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

1.1 Yes, it is important that Scottish Government include an ambition to eradicate child poverty in statute. It is important to replace the provisions of the Child Poverty Act that are being removed, and to improve and strengthen elements of this legislation in Scotland.

1.2 Poverty is, first and foremost, about household income. As such, it is important that income targets are retained in statute and remain the key indicators of poverty. Retaining the four existing income measures for consistency is supported, allowing for a rounded view of poverty trends, and consistency with previous measurement.

2. **The appropriateness and scope of the 4 proposed targets,**

2.1 It is recognised that targets are an important aspect of setting Scottish Government’s ambition and direction of travel. The identified targets are extremely ambitious, particularly considering the Institute for Fiscal Studies predictions that child poverty will rise significantly between now and 2020.

2.2 With this in mind, it is anticipated that a more ambitious programme of work will be required in order to meet Scottish Government’s ambitions. It is recognised that Scottish Government has now gained significant taxation and social security powers through the constitutional settlement and it should look to use these to support more redistributive national policies in order to meet its proposed targets. It is not considered that policy interventions identified within Fairer Scotland or as part of the Social Security consultation will be sufficient to achieve the ambitious targets set out. The delivery plan should outline the rationale on which the proposed targets and timescales are based on, in order to better understand how the proposed reduction relates to the elements within the Delivery Plan.

2.3 Renfrewshire Council supports the use of the After Housing Costs measure within the target. Renfrewshire’s Tackling Poverty Commission considered the after housing costs measure, on the basis that it gives a more accurate picture of families’ finances. At a local level in Renfrewshire, it is considered that after housing costs measures are now the most useful and this is therefore the preferred approach.

3. **Whether interim targets are needed,**

3.1 As above, and considering the IFS predictions, it is proposed that Scottish Government will need to consider a more ambitious programme of work in order to meet the proposed targets by 2030. It is considered that interim targets would be a useful way of monitoring the impact of specific policy interventions on poverty levels, and to monitor progress towards achieving the targets.

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

4.1 The proposed approach seems appropriate. Considering the longer-term nature of the 2030 targets, it would be useful to consider whether there are elements of the Delivery Plan which will
take longer than 5 years and how these can incorporated into the Delivery Plan in practice (particularly where new plans are delivered every 5 years).

4.2 The Scottish Government should also consider how the reporting on the delivery plan can be made accessible, meaningful and transparent to people living in poverty across Scotland.

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

5.1 Renfrewshire Council’s initial consultation response highlighted that much of the innovation around tackling poverty is led from local partners, and in particular local authorities. From a Renfrewshire perspective, Renfrewshire’s Tackling Poverty Commission set out a strategic and coordinated approach to tackling child poverty, and has a nationally recognised tackling poverty strategy and action plan. The Commission process, although not necessary for all local areas, played a critical role in raising the profile of tackling poverty and galvanising partnership working which is now delivering a high-quality, evidence based approach. It should be noted that there are a number of local authorities that have adopted similar processes, and where the process of developing strategic and coordinated responses has been the catalyst for local action. As such, a duty to retrospectively report on activity may be less likely to generate change for local areas where child poverty has not been prioritised.

5.2 It is not certain how effective a duty for local authorities and health boards reporting jointly would be. If the duty was focussed on strategic planning around child poverty this would make more sense, as it encourages major local partners to present a strategic and coordinated approach to tackling poverty. However, it is proposed that joint reporting on activities which have already taken place in two separate organisations would be logistically challenging, with potentially little practical use.

5.3 Consideration should also be given to health boards reporting in a number of local authority areas, and the interaction with Health and Social Care Partnerships. In the case of Renfrewshire’s corresponding NHS board, NHS Greater Glasgow and Clyde, the board would need to produce 8 joint reports with its co-terminus local authority areas.

5.4 While the Child Poverty Act placed a duty on English local authorities to report on its measures to tackle child poverty, it should be noted that this was not necessarily a driver for increased activity or innovation. Scottish Government should closely consult with local partners to produce guidance for reporting which can ensure that reporting and monitoring is meaningful and impactful, as well as ensuring that any reporting and monitoring is not disproportionate or prohibitive.

6. The existing Child Poverty Measurement Framework and its 37 indicators,

6.1 It is considered that the measurement framework is a useful and appropriate tool. The ‘Pockets’, ‘Prospects’ and ‘Places’ themes were used by Renfrewshire’s Tackling Poverty Commission, and as such are the structure of Renfrewshire’s Tackling Poverty Strategy. In addition to this, Renfrewshire has structured its Tackling Poverty Action Plan around these themes and the reporting and governance of our Action Plan is structured by these outcomes.

6.2 Renfrewshire Council has been developing a dashboard of measures around child poverty, using the current measurement framework as a base. The measurement framework as it exists is a useful tool, but is limited in its usefulness at local level due to difficulty in getting data at a more local level, and sometimes even at Local Authority level. There is room for refinement of the
current indicators within the framework, with a clearer alignment to policy interventions and relationship to wider evidence base around drivers and impacts of child poverty. For example, it would be useful to have more robust measures around the ‘Pockets’ outcome – in recognition of the focus on household income as the primary driver of poverty. Related to this, there are a number of indicators within the measurement framework which relate to individual health behaviours. While it is accepted that many of these behaviours are socially patterned and related to wider health inequalities, it is considered that these types of measures are given too much weight within the current framework. Where possible, it would be useful for indicators to focus around the ‘gap’ or particular disparity of outcome, for example, many of the ‘places’ indicators measure indicators within a deprived area – but the comparator to non-deprived areas or an average is necessary to establish whether movement within the indicator can be considered to be progress.

6.3 Support and resources for local level data is welcomed, as if the Child Poverty Delivery Plan is designed to be a ‘Team Scotland’ approach, then the measurement framework could be adapted to be more relevant for other stakeholders and local partners. In addition, Scottish Government should consider how Scottish Government itself might be able to use and interpret local data – which often gives a more responsive picture of the issues that people living in poverty face and might be more useful in developing national and local policy responses.

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?

7.1 There have a number of poverty and fairness commissions across Scotland at a local level, including Renfrewshire. It is recognised that while local Commissions have included Commissioners that add a local perspective, many of these Commissions have also included a number of the same national organisations or spokespeople.

7.2 It would be useful for a national poverty and inequality commission to consider how the recommendations of local poverty and fairness Commissions align, and the influence that these recommendations can have on national child poverty policy and practice, as well as how that learning can be shared at a local level. Commission reports from Renfrewshire, Fife and Dundee, while they vary to account for local context, are consistent in their analysis of poverty and its impacts across Scotland.

7.3 It should be considered how the commission remains closely connected to communities and local action, and in particular what role citizens living in poverty can play in influencing national policy. The commission could potentially have an important role in making sure that the Delivery Plan is developed in partnership with the full range of local and national partners, and reflects the voices of people living in poverty.

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