1. Do you agree that statutory child poverty targets should be re-introduced for Scotland?

**Answer:** Yes, children and young people in Scotland are disproportionately affected by deprivation. Reducing child poverty is a complex issue which requires a whole systems approach. Statutory child poverty targets will focus the actions of key partners and encourage cohesive, coordinated efforts to improve outcomes. The proposed targets are in line with those set under the Child Poverty (2010) Act at UK level and are compatible with the United Nations Convention on the Rights of the Child (UNCRC).

2. Is the appropriateness and scope of the 4 proposed targets fit for purpose?

**Answer:** The four proposed targets:
- < 10% of children living in households in Relative Poverty
- < 5% of children living in households in absolute poverty
- < 5% of children living in households in combined low income and material deprivation
- < 5% of children living in households in persistent poverty

These targets, which will be measured after housing costs are appropriate and will provide robust indicators. Simply measuring variables such as worklessness and educational attainment, although important outcomes, they are not stand alone, hard end outcomes. In comparison; quantifying changes in the % of children living in relative, absolute, combined low income, material deprivation and persistent poverty gives a clear focus to the development of national and local strategies. The re-introduction of income-based targets also reinforces the fact that the underlying causes of poverty are structural and not simply individual lifestyle issues. Additional analysis periodically to ensure the inclusion of particularly vulnerable populations e.g. looked after children, young carers, rural poverty would be prudent.

Nevertheless, other measures could be included to measure income differences between populations:

We could utilise the Gini Coefficient or Slope of Inequality analysis which would examine the inequalities experienced within individual areas. This would focus more widely on the differences in income distribution. These techniques simply identify where there are wide differences in income between populations living in close proximity. Where the gap is widest, there are greater inequalities. If Scotland wants to achieve a fairer society for all we need to investigate how to narrow the income gaps between populations, in particular those living in the same areas.

The IDACI (Income Domain Affecting Children’s Index) is a method of identifying 0 to 15 year olds living in deprived households. This measure can be more sensitive than child
poverty and can be broken down into quintiles therefore giving you a very robust view of those children who are close to the poverty line but, not registering (welfare reforms make this essential to try to mitigate the impact on families affected).

3. Are interim targets needed?

**Answer:** Yes: the final targets associated with the Child Poverty Bill are focused on the financial year 2030/31. If there are no interim targets we could lose the momentum of change by not reporting in achievable stages. Interim targets could easily be incorporated to fit with the Delivery Plans: April 2021 and April 2026.

4. Comment on - The proposed arrangements for reporting progress towards meeting the targets and how best to hold the Scottish Government to account.

**Answer:** The proposed arrangement to provide an annual report will provide local and national scrutiny. However, the lack of interim targets could make this process no more than an annual ‘paper exercise’. It will be important for supporting guidance to facilitate outcomes-focused reporting.

5. Comment on - The responsibility placed on local councils and health boards to make local progress reports.

**Answer:** Reducing child poverty is complex therefore, local progress reports are essential. Child poverty in Ayrshire and Arran in particular impacts significantly on health and social outcomes across the life course. In 2016, a study identifying the proportion of children living in low income families found that across Scotland; North and East Ayrshire ranked 2nd and 3rd worst in Scotland respectively with South Ayrshire sitting in 8th position. It is imperative that NHS Boards and Local Authorities work together to coordinate efforts to develop strategies which reduce and measure changes in Child Poverty. Nevertheless, the lead roles accorded to local authorities and NHS Boards would suggest additional necessary resourcing may be required beyond managing the proposed reporting framework to coordinate partnership activity.


**Answer:** These indicators are robust and will give an overarching picture of the complex variables associated with child poverty.

Would there be scope here to develop a ‘decent housing’ measure, this would mean we are trying to develop a measurement of housing quality / value for money?

Could there be a more Asset Based approach to collecting data? The CPPs are using a Place Based approach which could possibly be utilised and collated at a National level?

We could measure access to good quality, affordable food: the numbers of supermarkets, markets, corner shops within the area and transport links?

Other social impacts on poverty could be utilised such as the numbers of betting shops and off licences within an area as a measure of quality of life. Within our more deprived areas
there are always a plethora of fast food takeaways, off licences and betting shops: could the Scottish Government take a stand to limit the planning applications granted for these types of establishments?

The development of ACEs (Adverse Childhood Experiences) indicators in Scotland (building on the established Welsh and English indicators) will be an essential part of any measures to start to understand the complexity of child poverty including the wider determinants other than income e.g. social isolation, domestic violence, sexual abuse.

There should also be more of a focus on indicators which measure child and maternal wellbeing during early years, examples include; percentage of mothers smoking, percentage drinking/using drugs, percentage who are breastfeeding, % of children reaching their developmental milestones by the 27 – 30 month assessment. All of these factors are likely to contribute to a child’s capacity to succeed in life and therefore are pertinent particularly with regards to tracking markers of intergenerational transmission of adversity. These indicators could be housed within the “Prospects” section.

7. Although not in this Bill, the Scottish Government has committed to establishing a national poverty and inequality commission. What should this commission’s status and powers be in relation to this Bill?

**Answer:** The National Poverty and Inequalities Commission should have a leadership and scrutiny responsibility to examine the outcome measures and associated variables to support future delivery plans. They could also have a role in supporting local areas to develop evidence base approaches, share good practice, encourage research and development. This could be achieved through local Advisory Panels, drawing on local and national experience and expertise to improve child poverty outcomes.

8. Any other issues you think are relevant to this Bill.

**Answer:** Are we continuing to concentrate on working in an ‘adult’ focused world? We must consult with children, young people and service users at national and local levels to ensure we achieve sustainable changes to child poverty.

The Scottish Government must ensure they fully utilise the newly formed Integrated Joint Boards and Community Planning Partnerships (including locality groups) to embed legislation and implement the associated delivery plan. It is important that child poverty plans and measures are aligned with Community Planning Partnership local outcome improvement plans and with broader strategies which are inextricably linked to child poverty, e.g., economic development, welfare reform, education reform, housing and community empowerment. This would recognise the multi-factorial nature of child poverty and the need for cross-sector action to address it.

We should be aspiring for better outcomes for children in persistent poverty and the absolute negative impact this has on young lives should not be tolerated in Scotland. Nevertheless, there are specific vulnerable groups which should be identified specifically as they will require additional support and resources e.g. Looked After and Accommodated Children and Young People, Teenage Parents, Young Carers, Migrants, Asylum Seekers, Travelling Populations, young people and children with long term conditions, learning disability, affected by alcohol during pregnancy: FASD or FAS, emotional and mental health issues.
Equally, children and young people who have parents or carers who have similar physical, emotional, mental or addiction problems will also require specific targeting. These vulnerable populations must be identified and supported which will make real differences to the individual futures of many vulnerable children and young people and help reduce the impacts of child poverty across Scotland.