacerbate NI’s mental health crisis and send Special Education Needs provision beyond the brink of collapse.”*

It is also important to recognise the cumulative impact of the public sector cuts across departments including communities, health, and education on the lives of women and their children. The complete removal of additional opportunities to access food in and out of school, coupled with restrictions on the Discretionary Support scheme will remove a crucial safety net for women and those at most risk of falling into financial hardship.

2.6 Other Regional Issues

Research by the Northern Ireland Human Rights Commission outlined that larger family sizes are more common in Northern Ireland. ONS statistics show that 21.4% of families in Northern Ireland have three or more children, compared to 14.7% of families in the UK as a whole.²³

As time goes on, the two-child limit is likely to have a disproportionate impact on families in Northern Ireland. The Department for Communities has estimated that the average number of monthly recipients on Universal Credit and Child Tax Credit affected by the policy will be 14,000 in 2022/23, rising to 16,000 in 2023/24 and 19,000 in 2024/25.²⁴ Households that are impacted by the two-child limit lose just over £287 per month per child.

²³ Cumulative impact of tax and social security reforms in Northern Ireland, NI Human Rights Commission, November 2019, [Final CIA report Oct 2019.pdf \(qub.ac.uk\)](#)

²⁴ Welfare Mitigations Review, Independent Advisory Panel Report, October 2022 <https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-welfare-mitigations-review-independent-advisory-panel-report-2022.pdf>

Figures from the Department for Communities show that nearly one in four children are living in relative poverty (109,000 children) and nearly one in five children in Northern Ireland are living in absolute poverty (86,000 children) meaning they cannot meet their basic needs. Long term trends show that children are at a higher risk of living in poverty than the overall Northern Ireland population in terms of both relative and absolute poverty.²⁵

The impact of ongoing welfare reform policies including the two-child limit, larger family sizes and rising poverty levels in Northern Ireland particularly for children will have impacts on the ability of many low-income families to afford a range of essentials including the cost of school lunches. As outlined throughout this response, women will often be forced to absorb the impacts of these issues by going without essentials to try and provide for their children and families and in some cases will be unable to shield their children/families from the impacts of poverty.

2.7 Concerns about Food Insecurity in Northern Ireland

The impacts of the Cost-of-Living Crisis on the cost of food have been well documented and many low-income families are struggling to afford the essentials including food. Research by the Consumer Council shows 90% of consumers in Northern Ireland are concerned about the rising cost of basics. The cost of home energy tops consumer concerns at 91%, followed by food and non-alcoholic drinks (80%). To cope with these rising costs over a quarter (27%) of consumers reported eating poorer quality or less nutritious food and 24% said they had been skipping meals or eating fewer times in the day (23%).²⁶

Increasing foodbank use has pointed to growing concerns about the levels of food insecurity in Northern Ireland. Food banks in the Trussell Trust network in Northern Ireland distributed over 90,300 emergency food parcels in 2023/24 representing an 11% increase on 2022/23 levels.²⁷ Nearly three quarters (74%) of the support

²⁵ Northern Ireland Poverty and Income Inequality Report, 2022/23, NISRA & DfC, March 2024
https://datavis.nisra.gov.uk/communities/PII_report_2223.html#

²⁶ Consumers' views and behaviours in response to the rising cost of basics, The Consumer Council, March 2024
<https://www.consumercouncil.org.uk/news/90-consumers-concerned-about-rising-cost-basics>

²⁷ Emergency food parcel distribution in Northern Ireland 1 April 2023 to 31 March 2024, Trussell Trust
<https://cms.trussell.org.uk/sites/default/files/wp-assets/EYS-Northern-Ireland-Factsheet-2023-24.pdf>

provided by food banks in Northern Ireland was for families with children. This is significantly higher than the UK average of 65%. Families with three or more children in Northern Ireland are especially likely to face severe hardship, with 37% of parcels provided by food banks in the last year being distributed to families with three or more children, again higher than the UK average (30%).

The Expert Advisory Panel report for a NI Anti-Poverty Strategy advocated for removing the barriers to educational experience by ensuring that participation in school is cost-free. The report recommended that *“Family outgoings can be reduced by ensuring that participation in school is cost-free, by extending free school meals provision to include school holidays, by expanding funding for the provision of breakfast and homework clubs, and by expanding Sure Start provision.”*

A report by academics on the consequences of the cuts to education for children and young people in Northern Ireland²⁸ states that the Holiday Hunger Scheme, Free Period Products Scheme and support for school uniform costs are vital interventions recognising genuine needs in order to mitigate socio-economic barriers to participation in education. It recommends *“these schemes should be immediately reinstated or have full funding restored.”*

A briefing paper by the NI Commissioner for Children and Young People (NICCY)²⁹ outlines concerns about the adequacy of current FSM eligibility criteria as an effective method for targeting the provision of FSM and uniform grants at children in poverty. The paper outlines that entitlement to FSM is a very poor indicator of a child being in poverty in Northern Ireland with two in five (41%) of families in poverty not eligible for FSM between 2017 and 2020. The paper states that it is clear that the current eligibility criteria are inadequate. It 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

²⁸ The Consequences of the Cuts to Education for Children and Young People in Northern Ireland, June 2023
<https://www.stran.ac.uk/wp-content/uploads/2023/06/The-Consequences-of-the-Cuts-to-Education-for-Children-and-Young-People-in-Northern-Ireland-Final.pdf>

²⁹ Briefing on Free Schools Meals Eligibility in Northern Ireland, NICCY, February 2025
<https://www.niccy.org/wp-content/uploads/2025/02/NICCY-Briefing-on-FSM-Analysis-January-2025.pdf>

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.

NICCY recommends that 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. NICCY also call for the requirement for families to be in receipt of state benefits to be removed as a criteria for FSM. They call for eligibility to be based solely on income levels, equivalised by family size stating 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.

The NICCY briefing states: *“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.”*

A recently published report on Child Poverty on the island of Ireland³⁰ has found that *“Northern Ireland’s long-standing provision of free school meals to children in low-income households was recognised as an important direct support, with calls from stakeholders to expand these benefits during holiday periods and make them universal.”*

³⁰ Child Poverty on the island of Ireland, Economic & Social Research Institute, January 2025 <https://www.esri.ie/system/files/publications/RS199.pdf>

It is noteworthy that an evaluation of the school meals programme in the Republic of Ireland has recommended that there should be a Universal School Meals Programme, with one free hot meal for every child in Ireland.³¹ This follows the establishment of a European Child Guarantee with the objective to prevent and combat social exclusion by guaranteeing effective access of children in need to a set of key services including healthy nutrition. The EU Child Guarantee states that Member States should ensure that every child in need gets effective access to at least one healthy meal each school day.³²

2.8 Move to Universal Credit and eligibility for Free School Meals for those who are self-employed

The Move to Universal Credit has meant that Universal Credit has become an important passport benefit for accessing help with Free Schools Meals. However, there are well documented problems for those who are self-employed with entitlement to Universal Credit, for example, farming families seasonal workers, tradespeople and some childminders. The self-employed are a considerable part of the Northern Ireland economy with Census figures showing that 15% of those in employment in Northern Ireland were self-employed (127,200 people).³³

Rather than being based on annual income Universal Credit is based on monthly income and where there is a cash surplus in a month (for example, because of livestock sales) it could mean no Universal Credit entitlement that month. In addition, in months where there is little/no income Universal Credit has a 'Minimum Income Floor'. The Minimum Income Floor is an assumed level of earnings that the Department for Communities uses to calculate benefit payments for self-employed people. If earnings are below the Minimum Income Floor, Universal Credit payments will be calculated using this figure rather than actual earnings that month. The

³¹ Evaluation of the School Meals Programme, Department of Social Protection, December 2022 <https://www.gov.ie/pdf/?file=https://assets.gov.ie/251427/6b3e8499-4cca-4f32-aa7d-cbcad0b660e2.pdf#page=null>

³² https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L_.2021.223.01.0014.01.ENG&toc=OJ%3AL%3A2021%3A223%3ATOC

³³ Main statistics for Northern Ireland, Statistical bulletin, Labour market, March 2023 <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-3-statistical-bulletin-labour-market.pdf>

Minimum Income Floor is calculated by multiplying the amount of the National Minimum Wage by the number of hours normally worked.

There are some transitional provisions to help ease the move to Universal Credit for the self-employed including a 12-month exemption from the Minimum Income Floor. However, as is highlighted by a report published by Advice NI, Rural Support and the Ulster Farmers' Union³⁴ the Minimum Income Floor is an artificial figure which punishes the self-employed: *“the notion of earning a net minimum.....per month is utterly foreign to the farmer who is losing money on cultivating his produce for market 10 months of the year; for the child-minder who doesn't work over the summer, as her employing family don't need her; or for the builder who gets paid on completion of projects which can vary from weeks to months in length. The overriding effect of the Minimum Income Floor will be to persecute hard-working, self-employed people for not having a regular income stream.”*

Moving to Universal Credit can have negative implications for self-employed people who don't have a regular income each month and for those living in rural areas who are more likely to be self-employed. As the National Farmers' Union has stated Universal Credit does not account for the seasonal nature of farm business income where for example a farmer may lamb sheep in the Spring but sell them in the Autumn and therefore have no income until the Autumn.³⁵

Problems with moving to Universal Credit have been highlighted in a NISRA report into non-movers from Tax Credits to Universal Credit³⁶ which found that being self-employed had an influence on claim decision. Table 8 from the NISRA report (see below) showed that self-employed Tax Credit customers had a 16 percentage point lower Universal Credit claim rate than non self-employed people. Controlling for other factors having at least one claimant in a household being self-employed reduces the probability of claiming Universal Credit by 12 percentage points.

³⁴ Universal Credit in Northern Ireland: Punishing the Self-Employed, Advice NI, Rural Support & the Ulster Farmers' Union, December 2016

<https://www.adviceni.net/sites/default/files/2021-05/Advice%20NI%20Social%20Policy%20Report.pdf>

³⁵ <https://www.nfuonline.com/updates-and-information/universal-credit-changes/>

³⁶ Move to Universal Credit (UC) Tax Credit Non-Movers Research, NISRA, 2024

<https://www.communities-ni.gov.uk/system/files/2024-12/dfc-move-to-uc-tax-credit-non-movers-research-report.pdf>

Table 8 Move to UC Invitations, Claims and Rate by Employment Status

Employment Status	Invitations	Claims	Rate
Self-employed households	7,499	4,271	57.0%
Non-Self-employed households	21,083	15,463	73.0%

The following example from South Tyrone Empowerment Programme (STEP) in Dungannon highlights the issues for farming families, entitlement to UC and help with free school meals:

A farming couple with 3 school age children were in receipt of Child and Working Tax Credits but had to move to Universal Credit. After two months UC stopped due to surplus earning rules. The issue was the family were due to buy stock for the farm with the earnings but the process was delayed a week meaning the money was in their account during the assessment period. This wiped out their UC award and therefore their entitlement to free school meals and school uniform grants. This was devastating as they needed to invest in the farm to make it sustainable.

(The STEP adviser noted that this has been the case for many farming families. Some of these families are working other jobs to keep the farm going but the assessment period and reporting for UC is punishing them as it is not a true reflection of annual income. The adviser also noted that accountants are charging for additional work involved in UC and there is no consistency across UC/JBO offices on reporting (what is and is not counted as income). There is a lack of information provided to the self-employed and farming community on the Move to UC who are coming from a Tax Credits system that asked no questions about income or property or even being registered as self-employed).

3.0 Specific Questions

1. Do you agree that children and young people are more likely to do well in school if their family has greater food security during school holiday periods?

- Agree
- Disagree
- Don't know

We strongly agree with this statement and there is substantial research that links poverty with poor educational and health outcomes. A Northern Ireland Audit Office report into Child Poverty in Northern Ireland³⁷ stated:

“Growing up in poverty can have a significant impact on health, education and economic outcomes. Evidence shows that the gap in attainment between children growing up in poverty and their peers starts early and lasts throughout school. By the time they reach primary school, children from low-income families are already up to a year behind middle income children in terms of cognitive skills. The relationship between health and income levels is also well established. Research has shown that childhood poverty is linked to higher levels of infant mortality and death in early adulthood, as well as poorer mental health, obesity and chronic illness. Children growing up poor are also more likely to continue to experience poverty in adulthood, and so it is important to break the cycle at as early a stage as possible.”

We also point to a report produced by academics on the impact of cuts to education and the consequences for children and young people in Northern Ireland³⁸ which states that: *“Tackling hunger in schools is an important step to mitigating the growing disadvantage attainment gap, particularly as data from Trussell NI shows that thousands more children have been using foodbanks, which evidence shows*

³⁷ Child Poverty in Northern Ireland, NI Audit Office, March 2024
<https://www.niauditoffice.gov.uk/files/niauditoffice/documents/2024-03/NI%20Audit%20Office%20Report%20-%20Child%20Poverty%20in%20Northern%20Ireland.pdf>

³⁸ An updated perspective on the Cuts to Education and the Consequences for Children and Young People in Northern Ireland, November 2024
https://pure.ulster.ac.uk/ws/portalfiles/portal/214699254/A_response_to_the_Northern_Ireland_Programme_for_Government_Nov_2024.pdf

correlates with lower grades at GCSE. It is therefore crucial that the School Holiday Food Grant is urgently reinstated and moreover that the Labour Government's Breakfast Club initiative is extended to Northern Ireland."

2. Do you agree that free school meal support over school holidays would alleviate some financial pressure experienced by low income families?

- Agree**
- Disagree**
- Don't know**

We strongly agree with this statement. Following the cut to the SHFG scheme 'holiday hunger' payments to the families of 96,000 children eligible for free school meals of £27 per child each fortnight during the school holidays stopped. This led many low-income families to struggle even more to afford food particularly over the summer months.³⁹

We point to research carried out by the Women's Regional Consortium⁴⁰ outlined in Section 2.2 of this response on the impact of the Cost-of-Living Crisis on Women where one of the major findings was food insecurity. The Cost-of-Living Crisis and rising food prices has meant that many low-income women have seen their household budgets being squeezed with many struggling to afford essentials including food. 43% of the women who took part in the research reported skipping meals to try and cope with rising prices to ensure that their children and families were fed. The key findings from this research were:

- 75% of the women said they were having the most difficulty paying for their food shopping
- 89% said the price increases which had the biggest impact on their household budget were food bills and 90% said energy bills.

³⁹ <https://www.bbc.co.uk/news/uk-northern-ireland-66399979>

⁴⁰ Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium, June 2023
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

- 56% were in debt and of these 82% said they had to borrow as a result of cost of living increases.
- 90% felt that the Cost-of-Living Crisis had impacted on their physical or mental health or both.
- Of those who had children, 78% felt that cost of living increases had negatively impacted on their children.
- 78% of the women said they felt cold or hungry or both as a result of cost of living increases.
- 41% needed to use a foodbank/other charitable support due to increases in the cost of living.

“I can’t go to the butchers for meat it’s too expensive. I have to go to the supermarket and look for yellow stickers.”

“In our local shop it is £1.95 for milk – you used to be able to get 2 for £2. I go through a thing of milk and a loaf of bread a day with the kids.”

“The weekly shop has gone up, it’s not 1p or 2p it’s 20p/30p sometimes 50p an item.”

“The price of bread I genuinely can’t get over it! I would usually try and buy the own brand bread but they don’t always have it.”

“You notice now it’s not just a couple of pence that things have went up its way more than that. You used to be able to get six bread rolls for £1 now you’re getting 4 for £1.50 for exactly the same rolls. Toilet rolls are the same, it’s unbelievable.”

“They need to provide free school dinners for all children. I can’t keep up to £2.70 a day for my two kids all week.”

“My kids go to Breakfast Club in school and that’s a godsend. If I didn’t have that I don’t know what I’d do. There are times I’ve went three or four days with very little to eat, maybe I’d grab an apple just so I have something in my stomach and I’m not going to bed with hunger pains and growling in my stomach.”

(Quotes taken from Women’s Regional Consortium Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)

We again point to the report on the impact of cuts to education and the consequences for children and young people in Northern Ireland⁴¹ which we referenced in Section 2.5 of this response. This report states:

“New research published by the Covid Social Mobility and Opportunities (COSMO) study (based at London School of Economics), which is following 13,000 young people, provides compelling evidence of the impact of food insecurity on educational attainment. Pupils in families who reported using foodbanks during the pandemic received lower GCSE grades (almost half a grade per subject), even taking into account past grades and other features of their household finances, with long-term disadvantage being a more significant factor than the pandemic. The same study also shows that rates of psychological distress were substantially higher in households who started using foodbanks during the pandemic (53% among young people and 63% among parents) (Cullinane et al., 2023). This vividly demonstrates the long-term impact of food insecurity on both educational attainment and on mental health, which supports Spyreli et al’s (2021) conclusion that further food related support is needed to mitigate the increased risks of food insecurity for economically disadvantaged children.”

3. Do you agree that greater food security would have a positive impact on the physical and mental health of children and young people?

- Agree**
- Disagree**
- Don't know**

We strongly agree with this statement. Women’s Regional Consortium research on the impact of the Cost-of-Living Crisis on Women⁴² showed that of the women that

⁴¹ An updated perspective on the Cuts to Education and the Consequences for Children and Young People in Northern Ireland, November 2024
https://pure.ulster.ac.uk/ws/portalfiles/portal/214699254/A_response_to_the_Northern_Ireland_Programme_for_Government_Nov_2024.pdf

⁴² Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, Women’s Regional Consortium, June 2023
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

had children who took part in the research, 78% felt that cost of living increases had negatively impacted on their children. It was clear through this research the hugely negative health impacts that rising prices for the essentials was having on women with 90% of the women we spoke to reporting that rising prices had impacted on their physical or mental health or both. In many of these households the children and young people will pick up on the stress and anxiety felt by their parent/parents in trying to make ends meet as a result of living on a low-income and coping with rising prices for the essentials.

We point to the Northern Ireland Audit Office report on Child Poverty in Northern Ireland⁴³ which highlights how poverty negatively affects children’s physical and mental health: *“The relationship between health and income levels is well established. Research has shown that childhood poverty is linked to higher levels of infant mortality and death in early adulthood, as well as poorer mental health, obesity and chronic illness. Families living with low incomes may not be able to afford the resources needed to live a healthy lifestyle, for example healthy food, good-quality housing and sufficient heating.”* This report also references Department of Health published statistics on health inequalities in Northern Ireland⁴⁴ which show that *“in the most deprived areas, boys can expect to live 11 fewer years in ‘good’ health, and girls 15 fewer years, than children in the least deprived areas.”*

4. Do you agree that legislation should be developed to address holiday hunger by ensuring that children and young people who are eligible for free school meals should have this entitlement, or payment in lieu of this entitlement extended to cover school holiday periods?

- Agree**
- Disagree**
- Don't know**

⁴³ Child Poverty in Northern Ireland, NI Audit Office, March 2024
<https://www.niauditoffice.gov.uk/files/niauditoffice/documents/2024-03/NI%20Audit%20Office%20Report%20-%20Child%20Poverty%20in%20Northern%20Ireland.pdf>

⁴⁴ <https://www.health-ni.gov.uk/sites/default/files/publications/health/hscims-report-2023.pdf>

We strongly agree with this statement. However, there are problems with the existing eligibility criteria for Free School Meals which could result in low-income families, children and young people missing out on this important help as we have outlined in Section 2.7 and 2.8 of this response.

A briefing paper by the NI Commissioner for Children and Young People (NICCY)⁴⁵ outlines concerns about the adequacy of current FSM eligibility criteria as an effective method for targeting the provision of FSM and uniform grants at children in poverty. The paper outlines that entitlement to FSM is a very poor indicator of a child being in poverty in Northern Ireland with two in five (41%) of families in poverty not eligible for FSM between 2017 and 2020. The paper states that it is clear that the current eligibility criteria are inadequate

NICCY calls for the requirement for families to be in receipt of state benefits to be removed as a criteria for FSM. They call for eligibility to be based solely on income levels, equivalised by family size stating 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.

The NICCY briefing states: *“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..... 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.”*

If Universal Credit is to be used as the main passporting benefit to qualify (given the Move to UC) there must be some acknowledgement of the difficulties that some families experience in accessing Universal Credit. As we have outlined in Section 2.8 moving to UC often has negative implications for self-employed people who don't have a regular income each month and it applies a Minimum Income Floor which

⁴⁵ Briefing on Free Schools Meals Eligibility in Northern Ireland, NICCY, February 2025
<https://www.niccy.org/wp-content/uploads/2025/02/NICCY-Briefing-on-FSM-Analysis-January-2025.pdf>

also punishes the self-employed. This is particularly the case for those living in rural areas who are more likely to be self-employed including farming families. Research carried out by NISRA⁴⁶ in relation to this shows that self-employed Tax Credit customers had a lower Universal Credit claim rate than non-self-employed people. Without a change to the eligibility criteria that specifically addresses this issue for the self-employed many families who need this help will be excluded from it.

In addition, the Anti-Poverty Expert Advisory Panel report⁴⁷ advised that proposals for weekly non-taxable child payments between £12.50 and £15 for disabled children should be extended up to the age of 20 to ensure that families with d/Deaf and disabled children or young people can receive a higher income to support their child in the transition years to adulthood. This report recommends that young d/Deaf and disabled people who have incomes below the poverty line should receive support until they are 24 similar to the provisions within The Family Fund. We recommend that this should also be considered for disabled children in relation to the SHFG scheme.

5. If you agree that children and young people who are eligible for free school meals should have this support extended throughout school holiday periods, what form should this support take?

- Regular payments equivalent to the cost of free school meals**
- Meal**
- Food voucher**
- Other**

We strongly support a cash-first approach for these payments. This gives families dignity and choice in relation to buying food for their children. We are strongly opposed to vouchers which introduce stigma and could deter families from accessing this help. As outlined in the report on the impact of cuts to education and the

⁴⁶ Move to Universal Credit (UC) Tax Credit Non-Movers Research, NISRA, 2024
<https://www.communities-ni.gov.uk/system/files/2024-12/dfc-move-to-uc-tax-credit-non-movers-research-report.pdf>

⁴⁷ <https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-anti-poverty-expert-advisory-panel-recommendations.pdf>

consequences for children and young people in Northern Ireland⁴⁸ “*NI arguably led the way by implementing a NI wide cash-first approach which provided families with the dignity of choice and control (Patrick et al, 2021).*” We would like to see Northern Ireland lead the way again by providing these payments on a cash-first basis.

6. If you selected “regular payments equivalent to the cost of free school meals”, when do you think the payment should be made?

- Weekly**
- Fortnightly**
- Other (please specify)**

We know from our research with women that their household budgets are extremely tight. Low levels of income from social security benefits and from work mean that many struggle to make ends meet. We hear numerous reports of women going without food, heat and other essentials when it gets close to “pay day”. Making these payments weekly would allow those on the lowest incomes to budget better and ensure that they have a regular weekly payment which they could rely on towards the cost of food.

7. How do you think regular payments should be made?

- Directly to bank accounts**
- Cheque**
- Other (please specify)**

8. Between July 2020 and April 2023, funding was provided to enable the Department of Education to pay School Holiday Food Grants (SHFG), as part of wider efforts to tackle holiday hunger and food poverty. Do you agree that this scheme worked well and helped to address pupil well-being and educational outcomes?

⁴⁸ An updated perspective on the Cuts to Education and the Consequences for Children and Young People in Northern Ireland, November 2024
https://pure.ulster.ac.uk/ws/portalfiles/portal/214699254/A_response_to_the_Northern_Ireland_Programme_for_Government_Nov_2024.pdf

- Agree
- Disagree
- Other (please specify)

We agree that the previous SHFG scheme worked well and helped to tackle holiday hunger and food poverty. As outlined in the report on the impact of cuts to education and the consequences for children and young people in Northern Ireland⁴⁹ *“NI arguably led the way by implementing a NI wide cash-first approach which provided families with the dignity of choice and control (Patrick et al, 2021).”*

The success of the SHFG was also highlighted in the media by Kayleigh Martin who was receiving the payments for her four-year old son Karló who has special educational needs. She spoke about the loss of the payments to the BBC:

“It was a great help when you were getting it because you weren’t having to worry as much, but now you have to plan everything right down to the penny really.”

“The cost of bread, milk, pancakes, yoghurts - those kind of things - that’s all gone up in price.”

She said every single day was a challenge with *“very little support out there”*.

“You try and try and try every day and you just feel like you’re banging your head against a brick wall,” she said.⁵⁰

⁴⁹ An updated perspective on the Cuts to Education and the Consequences for Children and Young People in Northern Ireland, November 2024
https://pure.ulster.ac.uk/ws/portalfiles/portal/214699254/A_response_to_the_Northern_Ireland_Programme_for_Government_Nov_2024.pdf

⁵⁰ <https://www.bbc.co.uk/news/uk-northern-ireland-66399979>

9. The School Holiday Food Grant (SHFG) scheme provided a payment in lieu of free schools meals at the rate of £2.70 per school day, per child, on a fortnightly basis. This equated to a fortnightly payment of £27. Do you believe this amount is sufficient in the context of extending this support to cover school holiday periods?

- Yes
- No
- Other (please specify)

Throughout our response we have provided evidence of the impact of the Cost-of-Living Crisis and rising prices for food on women, children and families. While inflation has reduced since it peaked at over 11% in October 2022 (inflation for food and non-alcoholic beverages was even more pronounced, peaking at 19.2%) prices have not come down to pre-Crisis levels.

The latest results from the Food Foundation's Broken Plate report 2025⁵¹ show that on average healthier foods are more than twice as expensive per calorie as less healthy foods, with healthier food increasing in price at twice the rate in the past two years. To afford the government-recommended healthy diet, the most deprived fifth of the population would need to spend 45% of their disposable income on food, rising to 70% for those households with children.

Predictions for food inflation in the future also give cause for concern. As reported by the Food Foundation⁵² a study by BravoVoucher predicts that the cost of everyday food items is set to surge by 2030, with staple products like olive oil expected to reach between £9.05 and £17 per bottle. Olive oil has already experienced the largest price increase, soaring by 113.8% between 2019 and 2024. Baked beans have also seen a significant rise, with prices climbing by 70.5% during the same period, potentially costing around £1.77 per tin by 2030. Vegetables are also of concern. For example, broccoli which is currently averaging £2.50 per kg,

⁵¹ The Broken Plate 2025, The Food Foundation, January 2025
https://foodfoundation.org.uk/sites/default/files/2025-01/TFF_The%20Broken%20Plate%202005%20FINAL%20DIGITAL.pdf

⁵² <https://foodfoundation.org.uk/news/food-prices-tracker-august-2024>

could rise to £3.32 per kg by 2030 if inflation rates remain steady, or £2.82 if economic conditions improve according to the study. Other common household items, such as semi-skimmed milk, whole chicken, and powdered baby formula, are also expected to see significant price increases by 2030.

Given the trajectory of price rises for food, particularly healthy food, there is a real need to supplement the incomes of low-income children and families to ensure that they can afford healthy, nutritious food.

“I spend £20 on fruit and it only lasts a couple of days. I have twins and £20 does not give me enough fruit for them, they love fruit. You can go to McDonalds and get a Happy Meal for £2.19 and there’s a wee bit of fruit in it. No matter what fruit should you go to get you’re spending £20/£30 it’s crazy.”

“You can go to Iceland and get a full trolley of junk food – processed chicken nuggets, waffles, junk like that. I love cooking fresh – fruit and vegetables, fish and now you can’t afford it. It’s so much harder now to give the kids that fresh stuff. It’s £4 for two bits of salmon and my son could eat that on his own.”

“Fruit and vegetables are really expensive. You can run into Iceland and grab pizzas for cheaper. You’re forced to buy more unhealthy food.”

(Quotes taken from Women’s Regional Consortium Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)

10. If you do not agree with the proposal as outlined, what alternative would you suggest that would achieve the policy objective or what adjustments could be made which would achieve your support?

- Are you responding as an individual?
- Are you responding on behalf of an organisation?

Alternative proposal:

N/A.

11. Please confirm you have read this Privacy Notice to this consultation which explains how your personal data will be used.

I have read the privacy notice