

# Written evidence submitted by Children's Food Campaign

## About Children's Food Campaign

Children's Food Campaign (CFC) aims to improve children and young people's health by campaigning for policy changes that promote healthy and sustainable food environments. Part of the Sustain alliance for food and farming, the Children's Food Campaign is supported by over 100 UK-wide and national organisations, including children's and health charities and professional bodies, trade unions, school food experts and environmental organisations.

## Scope of our submission

Our submission focussed on the last two questions in the request for evidence:

- *The effect on disadvantaged groups, including the Department's approach to free school meals and the long-term impact on the most vulnerable groups*
- *What contingency planning can be done to ensure the resilience of the sector in case of any future national emergency?*

## SUMMARY OF RECOMMENDATIONS

### General

- The Department for Education should prioritise and guide support to schools to use or re-establish existing school food catering arrangements wherever possible, which allows for schools to maintain good contact and surveillance with their pupils and their families.
- The Government must end the incentive to adopt the national voucher system, by clearly establishing the same level of support and funding for schools and local authorities implementing their own local free school meal solutions (whether catered, alternative voucher or cash-based payments).
- The Government should immediately announce funding to extend provision of free school meals to forthcoming school holidays. We advocate a centralised funding mechanism (similar to that established in Wales) by which each state-funded school will be disbursed with a premium based on eligible pupil numbers, equivalent to £19.50 per child per week. Schools may then disburse a combination of holiday activities, catered meals, food hamper deliveries, vouchers or cash payment alternatives, according to their own assessed needs of eligible children and their families, and report on its use in a similar manner to pupil premium.
- The Government should ensure all schools that incurred additional exceptional costs during May half-term in order to continue to provide food or financial support to families in need are able to apply for reimbursement of these costs.
- In light of extended hardship encountered by millions of families during the crisis, the Government must ensure universal infant free school meals (UIFSM) are immediately reinstated and properly funded as soon as schools reopen.
- In order to reinvigorate the public sector catering industry economy, and in order to provide for much higher proportion of children likely to be in need of a free school meal during 2020-21, we advocate considering extension of free school meals to all primary

age children, as well as for all secondary school students from households in receipt of Universal Credit, with no lower threshold.

- The government must extend Free School Meals to the thousands of undocumented children from families with NRPf who do not receive support under Section 17 of the Children's Act 1989.
- Commit to extending eligibility to Free School Meals to all children living in poverty and food insecurity, regardless of immigration status, so that the current 'temporary' extension of eligibility to children with NRPf is not rescinded when schools reopen.
- The Government must establish a review of the lessons learned from the introduction of a single national school voucher programme, and whether there are alternative mechanisms (eg. prepayment cards, Paypoint or cash transfers, or local voucher purchases) that would serve the needs of vulnerable families more immediately and efficiently.
- Income from the Soft Drinks Industry Levy should continue to be ring-fenced for programmes to increase access to healthy food, including a new round of devolved funding to local authorities and schools to enable school kitchens, food growing, holiday initiatives and breakfast clubs and nutritional education programmes to be established.

### **The effect on disadvantaged groups, including the Department's approach to free school meals and the long-term impact on the most vulnerable groups.**

The association between children's consumption of healthy, fresh meals, and children's ability to study and achieve academically, to behave well in school, and to reduce risk of unhealthy weight or diet-related illness, is well established<sup>1</sup>. These insights informed the development of the School Food Plan, the adoption of national School Food Standards, the establishment of free school meals for those more disadvantaged pupils, as well as the adoption of Universal Infant Free School Meals since 2014.

It's clear that the Department for Education was not prepared for the impact that the closure of schools from 23 March would have on children receiving free school meals. Prior to the Coronavirus outbreak, the Food Foundation estimated that more than 1.6 million people were already facing food insecurity. It is also estimated that one million children aged 7-16 live in food insecure households but do not receive free school meals.

Data from the Department for Education shows that on day 1 of school closures (23 March) 3.7% (330,000) pupils were attending school, and was at 2.6% by Thursday 21 May<sup>2</sup>. With the return of some pupils in Reception, Y1 and Y6 from 1 June, this rose to 6.9% of all school

<sup>1</sup> Department for Education, National Centre for Social Research (2013) *Evaluation of the School Meals Pilot*. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/184047/DFE-RR227.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/184047/DFE-RR227.pdf)

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/887357/Attendance\\_in\\_education\\_and\\_early\\_years\\_settings\\_during\\_the\\_coronavirus\\_COVID-19\\_outbreak\\_22\\_May.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/887357/Attendance_in_education_and_early_years_settings_during_the_coronavirus_COVID-19_outbreak_22_May.pdf)

pupils. Throughout the crisis, the vast majority of children were at home, requiring some form of alternative free school meal offer to be provided<sup>3</sup>.

In the first three weeks of the COVID-19 lockdown three million people were reported to have gone hungry with half of this group not having eaten for a whole day.<sup>4</sup> Preliminary data suggests those who are most affected by household food insecurity linked to COVID-19 are adults with disabilities, black and minority ethnic individuals, and families with children.<sup>5</sup> On 4 May 2020, Work and Pensions Secretary Therese Coffey confirmed that there had been 1.8 million new applications for Universal Credit since 16 March<sup>6</sup>.

### **Vulnerable families' eligibility for free school meals during the emergency**

The Government guidance has only related to children 'eligible for benefit-related free school meals', which omits children in Reception, Year 1 and Year 2 who were previously in receipt of Universal Infant Free School Meals. Whilst we accept the logic of DfE prioritising the needs of the most vulnerable children, it failed to recognise the large numbers of children in the UK living in food insecure households not eligible to receive free school meals. On 3 May 2020, the Food Foundation's Covid19 tracking research estimated that 5 million households with children were experiencing food insecurity, and an estimated 200,000 children had skipped meals due to inability to access food during lockdown<sup>7</sup>. This revealed that around 31% of families eligible for free school meals had not received any substitute food, voucher or cash payment, whilst 12% of those who had been offered the government's Edenred national school meals voucher had not been able to redeem them.

Furthermore, children in the 1.8 million households who have recently applied for Universal Credit, as well as those with no recourse to public funds, were not included in pre-existing pupil premium lists. DfE guidance leaves decisions over which families to feed to head teachers' own discretion. Education Minister Vicky Ford announced on 23 April that Schools should seek to serve the needs of families who had applied for Universal Credit, prior to their evidence being assessed. However, under rules introduced in April 2018, these families would have to meet the new eligibility net income threshold of £7,400 in order to qualify. This effectively put schools in the position of having to provide meals to children, without any guarantee that the money involved would be reimbursed<sup>8</sup>.

### Children with no recourse to public funds

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<sup>3</sup> <https://www.gov.uk/government/publications/coronavirus-covid-19-attendance-in-education-and-early-years-settings>

<sup>4</sup> ENUF, Kings College London, Food Foundation (2020) Vulnerability to Food Insecurity Since COVID-19 lockdown. Preliminary report. [https://foodfoundation.org.uk/wp-content/uploads/2020/04/Report\\_COVID19FoodInsecurity-final.pdf](https://foodfoundation.org.uk/wp-content/uploads/2020/04/Report_COVID19FoodInsecurity-final.pdf)

<sup>5</sup> ENUF, Kings College London, Food Foundation (2020) Vulnerability to Food Insecurity Since COVID-19 lockdown. Preliminary report. [https://foodfoundation.org.uk/wp-content/uploads/2020/04/Report\\_COVID19FoodInsecurity-final.pdf](https://foodfoundation.org.uk/wp-content/uploads/2020/04/Report_COVID19FoodInsecurity-final.pdf)

<sup>6</sup> <https://www.gov.uk/government/speeches/dwps-response-to-coronavirus-covid-19>

<sup>7</sup> Food Foundation, 3 May 2020 <https://foodfoundation.org.uk/new-food-foundation-survey-five-million-people-living-in-households-with-children-have-experienced-food-insecurity-since-lockdown-started/>

<sup>8</sup> <https://schoolsweek.co.uk/coronavirus-schools-can-feed-pupils-without-evidence-of-universal-credit-claim-says-minister/>

As a result of a legal action brought by law firm Deighton Pierce Glynn, and in response to the Covid-19 pandemic and campaigning by civil society groups, the government temporarily extended free school meal provision on a temporary basis to include certain categories of children whose families are subject to restrictions with “no recourse to public funds” (NRPF)<sup>9</sup>. However, the extension of FSM to children from households under NRPF is only ‘temporary’, whilst the situation of the children from these households will not have changed in economic or social terms<sup>10</sup>.

In a letter sent to the Secretary of State for Education on 30 April, Sustain and School Food Matters outlined some of our key concerns with this new policy.<sup>11</sup> Firstly, a maximum income threshold initially set at £7,400 meant household could only earn a maximum of £616 a month. Whilst this appeared the same as for other eligible families, income for the latter is then topped up by welfare payments such as Universal Credit or child tax credit, all of which families with NRPF are unable to claim. It was only on Thursday 28 May 2020, under threat of further court action, that the Government accepted this inequality and revised the threshold of eligibility to £16,190.

The extension of the eligibility to receive free school meals is not for all children with NRPF. Thousands of undocumented children in families who do not receive support under Section 17 of the Children’s Act 1989 remain excluded. Finally, the support is going to be rescinded as soon as schools are open to all pupils regardless of whether children with NRPF still need the support meaning that children will go hungry.

Some Local Authorities and devolved administrations are providing additional discretionary support to children with NRPF. The Welsh Government has stated that regarding families with NRPF they “strongly encourage local authorities to exercise their discretion to allow the children of these families to benefit from local authority free school meal provision for the duration of school closure.”<sup>12</sup>

### **Recommendations:**

- Extend Free School Meals to the thousands of undocumented children from families with NRPF who do not receive support under Section 17 of the Children’s Act 1989.
- Commit to extending eligibility to Free School Meals to all children living in poverty and food insecurity, regardless of immigration status, so that the current ‘temporary’ extension of eligibility is not rescinded when schools reopen.

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<sup>9</sup> Sustain and Project 17 (2020) Briefing paper: Free school meals & immigration policy [https://www.sustainweb.org/resources/files/reports/Free\\_school\\_meals\\_and\\_immigration\\_policy.pdf](https://www.sustainweb.org/resources/files/reports/Free_school_meals_and_immigration_policy.pdf) and Hackney Migrant Centre (2020) Children with No Recourse to Public Funds: The need for free school meals <https://hackneymigrantcentre.org.uk/wp-content/uploads/2020/04/Children-with-NRPF-The-need-for-FSM.pdf>

<sup>10</sup> Department for Education (2020) Coronavirus (COVID-19): temporary extension of free school meal eligibility to NRPF groups <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> Sustain et al (2020) Re: Temporary extension of free school meals eligibility to NRPF groups

<sup>12</sup> <https://gov.wales/free-school-meals-coronavirus-guidance-schools>

- In light of extended hardship encountered by millions of families during the crisis, the Government must ensure Universal Infant Free School Meals are immediately reinstated and properly funded as soon as schools reopen.
- In order to reinvigorate the public sector catering industry economy, and in order to provide for much higher proportion of children likely to be in need of a free school meal during 2020-21, we advocate extension of free school meals to all primary age children, as well as for all secondary school students from households in receipt of Universal Credit.

### **The Edenred national school voucher scheme**

On 31 March, Department for Education launched its National School Voucher Scheme in partnership with Edenred. The voucher scheme for England was only intended as a last resort option where existing catering arrangements were not viable, however the high-profile promise of £15 per week per child raised expectations amongst many parents. The announcement further confused existing arrangements between schools, local authorities and their caterers, as these vouchers were **centrally funded** and, at £15 per child per week, had a higher value than the free school meal allowance of £11.50 per week. This provided an incentive for schools to end catering arrangements (yet still hold onto core FSM funding) and transition families to the voucher scheme instead. Furthermore, many local authorities and school clusters had already launched their own voucher schemes or alternative payment schemes. Examples can be found in London Borough of Enfield, in South Lanarkshire in Scotland<sup>13</sup> and in Manchester City Council, which adopted Paypoint to provide cash to parents, whilst the London Borough of Wandsworth set all its schools up on Wonde, a voucher scheme giving families access to four supermarkets. Cardiff used the ParentPay system, already used by parents to pay for school meals, school trips, breakfast and after school clubs, in reverse, placing funds directly back into parents' accounts, and providing parents without bank accounts other alternatives, such as vouchers or food hampers. Caterers, councils, academy trusts and schools have worked incredibly hard to meet parents' needs with these localised solutions. However, schools and their partners doing this are financially disadvantaged, and placed at higher risk in that they have to make a separate, additional application to have their own voucher or payment schemes refunded by the Department for Education, and are required to demonstrate that they cannot meet these 'exceptional costs' without affecting their reserve levels or undermining their long term financial stability.

Despite a 12-week contract worth up to £234 million, based on a potential 1.3 million eligible children<sup>14</sup>, Edenred's systems were not equipped to deal with the scale of demand. It is not clear why the Department for Education opted for a single provider, rather than build on existing school providers, or make the payment available for other alternative pre-pay cash card systems such as AllPay, which works with any cashless system accepting credit

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[https://www.southlanarkshire.gov.uk/info/200228/health\\_and\\_medical\\_information/1863/coronavirus\\_covid-19\\_advice/21](https://www.southlanarkshire.gov.uk/info/200228/health_and_medical_information/1863/coronavirus_covid-19_advice/21)

<sup>14</sup> <https://schoolsweek.co.uk/edenreds-national-voucher-scheme-contract-worth-up-to-234m-new-documents-reveal/>

cards such as Visa or Mastercard, is used for Best Start in Scotland and has been selected for Healthy Start vouchers to be introduced in October 2020. Edenred's system was quickly overwhelmed with applications and was not able to quickly process the requests for vouchers. Schools who opted to take up the voucher scheme faced a huge administrative burden in order to register their families. Heads then had to register each of their free school meal families but first needed to check that the families could access email and would be able to redeem a digital voucher. In some cases, school staff had to visit families not responding to phone, email or text messages, or process the voucher codes on behalf of families, and print the e-gift cards.

The scheme was launched with just six retail partners that did not include Aldi, Lidl, Co-op or chains of independent/convenience stores where many lower-income families are likely to shop (as these are likely to be their most local shop - an especially important factor when people were staying at home during the lockdown). Aldi and McColl's joined the scheme in the final week of April 2020. Only two retailers offered online redemption of vouchers, but online shopping portals require a minimum spend, and delivery slots were largely unavailable to anyone registering new accounts. The Coop secured agreement with the Government to refund any schools using its own direct e-gift card option instead of Edenred.

Families were faced with long waits to access the e-code page. Parents resorted to trying the site in the middle of the night to avoid the queue, as well as families using up phone credit as a direct result of their efforts. Those without internet or printing facilities at home are still at a disadvantage with school staff having to redeem vouchers on their behalf and print for parents to collect. Local reports stated that these limitations and delays led to many families going without support.

Finally, several reports of parents successful in converting e-codes to vouchers were then faced with the humiliation of having the vouchers rejected at some supermarket tills. The Food Foundation research showed that around 12% of those who had received gift codes had not been able to redeem their vouchers, either due to lack of access to the retailers involved in the scheme, or a rejection of codes or vouchers during processing or at the till.

All of the above factors made it incredibly complex, expensive and time consuming for schools to administer vouchers, for parents to redeem them, and created additional unnecessary journeys to other shops than those nearest to their homes, adding to overall risk to public health.

Finally, it was only after lobbying that the voucher scheme was extended at the last minute to include the Easter holidays, and for May half-term it was revealed half-way through the week that there was no mechanism to prevent schools having applied to Edenred for vouchers to cover this period, forcing a policy u-turn (see next section). Schools and caterers continuing to manage their own delivery of meals and food parcels which they extended over the school holidays were not offered additional funding for this service, unless they applied for additional funding through the government's 'exceptional costs' arrangements.

**Recommendations:**

- The Government must end the incentive to adopt the national voucher system by clearly establishing the same level of support and funding for schools and local authorities implementing their own local free school meal solutions (whether catered, alternative voucher or cash-based payments).
- The Government must establish a review of the lessons learned from the introduction of a national school voucher programme limited to a single supplier, and whether there are better, more effective alternative mechanisms (such as prepayment cards, Paypoint or cash transfers) that would better complement the work of school caterers in serving the needs of vulnerable children more immediately and efficiently.

**Holiday provision**

Initially, the Department for Education announced that the national school voucher scheme would cover term-time only, the Government recognised at Easter that schools were facing “unprecedented levels of disruption and uncertainty” and at the last minute extended the scheme to include the Easter Holidays.

The precedent set by the Government therefore recognised that the levels of food insecurity being experienced by children during this emergency did not vary according to whether it was term time or school holidays. Similarly, the decision to extend other forms of support, such as the Job Retention Scheme, to October 2020, the lack of child food support during summer holidays would feel discriminatory.

On Wednesday 6 May 2020, 23 organisations wrote to the Department for Education calling on them to repeat the extension of holiday food provision for May half term and Easter, and the number of organisations backing this call later rose to more than 50 national and local organisations<sup>15</sup>. This call was amplified by 1,000 local councillors in mid-May<sup>16</sup>, whilst the National Association of Head Teachers confirmed directly to the Committee in its oral evidence hearing on 12 April that they wanted to support extended through school holidays. A petition launched by 16 year old Christina Adane from Lambeth calling for funding to cover all holidays for the rest of the academic year has had over 240,000 signatures by mid-June, indicating a groundswell of public support<sup>17</sup>. On 6 June 2020, Sustain’s Right to Food Campaign and the Good Law Project announced their intention to pursue a legal challenge about the failure to extend further food provision<sup>18</sup>.

Despite this, the Department for Education failed to confirm extension of holiday provision to cover May half term, in advance of the week itself. On 22 May, the Department wrote to the Education Select Committee admitting that, as it was unable to prevent schools from applying for Edenred vouchers for the half term week, they would fund meal provision for

<sup>15</sup> [https://www.sustainweb.org/news/may20\\_holidayfood/](https://www.sustainweb.org/news/may20_holidayfood/)

<sup>16</sup> <https://www.theguardian.com/education/2020/may/15/call-for-free-school-meals-during-half-term-summer-england>

<sup>17</sup> <https://www.change.org/p/boris-johnson-don-t-take-away-lunches-for-1-3-million-kids-on-free-school-meals>

<sup>18</sup> to be inserted

half term. Despite this, a written answer given on Tuesday 26 May to a Parliamentary Question from Baroness Rosie Boycott still did not confirm this extension of provision, but only mentioned Easter. No formal communication was sent to local authorities, head teacher associations or schools, and no announcement was made in the daily news briefing. It was only when Nick Gibbs appeared at the Education Select Committee inquiry on Wednesday 27 May that this change of policy was made public, whilst formal DfE guidance was only amended on 28 May. By this time, it was already too late for many schools and families, whilst in other areas local charities, food aid organisations and schools had stepped into the gap, using their own resources or via local fundraising efforts. On 4 June, the Prime Minister's spokesperson confirmed that the National Voucher Scheme would not be extended to summer<sup>19</sup>, but there has been nothing announced to fill the gap it will leave. This was confirmed in a letter to the Children's Food Campaign and other organisations from Education Minister Vicky Ford MP dated 9 June 2020<sup>20</sup>.

Unless the Department for Education confirms a comprehensive package to cover the summer holidays, its provision currently remains limited to just £9 million for the third year of pilot Holiday Activity and Food (HAF) programmes for selected communities. We understand that more than 60 programme applications were submitted, of which 10 have been selected for funding. Where these programmes are operating, they do not provide full coverage for all children eligible for Free School Meals, typically operating for 4 days per week for 4 weeks of the summer holiday, for only a proportion of children – for example one London based programme aims to reach 7,000 out of the 17,000 pupils eligible for free school meals across two boroughs. This means that even in the areas funded by the HAF programme, there will be eligible children receiving no additional support. The HAF programme is not an adequate response to the level of need that the Food Foundation and others are now evidencing, many families having used up available savings, or going into debt to survive this crisis<sup>21</sup>. The Department has not published the details of the successful HAF grant applications, but based on a similar level of funding to 2019, when the programme reached 50,000 children<sup>22</sup>, this is equivalent to just 3.8% of the 1.3 million children in England eligible for free school meals. There is therefore no current provision for an estimated 96% of all eligible children.

The Welsh Government has already announced £33m funding for schools to maintain food programmes over holiday periods up until the end of August, but a similar commitment for England has not been made by the Department for Education. This provides £19.50 per child per week to cover breakfast and lunch, with decision making on how it is to be distributed devolved to local authorities. A similar level of financial commitment to funding schools for all 1.3 million children eligible for free school meals in England at the start of the year, would

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<sup>19</sup> <https://www.mirror.co.uk/news/politics/government-confirms-free-school-meals-22138179>

<sup>20</sup> [https://www.sustainweb.org/resources/files/responses/CFC\\_DfEresponse\\_VickyFordMP\\_June20.pdf](https://www.sustainweb.org/resources/files/responses/CFC_DfEresponse_VickyFordMP_June20.pdf)

<sup>21</sup> [https://foodfoundation.org.uk/vulnerable\\_groups/new-food-foundation-data-food-insecurity-and-debt-are-the-new-reality-under-lockdown/](https://foodfoundation.org.uk/vulnerable_groups/new-food-foundation-data-food-insecurity-and-debt-are-the-new-reality-under-lockdown/)

<sup>22</sup> <https://www.gov.uk/government/news/free-meals-and-activities-for-50000-children-over-2019-summer-holidays>

require £117m to match the previous voucher scheme, or £152.1m to match the provision made to children in Wales. Recognising however, the need to extend this to families newly experiencing food insecurity, and the commitment to extending support to children with no recourse to public funds, we would argue a commitment of £180 million is likely to be needed.

**Recommendations:**

- The Government should immediately announce funding to extend provision of free school meals to forthcoming school holidays.
- A funding mechanism (similar to that established in Wales), by which each state-funded school will be allocated (either directly or via academy trusts or local authorities) with a premium based on eligible pupil numbers (adjusted to include NRPF and new UC claimants). Schools may then use this to disburse whatever combination of holiday activities, catered meals, food hamper deliveries, vouchers or cash payment alternatives, according to their own assessed needs of eligible children and their families, and report on its use in a similar manner to pupil premium.
- The Government should ensure all schools that incurred additional exceptional costs during May half-term in order to continue to provide food or financial support to families in need are able to apply for reimbursement of these costs.
- Eligibility for holiday food provision must include all children with no recourse to public funds, and children from families newly applying for Universal Credit as a result of continued employment and other income insecurity during this crisis.

June 2020