1 Background

1.1 Inclusion Scotland is a network of disabled peoples’ organisations and individual disabled people. Our main aim is to draw attention to the physical, social, economic, cultural and attitudinal barriers that affect disabled people’s everyday lives and to encourage a wider understanding of those issues throughout Scotland.

2 General Comments

2.1 In general Inclusion Scotland welcomes the Child Poverty Bill and its associated targets. We believe that child, and adult, poverty must be tackled especially as disabled children and the children of disabled parents are disproportionately likely to experience poverty. We would like to see poverty tackled in a holistic way as child poverty does not exist in isolation from adult poverty. The Child Poverty Bill should thus be part of a wider anti-poverty strategy.

3 Child Poverty Targets

3.1 Inclusion Scotland welcomes the adoption of firm, income-related, measures of poverty as these allow both measurement of progress and comparisons with other countries' performance in tackling the same problem. However, we do have some concerns that the targets proposed may underestimate the extent and depth of poverty experienced by disabled children and the children of disabled parents.

3.2 The four targets to be adopted are income based measures of poverty (i.e. relative and absolute poverty, combined low income and material deprivation, and persistent poverty). The problem being that simply measuring household income tends to underestimate the extent and depth of poverty in households containing disabled people. That is because whilst the additional disability benefits payable to such households are counted as part of their household income no account is taken of the extra costs arising from disability that such households also incur.

3.3 Even using the current official measures of poverty both disabled children and children living in households containing a disabled adult are at higher risk of poverty. In 2014/15 twenty-three percent (23%) of households with a disabled adult were in poverty After Housing Costs (AFC), compared with 16% those without. Poverty rates were higher still for households with a disabled child: in 2014/15, twenty-seven percent (27%) of households with a disabled child were in poverty AHC, compared with 18% of those without.

4 Additional costs of disability:

4.1 In 2014 research by the disability charity Scope estimated that on average disabled people spend £550 a month on disability-related expenditure. In contrast disability benefits aimed at relieving those costs – Disability Living Allowance (DLA), Personal Independence Payment (PIP) and Attendance Allowance (AA) – fell far short of meeting them. In 2015/16, the average award of DLA or PIP was around £360 a month.

4.2 The 4 proposed targets all, in one way or another, take account of the additional income from disability benefits but fail to measure the impact of additional costs. This has the effect of boosting household income and lifting many households containing disabled people out of “poverty” when the current official measure of poverty is applied (i.e. 60% of median equivalised income). Whereas in fact those same households are consistently shown to be at twice the risk of material deprivation compared to households where there are no disabled children or adults.

5 Extent of disability related poverty:

5.1 The New Policy Institute carried out research last year where they discounted household income gained from entitlement to the main disability benefits – DLA, PIP and AA – in estimating poverty. They estimated that, once disability benefits are discounted, then 28% of those living in poverty in the UK are disabled people (3.9 million, including 310,000 children) while a further 20% of people in poverty (2.7 million) live in a household with a disabled person. That is nearly half (48%) of all the poverty in the UK is directly associated with disability.

Recommendation: Given that the current income measures of poverty tend to dramatically understate the extent and depth of poverty amongst disabled people, and particularly families with disabled children, Inclusion Scotland are calling for entitlement to the main disability benefits (DLA, PIP and AA) to be discounted when measuring the household incomes of families containing disabled children or adults.

6 Interim Targets:

6.1 Inclusion Scotland would support the adoption of interim targets. We believe that these are needed to focus attention on the long term goals by maintaining the momentum for change. Interim targets would also be a good way of measuring progress and ensuring that policy measures being taken to reduce poverty in the longer-term are having a positive impact on children in the here and now. We believe that the interim targets should centre around the delivery plan years with annual reports showing progress towards these targets.

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2 Brawn, E: Priced Out, Scope, April 2014
7 Reporting Mechanisms

7.1 Whilst Inclusion Scotland are in general in agreement with the need for Scottish Ministers to draw up periodic delivery plans we would like to see the Bill stating explicitly that the Government should, as well as consulting with organisations representing children and adults, also consult with organisations representing those disproportionately affected by poverty (which would include disabled people’s organisations).

7.2 Unless this is done disabled people, who have the greatest insight into their own poverty, will have little or no say in the policies that are developed to tackle their poverty and the poverty affecting families with disabled children. Moreover they would have no way of holding Scottish Government to account for failing to adopt policies advocated by disabled people’s organisations as the Scottish Government would be able to claim that they had consulted all the relevant stakeholders.

7.3 Ministers will be required to lay delivery plans and progress reports before Parliament but Inclusion Scotland would like to see additional sub-sections added requiring Parliamentary approval for delivery plans and scrutiny of progress reports.

8 Local Progress Reports:

8.1 Whilst Inclusion Scotland supports the principle of local action by Local Authorities and Health Boards to tackle child poverty we are not sure that simply requiring both to publish local progress reports will achieve this aim. For example, at present such bodies are required to publish Equality Outcomes but EHRC research suggests that many treat this as a paper exercise of listing existing policies rather than as a prompt to initiate new activities aimed at reducing discrimination and inequality.

8.2 In line with the principles contained in the Christie Commission’s report, Inclusion Scotland would instead like to see those in receipt of Local Authority and NHS services involved in developing and planning local action to tackle child poverty.

8.3 Therefore, we believe a duty should be placed on Local Authorities and Health Boards to draw up local plans to tackle child poverty in consultation with local children’s, parents’ and other organisations representing those disproportionately affected by poverty (e.g. disabled people’s organisations) and to then monitor and report on the implementation of their local plans. Similarly, there should be duties to include the eradication of Child Poverty in Local Outcome Improvement Plans and Children’s Service Plans.

9 The Child Poverty Measurement Framework and its 37 indicators

9.1 The 37 indicators to be used should, in general, provide useful indications of whether poverty and deprivation are being tackled. However, there are a few which, though useful in monitoring progress in tackling poverty, will not, as they stand, provide evidence of whether known societal inequalities are being tackled.
9.2 For example, the indicator, “Percentage of school leavers from the most deprived areas who are in positive destinations” will give a measure of what proportion of leavers from the most deprived areas are achieving positive destinations. Yet the proportion achieving positive outcomes could improve without the huge disparity in positive outcomes between disabled and non-disabled school leavers being addressed.

9.3 At present, after one year, disabled school leavers are twice as likely to be NETE (Not in Employment, Training or Education) than non-disabled school leavers. However, this rises to three times as likely to be NETE by age 19 - suggesting that some of those disabled young people presumed to have achieved “positive” destinations do not maintain them. As stated previously the overall proportion of young people achieving positive destinations could improve over time without any improvement in the proportion of young disabled people achieving positive destinations. This would in turn increase inequality rather than reducing it.

9.4 A similar situation can and does result from only measuring the proportion of the general population in employment. This has increased year on year since 2010 for Scots non-disabled people of working age and currently stands at over 80% whilst during the same period it has fallen for disabled people to 42%.

9.5 Inclusion Scotland is worried that if the focus of child poverty indicators is solely on “poverty” and they subsequently fail to measure increases, or decreases, in inequality then the inequalities in Scottish society may actually intensify rather than being reduced e.g. whilst the proportion of children living in poverty in the general population might be reduced, poverty amongst families with disabled children could remain static. Thus inequality could rise even though overall poverty had fallen.

10 National Poverty and Inequality Commission.

10.1 Inclusion Scotland are somewhat worried that the Poverty and Inequality Commission are not mentioned on the face of the Bill. This suggests that they will not be established in statute but instead at the behest of Ministers. Unfortunately, this means that their status as an independent body, able to fearlessly hold the Government to account, could be somewhat compromised.

10.2 For example, if the Commission’s secretariat and resources are in the Government’s gift then it might be denied the resources needed to carry out its duties effectively. Alternately if its chair and members are appointed directly by Ministers it might be “packed” with Government supporters, rather than independent voices, or it might not meet except on a Minister’s say-so or could even be discharged from meeting again.

**Recommendation**: Inclusion Scotland would prefer that the Poverty and Inequality Commission was established in statute with a clear remit and independent status. It should be given the power to collect evidence and report independently on progress towards targets to reduce poverty and also, equally importantly, inequalities such as gender, age, disability, race and sexual orientation. The Commission should also scrutinise delivery plans and progress reports and advise Ministers.
11 Conclusion

The problem with the invisibility of disabled people’s poverty and exclusion is exemplified in the latest Scottish poverty statistics. The published figures do not contain any measure of poverty in households with disabled adults or children. In fact, the published statistics make no mention of disability as a contributory factor to poverty other than in relation to non-income based measures of poverty amongst older people. This is unfortunately somewhat indicative of the overall priority attached to tackling poverty caused by disability. If you do not even measure, and acknowledge, the scale of a problem how can you begin to tackle it?

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