

Welsh Language Impact Assessment

Template

August 2014

Welsh Language Impact Assessment

Title: Revised eligibility criteria for free school meals in Wales due to the rollout of Universal Credit	WLIA Reference No <i>(completed by WLU):</i>				
Name of person completing form:	Martin Davies				
Date:	20 April 2018				
Policy lead:	Lowri Reed				
Contact details:	Martin.Davies@gov.Wales				
Programme/Project Type					
<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Project or programme				
<input checked="" type="checkbox"/> Legislation	<input type="checkbox"/> Research, evaluation				
<input type="checkbox"/> Grant	<input type="checkbox"/> Services				
<input type="checkbox"/> Business change	<input type="checkbox"/> Contracts, tenders				
<input type="checkbox"/> Infrastructure					
<input type="checkbox"/> Construction, Capital					
<input type="checkbox"/> ICT					
<input type="checkbox"/> Other (Please specify below)					
Costs: How much is the projected whole life cost for the programme/project?					
If below £25k, then a full WLIA is not always required (see guidance).					
Under £25k	£25k - £49k	£50 - £249K	£250K - £1m	Over £1m	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
				For the additional meal costs associated with an annualised net earnings threshold of £7,400 and the proposed transitional protection offer.	
Of the above, please provide details if there are any identified costs directly associated with the Welsh language?					
None, aside from staff costs involved in translating consultation documents, the draft equality impact assessment, the draft Regulatory Impact Assessment summary, and associated communications on this matter.					
How long is the programme/project expected to run?					
Up to 1 yr	Up to 2yrs	Up to 5yrs	Up to 10yrs	More than 10 yrs	Unknown

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
For this phase (i.e. until legislation is introduced)			To the end of the roll out of Universal Credit (currently expected to be in 2022), with transitional protection applying to some children beyond this (i.e. until the end of their school phase).		

Key milestone dates for the programme/ project:

6 June – 14 September 2018, public consultation on proposals regarding the introduction of new eligibility criteria for Free School Meals (FSM) due to the rollout of Universal Credit. This WLIA has been prepared in advance of the consultation.

The Welsh Government proposes to apply an earned income threshold for families who receive Universal Credit for the purpose of assessing entitlement to free school meals. We propose to introduce an annualised net earned income threshold of £7,400 from 1 January 2019. Transitional protection, which would ensure that no child would lose entitlement to free school meals during the rollout of Universal Credit (and beyond for some children), would also be provided from this date. The earned income threshold will be kept under review. Any subsequent change would require a separate impact assessment to be carried out.

STAGE 1: PLANNING

What are the aims and objectives of the policy?

What are the desired outcomes/ what constitutes 'success'?

Policy Aims and Objectives

The policy objectives are to revise eligibility criteria for free school meals ensuring:

- that those most in need are able to access free school meals, with the aim of improving health and educational outcomes
- the affordability of free school meal provision for local authorities, which would need to be funded by the Welsh Government, and,
- the affordability of any other related financial burdens for the Welsh Government which might arise.

Background

Eligibility for free school meals is currently based on receipt of one of range of benefits (e.g. income-based Jobseeker's Allowance) known as "passport benefits". These are being replaced by Universal Credit, which is gradually being rolled out across Wales.

The Free School Lunches and Milk (Universal Credit) (Wales) Order 2013 came into force on 6 September 2013. This temporarily extended the eligibility criteria for free school lunches and milk to include all families in receipt of Universal Credit, to ensure that families who might previously have been able to claim free school meals under the legacy benefits system did not lose out during the rollout of Universal Credit.

To date, the number of families receiving Universal Credit in Wales is relatively low. The rollout in respect of new claimants is due to complete in Wales in December 2018. Families already in receipt of the benefits that it replaces, and who have a change in their circumstances, are already being migrated on to Universal Credit. However, all remaining existing legacy benefit claimants are due to be migrated onto Universal Credit between 2019 and 2022.

Universal Credit will replace a number of "in work" benefits (e.g. Working Tax Credit), receipt of which would not currently result in eligibility for free school meals. Therefore, because all families with children in receipt of Universal Credit are currently entitled to free school meals, this has the potential to significantly increase the size of the free school meals cohort by the time Universal Credit is rolled out. This is not currently an issue as the rollout of Universal Credit to families in Wales is quite limited. However, this will change as the rollout progresses. By the time Universal Credit is fully rolled out, we estimate around half of all pupils would be eligible for free school meals (compared to 16 per cent in January 2017), which would be unaffordable.

No additional funding has been provided to the Welsh Government to manage the impact of the UK Government's Welfare Reform agenda (including Universal Credit) on free school meals .

Desired outcomes/ what constitutes 'success'?

Free school meals will remain available to those most in need. This is to be achieved within available resources.

What policy options have been considered?

and

What impacts will there be if the policy is *not* implemented?

What policy options have been considered?

We have considered:

- a number of different earned income thresholds. We propose to introduce an annualised net earnings threshold of £7,400, which overall is estimated to increase the number of children benefitting from free school meals in Wales by around 3,000 by the time Universal Credit is fully rolled out. This represents the estimated net change in the cohort size due to the new eligibility criteria proposed. It is relative to the estimated number of children that would have

received free school meals under the benefit system that Universal Credit is replacing.

- whether or not to offer transitional protection, whereby families are temporarily shielded from the effects of a policy change.

What impacts will there be if the policy is not implemented?

If no earnings threshold is put in place by the time Universal Credit is fully rolled out, the free school meals caseload in Wales is estimated to treble. This would mean that around half of all pupils would be eligible for free school meals (compared to 16 per cent in January 2017), which would be unaffordable.

As stated above, no additional funding has been provided to the Welsh Government to manage the impact of the UK Government’s Welfare Reform agenda on free school meals. If an earned income threshold is not put in place difficult funding decisions would have to be made.

As well as the additional financial burden of funding extra free school meals, any change in the profile of children eligible for free school meals would affect deprivation indicators used in grant funding streams, such as the Welsh Government’s Pupil Development Grant (PDG), the Education Improvement Grant for schools (EIG) and the Local Government Settlement funding formula.

Does the programme demonstrate a clear link with the Welsh Government’s strategy for the Welsh language – [Cymraeg 2050 A million Welsh speakers](#)

Free school meal provision is intended to benefit children living in families on low incomes, wherever in Wales they live. However, *Cymraeg 2050 A Million Welsh Speakers* does identify that many communities with a high density of Welsh speakers “contain pockets of deprivation and rural poverty, with average salaries among the lowest in the United Kingdom”.

What are the impacts/ effects (both positive and/or adverse) on the Welsh language you have identified at the initial planning stage

i.e. Welsh speakers, Welsh language communities, Welsh medium education, Welsh learners, services available in Welsh?

No adverse impacts have been identified.

Free school meal provision is intended to impact positively on children living in low income families, wherever in Wales they live and irrespective of whether they are Welsh speakers or in Welsh or English medium education.

Who are the stakeholders? Are the needs of Welsh speakers and learners addressed? To what extent are Welsh language interest groups likely to respond positively to the proposals?

Stakeholders:

- local authorities
- regional education consortia
- schools
- third sector organisations, in particular those that act for children and young people
- families

The Welsh language is not directly affected by changes to eligibility for free school meals.
 Welsh language interest groups are therefore unlikely to take an interest in the proposals.

Where an assessment was not completed, or no impacts were identified, please provide a full account for record keeping purposes?

No impact is anticipated on the Welsh language as a result of amending free school meals eligibility criteria. A full assessment is therefore not relevant, reasonable or practicable.

What actions/ further work has been identified at the initial planning stage?

e.g. data requirements, need for peer review, external engagement with Welsh speaking groups, identify stakeholders or consultation list, need to contact Welsh Language Division for advice)?

No actions/further work with respect to the Welsh language has been identified at this stage.

STAGE 2: IDENTIFYING AND ASSESSING IMPACTS

Impact Assessment Summary

Summarise the detailed impact assessment carried out together with the scores assigned.

Positive effects/ impacts:

N/A

Adverse effects/ impacts:

N/A

Opportunities to promote the Welsh language e.g. status, use of Welsh language services, use of Welsh in everyday life, Welsh at work increased?

N/A

Evidence/ data used including demographic profile when considering the effects/ impacts:


N/A

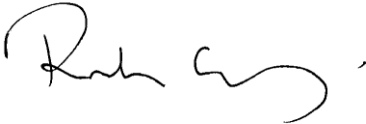
What is the overall anticipated likely impact on the Welsh language if this policy is taken forward based on the impact assessment/ risk assessment?

Positive:
 Adverse:
 Neutral:
 Unknown:

Decision following IA	1. No major change <input type="checkbox"/>
	2. Adjust the policy to improve impacts <input type="checkbox"/>
	3. Continue the policy with mitigation measures <input type="checkbox"/>
	4. Stop and remove the policy <input type="checkbox"/>
<p><i>If answered 2,3, or 4 above – then answer the following:</i> How will you address these impacts in order to improve the outcomes for the Welsh language? Details of mitigation measures/ action points/ alternative options to reduce adverse impacts and increase positive outcomes:</p>	
<p>If engaging or consulting, what are your plans? What questions do you wish to ask stakeholders about the Welsh Language Impact Assessment and Welsh language related issues?</p>	
STAGE 3: POST CONSULTATION AND PREPARING FOR PUBLICATION, MONITORING AND EVALUATION	
<p>Following consultation, what changes have you made to address any Welsh language issues that were raised?</p>	
<p>How will you monitor the ongoing effects during the implementation of the policy?</p>	
<p>Please outline how you will continue to capture effects/ impacts in future monitoring and evaluation?</p>	
<p>Any other comments – ongoing results of evaluations, emerging impacts</p>	

4. Declaration

Policy lead: <i>*Please delete as appropriate:</i> The policy *does/ does not have an impact upon the Welsh language. Where there were identified adverse impacts or missed opportunities, the appropriate amendments and actions have been put in place.
Name:
Lowri Reed
Department:
The Education Directorate Education and Public Services
Date (s):
23.5.18.
Signature:

Planned Review Dates: Post consultation and at regular intervals thereafter.

SRO ENDORSEMENT and REVIEW	
I am satisfied that the WLIA is an accurate reflection of the programme/project at this stage of development. By signing, I am able to confirm that the Welsh Language Standards have been given the appropriate attention. I will re-assess the programme/project at key stages throughout the life of the programme/ project, including policy reviews.	
 Signed (Senior Responsible Owner)	Date 23.5.18.

Signed (Senior Responsible Owner)	Review Date
Signed (Senior Responsible Owner)	Review Date
Signed (Senior Responsible Owner)	Review Date