SOCIAL SECURITY COMMITTEE

AGENDA

8th Meeting, 2017 (Session 5)

Thursday 20 April 2017

The Committee will meet at 9.30 am in the David Livingstone Room (CR6).

1. **Decision on taking business in private:** The Committee will decide whether to take items 4, 5 and 6 in private.

2. **Child Poverty (Scotland) Bill:** The Committee will take evidence on the Bill at Stage 1 from—
   
   Peter Allan, Community Planning Manager, Dundee City Council;
   
   Professor Andrew Russell, Medical Director and Deputy Chief Executive, NHS Tayside;
   
   Robert McGregor, Policy Manager, Fife Council;
   
   Dr Margaret Hannah, Director of Public Health, NHS Fife;

   and then from—
   
   Bill Scott, Director of Policy, Inclusion Scotland;
   
   Emma Trottier, Policy Manager, Engender.

3. **Child Poverty (Scotland) Bill (in private):** The Committee will review the evidence heard earlier in the meeting.

4. **Budget process consultation:** The Committee will consider whether it wishes to respond to the Budget Process Review Group’s consultation.

5. **Annual report:** The Committee will consider its approach to its annual report.

6. **Committee expert support:** The Committee will consider nominations for expert support for its work.
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The Scottish Parliament
Edinburgh
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The papers for this meeting are as follows—

**Agenda Item 2**

Written Submissions SC/S5/17/8/1
SPICe Briefing SC/S5/17/8/2
SPICe Evidence Summary SC/S5/17/8/3

**Agenda Item 4**

PRIVATE PAPER SC/S5/17/8/4 (P)

**Agenda Item 5**

PRIVATE PAPER SC/S5/17/8/5 (P)

**Agenda Item 6**

PRIVATE PAPER SC/S5/17/8/6 (P)
Social Security Committee

8th Meeting, 2017 (Session 5), Thursday 20 April 2017

Child Poverty (Scotland) Bill

Introduction

1. The Committee will consider its second evidence session on the Child Poverty (Scotland) Bill at today’s meeting.

Written Submissions

2. A total of 40 submissions were received following the Committee’s call for written evidence. They can be viewed by following the link below:


3. Submissions from the witnesses giving evidence today are in Annexe A as follows:

   - Peter Allan, Dundee City Council
   - Robert McGregor, Fife Council and Dr Margaret Hannah, NHS Fife (joint submission)
   - Emma Trottier, Engender
   - Bill Scott, Inclusion Scotland
Annexe A

Written submission from Dundee City Council

1  Introduction

1.1 Dundee City Council is delighted to have been invited to participate in an evidence panel before the Scottish Parliament’s Social Security Committee on 20 April 2016. As background for the Committee, the following information reflects the action being taken in Dundee in response to anti-poverty in general, much of which relates directly to levels of child poverty in the city.

2. Dundee Fairness Strategy and Commission

2.1 Dundee City Council and the Dundee Partnership first adopted their Fairness Strategy in June 2012. This set out a range of outcomes together with a detailed action plan. To add greater momentum and scrutiny to anti-poverty efforts, the Dundee Fairness Commission was established in April 2015 and its 56 recommendations were subsequently endorsed by the Council in June 2016. The Chief Executive was instructed to produce an Action Plan within six months and this was agreed in November 2016.


2.2 In the interim, the Scottish Government published its new Fairer Scotland Action Plan. This was informed by various forms of public engagement including a public session with the then Cabinet Secretary for Social Justice held in the Council Chambers hosted by the Dundee Fairness Commission. The Fairer Scotland Action Plan proposed fifty actions, all of which complemented the recommendations of the Dundee Fairness Commission. Indeed, a specific pledge was included in the plan itself on behalf of the Dundee Partnership.

2.3 Faith in Community Dundee, along with Craigowl Communities and Shelter Dundee, led the community engagement in the original Fairness Commission and produced a powerful and fascinating insight into people’s experiences in the city.

http://www.dundeepartnership.co.uk/sites/default/files/FICD%20povertyreport.pdf

2.4 Strategic outcomes for tackling poverty and promoting fairness have been reflected in a variety of ways from the national Fairer Scotland Action Plan and Child Poverty Strategy through to the specific themes identified by the Dundee Fairness Commission.
3  Tackling Poverty in Dundee

3.1 Reducing inequalities is an explicit priority for the Dundee Partnership as a whole and is captured in the strategic and operational planning and ongoing work of all members including individual statutory partners and supporting bodies such as the Health and Social Care Partnership and the Alcohol and Drugs Partnership. It will feature prominently in the forthcoming Local Outcome Improvement Plan for Dundee that will set out the whole Dundee Partnership’s ambition for improving the quality of life in the city over the next decade.

3.2 This commitment also permeates throughout the Council’s corporate vision and plan and can be seen in social and regeneration dimensions of the recent Growth Accelerator Model funding application for the Dundee Waterfront and the evolving proposals for the Tay Cities Deal; investment in local facilities which co-locate services and provide community assets; targeted school-based initiatives to improve confidence and learning through the Attainment Challenge and the Aspire approach; and limiting rent rises for Council tenants to below wage inflation.

3.3 Indeed, since the Fairness Commission reported in May 2016, the Partnership and the Council has already made noticeable progress by increasing school uniform grants, securing living wage accreditation, reducing school exclusions and co-locating advice services in job centres and GP practices.

3.4 While many aspects of poverty can be seen across the city, these can have the biggest impact when they combine in particular localities as evidenced by the results of the Scottish Index of Multiple Deprivation. Given the existing commitment to the local employability pilots in the North East and East End wards, members of these Local Community Planning Partnerships will be invited to consider how agencies and communities themselves can contribute to a greater focus on dealing with the causes and consequences of poverty as part of a concerted, joined up approach to increasing fairness in their localities.

3.5 Dundee’s third sector was and continues to be a vital partner in the development and delivery of the action plan. Maximising the contributions and commitment of this sector will key as we move forward.

3.6 It is expected that further targeted and costed actions will be added in subsequent reports to committee. There will also be the opportunity for all partners, including those in the private sectors, to fully reflect their contributions to a city-wide programmed tackling these long-term and complex issues. The action plan contains, necessarily, a wealth of commitments and the following are examples where significant impacts are anticipated:-

Stigma and Social Inclusion

- Creating a Dundee body based on the Poverty Truth Commission
- Expanding the Stick Your Labels campaign
• Expanding Poverty Sensitivity Training for front-line staff

Work and Wages

• Expanding Scottish Living Wage commitment
• Securing community benefits through Central Waterfront developments
• Delivering integrated locality employability pilot

Benefit, Advice and Support

• Securing Big Lottery and ESF funding to test a new model of service delivery for Budget and Money Advice
• Opening new advice facility in Ninewells Hospital concourse
• Implementing a new Advice Strategy for Dundee

Closing the Education Gap

• Demonstrating progress through the Scottish Attainment Challenge
• Introducing the Big Noise/Sistema project
• Undertaking a Cost of the School Day project across 20 schools

Housing and Communities

• Increasing houses receiving Warm Home Discounts
• Increasing enforcement of standards in the private rented sector
• Piloting fuel vouchers in Dundee Food Banks

Improving Health

• Expanding social prescribing delivery
• Expanding provision of benefits advice in GP practices
• Increasing network of recovery cafes across city

4 A New Fairness Conversation in Dundee

4.1 The Dundee Partnership and Scottish Government are jointly funding a new project to follow on from the Fairness Commission. The group will involve an equal number of people who have personal experience working alongside senior civic, political and business leaders in Dundee. Over the next 18 months they will develop a shared understanding between the two groups of commissioners and make proposals around key areas of anti-poverty work identified through the experience and knowledge of the commissioners.

4.2 This signals the start of a new stage in the fairness conversation, one that will involve people from local communities influencing change through their experiences and ideas. According to one Community Commissioner: “People
who are struggling against poverty in our daily lives are the real experts. We want to share our stories and help to change things for the better.”

4.3 The process will, again, be facilitated by Faith in Community Dundee, in partnership with Dundee City Council and is funded by the Dundee Partnership and the Social Justice and Regeneration Division of the Scottish Government.

23 March 2016

Written submission from Fife Partnership (Fife Council and NHS Fife)

Introduction
Child Poverty legislation will ultimately have implications for the people who live in Fife and for community planning partners. We have therefore taken considerable care in reflecting the views of partners and have agreed that there are some key messages that we would want to elevate to sit on top of the responses to the specific questions that are asked by the Social Security Committee.

We have also highlighted some of the work streams that we have invested in or will invest in to illustrate the kind of contribution to tackling child poverty (and all poverty) that is made at a local level.

Key messages
Through discussions to arrive at a shared partnership response a number of key messages emerged. These were -

- The levers to address child poverty are distributed rather than sitting mostly with Scottish Government. Councils and their local partners already do a great deal to tackle child poverty. We want to ensure that this is recognised at a Scottish level.

- With that in mind, we believe that a significant role for Scottish Government should be to provide a framework for tackling child poverty and to work hardest on enabling and supporting local partners to be doing more and / or better. There needs to be a focus on learning from those with the most effective policy and practice and supporting those who are less active or less effective to strengthen their work.

- The Scottish Government wants to especially focus on child poverty within a wider approach to poverty and inequality. We think that even a perception of narrowing on focus could be detrimental to the wider tackling poverty and reducing inequalities outcomes that we are looking to achieve.

- We believe that there is a very good opportunity for us to use rich data and evidence – much of it held locally - to consider new approaches, reconsider targeting and how we can do much more work on early intervention to prevent child poverty and to break cycles. We think that legislation, or its accompanying guidance, should encourage this.
Programmes and projects at a Fife level

We list some programmes and project to illustrate the local contributions to the poverty agenda -

- Seven locally developed and delivered Welfare Reform and anti-poverty action plans, covering the geography of Fife – as part of a localised community planning response;
- support to children and families through their early years;
- a strong focus on raising attainment for children in the most disadvantaged areas;
- addressing the cost of school day;
- parent-led childcare pilots;
- support for lone parents in finding and sustaining employment;
- joint work with the DWP on strengthening communications with those vulnerable to receiving benefit sanctions;
- innovative employability work with children in schools;
- an aspiration to rapidly increase the number of apprenticeships in Fife;
- a holistic approach to delivering the Scottish Welfare Fund including a presence in some food banks on a pilot basis;
- promoting savings and affordable, responsible borrowing through development of the credit union movement and establishing a community development finance institution (CDFI).

Response to specific questions

Question 1

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

We would agree that there is merit in setting targets. It is vital that child poverty is recognised as a key challenge facing Scottish society, and important that this is reflected in an ambition to eradicate child poverty – encapsulated in a clear national policy, with appropriate legislative support.

We would agree with a position set out in the Scottish Government’s consultation for 2030 deadlines. A 2030 deadline seems sensible given the need to align with timescales set out by a Fairer Scotland approach. It also fits locally in Fife with the work of the Fairer Fife Commission.

These timescales reflect the ambition of the challenge and the significant amount of action and change in culture that needs to be achieved. The targets should reflect a range of non-income measures.

There is also a view stating that child poverty can be alleviated by a given date is a crude fixed target and may be difficult to achieve. With that in mind, it would be important to be explicit on interim targets reflecting milestones on contributory factors.
Question 2

The appropriateness and scope of the 4 proposed targets

We would like to see child poverty targets in use at national and local levels but as part of a suite of poverty and fairness measures.

There are potential issues about how poverty is defined. If measures used are about relative poverty, for example, then that cannot be eradicated. There is also a risk that a narrow focus on child poverty might miss some of the most vulnerable low income households (without child dependents).

It is important that any targets chosen are based on indicators that can be measured at local authority and sub-local authority level.

Consideration should be given to using the Joseph Rowntree Foundation’s (JRF) measures – see its report ‘We Can Solve Poverty in the UK’ (Sept 2016) - which are less arbitrary and less focused on a median UK income. The JRF measure is 75% of the minimum income standard (MIS). The MIS reflects the income required to enable households to meet the costs of basic needs such as food, fuel, transport, household bills, and cultural participation.

It is also important to recognise that although many of the factors and levers to impact on poverty are at UK or international level so income targets set for Scotland have to be caveated. It should be explicit that it is not only public agencies that have leverage on income and others should be drawn into the wider partnership discussion – initiatives such as the Living Wage campaign, drawing in business, are key to this.

Question 3

Whether interim targets are needed

Rather than overly focus on targets we feel that in the early years of a new or enhanced approach to tackling child poverty we concentrate more on ensuring commitment, areas of action and clear approaches to sharing learning across the country. Any ‘targets’ could instead take the form of milestones. For example, that child poverty actions are clearly embedded in community planning partnership plans.

Question 4

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

The intention to match the timing of Delivery Plans to the length of the Scottish Parliamentary term seems sensible.
However, we think that it would be better to have a requirement placed on Scottish Ministers to produce a Reducing Inequality and Poverty Delivery Plan that would include a child poverty priority. That would also square with the intention to establish a national poverty and inequality commission. The Delivery Plan should reflect the pivotal contribution of councils and their local partners.

There may be some benefit in reporting annually but only if the measures chosen to report can actually be shifted in that time frame.

**Question 5**

**The responsibility placed on local councils and health boards to make local progress reports**

We think that it is sensible to place a responsibility on local partnerships to make local progress reports. Given that local authorities are most often the lead agents this makes sense that any formal responsibility for ensuring that happens should be placed with them.

We would be most supportive of that joint reporting – as referenced in the Bill – rather than individual reports. But the Bill also implies that the ‘action report’ should detail the actions separately by local authority and Health Board. This seems inappropriate since many actions are taken in partnership and with other players involved.

We have two additional concerns. A report which only asks for a description of actions could be framed around a listing of what is done anyway rather than the Bill / Act prompting new, innovative work with more substantial, sustainable impacts. Secondly, the report asked for is entirely retrospective (on the previous year) – should there not be a need to identify emerging priorities? The Bill as it stands could simply be encouraging stand-still.

**Question 6**

**The existing Child Poverty Measurement Framework and its 37 indicators**

We think it is opportune to revisit the framework and consider what measures are needed.

We feel that the framework gives a lot of attention to deficits rather than assets. What are children able to do? What are their aspirations? How can we as the wider society in Scotland help them fulfil their ambitions regardless of income? What do children say about where they grow up? What would they do to enhance their environment?
Question 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?

It would be useful to have a cross-sectoral group monitoring progress on child poverty but in the context of a future life for children in Scotland which helps them fulfil their aspirations regardless of background.

Question 8

Any other issues you think are relevant to this Bill?

(1) Over recent years, Scotland has taken significant steps towards improving the way that public services support our children and young people, moving from traditional models of working (based on distinct, professional silos, which focused narrowly on particular aspects of a child’s needs) to a more holistic approach with the child at the centre. The adoption of the GIRFEC approach, and strong support for a partnership approach to children’s services has been central to achieving this change.

It is important that our national approach to eradicating child poverty supports this child-centred, partnership approach to the whole child. It will need to recognise the many ways that poverty affects the lives of children and young people, within the family, the household and the local community.

It is also important to recognise that too often the experience of poverty follows a repeated cycle, of which the child’s experience is only a part. Successfully tackling child poverty will require interventions throughout this cycle of poverty. As such it will be important for a national approach to eradicating child poverty to be located within a wider framework for tackling poverty.

(2) There is also a risk that a narrow focus on child poverty might miss some of the most vulnerable low income households. If poverty and inequality are more effectively tackled at national and community planning partnership level for all households in poverty and at risk of poverty, then that will act to lower child poverty. It is important that we see poverty from a children’s perspective but not to limit our approaches and investment decisions.

(3) Scottish Government should provide data on income and other economic and social measures at sub-local levels such as Office National Statistics is committing to doing in England and Wales (small area income and poverty estimates). This would allow local authorities and partners to target provision and consider behavioural approaches to tackling poverty.
Written submission from Engender

Engender welcomes the introduction of the Child Poverty (Scotland) Bill, which ambitiously sets targets to eradicate child poverty by 2030. The introduction of the proposed legislation signals a vital intent by the Scottish Government to build a fairer Scotland. Though we welcome the purpose of the Bill, we believe that gendering it on its face would strengthen the legislation, and provide stronger direction for the content of child poverty delivery plans and local child poverty action reports. The evidence supports our contention that understanding and tackling women’s poverty in Scotland will be central to the success of the Child Poverty (Scotland) Bill.

Women and Poverty

1. Women are more likely to be living in poverty than men, and there is a particularly high risk of poverty among black and minority ethnic women, disabled women, and refugee and asylum-seeking women.¹ In this section, we explore some of the reasons why women are more likely to be living in poverty than men.

2. On average, women in Scotland earn £182.90 per week less than men.² As explained in the literature, the gender pay gap can be explained by both occupational segregation and ‘the fact that jobs which are predominantly done by women tend to be lower paid’.³ Further, children and caring responsibilities ‘result in many women having an interrupted profile of labour market activity, and much higher rates of part-time work than men’.⁴ In Scotland, women account for 75 percent of the part-time workforce, and earn 33.5 percent less than men working in full-time employment.⁵

3. There is a lack of flexible, high-quality and affordable childcare in Scotland. Childcare costs in Scotland are amongst the highest in the UK, and the UK costs are among the highest in the world. Access to affordable childcare is a major barrier to women being able to work, study and access vocational training. Due to the high cost of children, 25 percent of parents living in absolute poverty in Scotland have given up work, a third have turned down employment due to inaccessible and unaffordable childcare, and a further 25 percent have not been able to take up education or training.⁶

4. Lone mothers are most likely to experience poverty, and tend to be more disadvantaged than parents in couple households. In 2015, 141,400 lone parents with dependent children were living in Scotland. Nine out of 10 lone parents (91 percent; 128,400) were women. Lone mothers have a lower rate of employment; are less likely to report they are managing very well/fairly well

³ Bradshaw, J, et al.
⁴ Bradshaw, J., et al.
financially; and less likely to report that they are in good/very good general health.\textsuperscript{7} As reported by the Scottish Government, poverty rates after housing costs for lone mothers fell in 2010-11, but have increased since, reaching 37 percent in 2014-15.\textsuperscript{8} Women make up 95 percent of lone parents receiving Income Support.

5. Further contributing to women’s poverty is the distribution of finances within households. Access to resources is a fundamental aspect of gender inequality. Income and other resources are often not controlled or shared equally within the household.\textsuperscript{9} Literature on poverty in Britain has captured this reality for women. One study explains that in households where men are ‘the sole breadwinners, their partners may not get equal access to earnings entering the household, which appears to be the case in some low-income families…In some low-income households, parents, but especially mothers, forego their own consumption to meet the demands of their children’.\textsuperscript{10}

6. Economic dependency is particularly acute in households where women experience domestic violence. ‘Mothers experiencing domestic violence are more likely to become lone parents, less likely to be earning independently, and more likely to report their families getting into financial difficulties, with family incomes sometimes withheld from the victim and child as part of a pattern of abuse. All of this…places their children at greater risk of suffering poverty’.\textsuperscript{11} Scottish Women’s Aid reports that on one day in 2013, 341 women and 257 children and young people were living in a Women’s Aid refuge.\textsuperscript{12}

7. Systemic barriers to economic resources are amplified for black and minority ethnic women, disabled women and refugee women. Many of these women experience racism, discrimination and stereotyping in the labour market.\textsuperscript{13} Refugee and asylum-seeking women trying to enter the labour market face barriers ranging from lack of information on available employment services, racism and discrimination, lack of affordable childcare, and caring responsibilities.\textsuperscript{14}

8. Women are twice as likely as men to be dependent on social security. Social security reforms – or ‘reforms’ – and the UK Government’s wider austerity agenda are having a disproportionate impact on women’s access to resources, as well as their safety, security and well-being. Over the decade of austerity

\textsuperscript{7} NHS Health Scotland. (2016). \textit{Lone parents in Scotland, Great Britain and the UK: health, employment and social security.}
\textsuperscript{8} Scottish Government. (2015). \textit{Poverty and Income Inequality in Scotland.}
\textsuperscript{9} Joseph Rowntree Foundation. (2014). \textit{Poverty through a gender lens: Evidence and policy review on gender and poverty.}
\textsuperscript{10} Bradshaw, J. et al.
\textsuperscript{11} Women’s Budget Group. (2005). \textit{Women’s and Child’s Poverty: Making the Links.}
\textsuperscript{12} Scottish Women’s Aid. (2013). \textit{Facts and Figures.}
\textsuperscript{13} Engender, Inclusion Scotland and SDEF disabled women’s discussion forums, 2013-2015.
\textsuperscript{14} Scottish Refugee Council. (2011). \textit{The Struggle to Contribute.}
(2010 to 2020), 86 percent of net ‘savings’ raised through cuts to social security and tax credits will come from women’s incomes.\textsuperscript{15}

**Women’s Poverty and its Implications for Child Poverty**

‘The well-being of children cannot be divorced from that of their mothers’.\textsuperscript{16}

9. In 2005, the Women’s Budget Group drafted a report titled ‘Women’s and Children’s Poverty: Making the Links’. The report was a response to the UK Government focus on child poverty, which the Women’s Budget Group viewed as lacking ‘a gendered dimension to poverty’.\textsuperscript{17} The organisation wrote that ‘without recognition and analysis of the links between women’s and children’s poverty, the [UK] Government will struggle to meet its target to eliminate child poverty’.\textsuperscript{18}

10. The Women’s Budget Group is an independent UK organisation, which brings together economists, researchers and policy experts from academia, non-governmental organisations and trade unions to form a network of experts to promote gender equality through appropriate economic and social policy.\textsuperscript{19} Engender strongly recommends that the Social Security Committee examine the report by the Women’s Budget Group, which has been included as part of our evidence to the Committee. While the report provides an in-depth analysis of the gendered dimensions of poverty, our evidence below provides a few key points made by the Women’s Budget Group.

11. Research shows that poverty increases ‘the risk of parenting difficulties and parenting breakdown’.\textsuperscript{20} Studies on the impacts of poverty on parents and parenting has shown that parents ‘don’t see themselves as having ‘problems with parenting’ as much as having problems with poverty’.\textsuperscript{21} For parents living in poor environments, the cause of their problems was poverty.

12. The literature on parents living in poverty demonstrates that mothers are trapped in a vicious circle. The ‘stress of managing poverty can have a damaging impact on mothers’ physical and mental health, which in turn adversely affects their morale and overall well-being’\textsuperscript{22} and leads to a ‘struggle to do their best by their children and to protect them from the worst effects of poverty’.\textsuperscript{23}

\textsuperscript{17} Women’s Budget Group. (2005).
\textsuperscript{18} Women’s Budget Group. (2005).
\textsuperscript{19} Women’s Budget Group. (2017). http://wbg.org.uk/\textsuperscript{17}
\textsuperscript{22} Women’s Budget Group. (2005).
\textsuperscript{23} Women’s Budget Group. (2005).
13. Living in poverty builds barriers to employment. Poor health and low morale impact the ability of mothers to find and maintain paid employment. As one researcher explains ‘many out-of-work lone parents experience a malign spiral of hardship, poor health and low morale. There is something about this experience that builds up its own barriers to work….It is quite hard to contemplate work if you are that demoralised and hard up.’

14. Some of the arguments put forward by the Women’s Budget Group focus on what actions can be taken to support mothers living in poverty. These included developing a gendered employment strategy; improving the provision of childcare ‘in terms of its affordability, accessibility and quality’; and focusing on improving and better funding social security programs for mothers and mothers-to-be.

**Child Poverty (Scotland) Bill**

15. Engender supports the four income based targets in the Bill, which are well-known and understood amongst stakeholders. Consideration, however, should be given to including interim targets in the Bill. The inclusion of interim targets would provide a measure by which to gauge the success of the Bill or to identify gaps in the plans and/or service delivery to meet the 2030 targets. We recommend, as have Child Poverty Action Group and End Child Poverty, that the Scottish Government include interim targets in the Bill.

16. The proposed legislation places a responsibility on each local authority to prepare and publish a report describing the measures they have taken. We are aware that the Committee has received submissions already highlighting that this requirement may be difficult for local authorities to achieve, given existing budget pressures and constraints. We wish to echo these concerns.

17. We believe that the success of the Bill will hinge on the delivery plans developed by the Scottish Government. Similarly to evidence given by other third sector organisations, our view is that the delivery plans should focus on policy areas targeting the risk factors associated with child poverty. Moreover, the plans developed by the Scottish Government must be gendered for reasons elaborated above. It is our firm view that failing to tackle gender inequality in poverty will jeopardize the Scottish Government’s ambition to eradicate child poverty in Scotland.

18. Over a decade ago, the Equal Opportunities Commission wrote ‘poverty in Britain is highly gendered’, and warned that policies which neglect to consider the realities of women living in poverty were destined to fail. Given reports and forecasts by the Joseph Rowntree Foundation on living standards in the UK, lessons must be learned from the consequences of failing to gender poverty strategies. It is our view that the proposed delivery plans by

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26 Bradshaw, J. et al.
the Scottish Government must be gendered to help achieve a fair and equal society in Scotland.

Written submission from Inclusion Scotland

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%)\(^{27}\) of households with a disabled adult were in poverty. After Housing Costs (AHC), 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.\(^{28}\) 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.\(^{29}\)

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.

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\(^{28}\) Brawn, E: *Priced Out*, Scope, April 2014

\(^{29}\) ‘Fulfilling Potential: Building a deeper understanding of disability in the UK today’, DWP, 2013
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.

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\(^{30}\). 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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Inclusion Scotland
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Tel: 0131 281 0861

21 March 2017

Social Security Committee
8th Meeting, 2017 (Session 5), Thursday 20 April 2017
Child Poverty (Scotland) Bill

1. Introduction
This paper provides background information to inform the Committee’s formal evidence-taking as part of its Stage 1 consideration of the Child Poverty (Scotland) Bill (“the Bill”). The Bill intends to introduce statutory income-based targets on child poverty in Scotland to replace the UK-wide targets that were previously set out in the Child Poverty Act 2010. Through provisions in the Welfare Reform and Work Act 2016, the Child Poverty Act was renamed the Life Chances Act 2010 and the statutory income-based targets were removed.


2. Provisions in the Bill
This section briefly describes the provisions in the Bill. More information on the scope of the Bill can be found in the SPICe Briefing: SB17/10 Child Poverty (Scotland) Bill. The Bill makes provision for four income-based targets on child poverty, to be achieved in the financial year commencing 1 April 2030. The targets are:

- Less than 10 per cent of children living in households in relative poverty (below 60 per cent of equivalised median net household income).
- Less than five per cent of children living in households in absolute poverty (below 60 per cent of equivalised median net household income in the “reference year”)\(^1\).
- Less than five per cent of children living in households in combined low income and material deprivation\(^2\).
- Less than five per cent of children living in households in persistent poverty (in relative poverty as above for three of the past four years).

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\(^1\) The reference year is currently 2010-11, but is expected to be changed to 2020-21 by regulations under the Bill – see the Delegated Powers Memorandum. The reference year median income is adjusted for inflation, allowing this target to measure how the living standards of low income families have changed over time.

\(^2\) “Low income” is below 70% of equivalised median net household income, and “material deprivation” measures whether a family can afford certain items considered essential to a basic standard of living.
The targets are set on an “after housing costs” (AHC) basis. If they are not met, the Scottish Ministers must explain why they have not been met.

Various reporting mechanisms are set out in the Bill:

- The Scottish Government must prepare three delivery plans. The first is to be published in 2018 (covering the period 2018-2021). The second covers the period 2021 to 2026; and the third 2026 to 2031.
- The Scottish Government must report annually on progress toward tackling child poverty.
- A duty is placed on local authorities and health boards to produce an annual child poverty action report, setting out any action taken for the purpose of contributing to meeting the targets in the Bill.

3. Whether statutory targets are required

<table>
<thead>
<tr>
<th>Possible areas for discussion:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Whether statutory targets are needed to eradicate child poverty.</td>
</tr>
<tr>
<td>• Whether statutory targets will drive action to reduce child poverty (as compared with non-statutory targets).</td>
</tr>
</tbody>
</table>

The Bill’s Policy Memorandum justifies the use of statutory targets as they:

- are a clear, public statement outlining ambition and direction of travel;
- are a useful tool to galvanise…[the necessary] cross-Government action; and
- allow Parliament and the public to hold the Scottish Government to account.

The Policy Memorandum also notes the “serious concern” raised in the UN Committee on the Rights of the Child’s 2016 report about the repeal of the UK income-based child poverty targets.

Most respondents to the consultation agreed with the introduction of statutory targets, which have also been welcomed by the witnesses who submitted written evidence. However, a small number of local authorities questioned this approach as: (a) it was felt that the targets were “over-ambitious”\(^3\); or (b) the respondents were not convinced that the ambition to eradicate child poverty “requires to be embedded in statute”\(^4\).

4. The statutory targets

<table>
<thead>
<tr>
<th>Possible areas for discussion:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Whether the statutory targets are the right ones.</td>
</tr>
<tr>
<td>• The scale of Government action required to meet the targets, and how wider economic change is likely to affect this.</td>
</tr>
</tbody>
</table>


\(^4\) [https://consult.scotland.gov.uk/social-justice/consultation-on-a-child-poverty-bill-for-scotland/consultation/view_respondent?_b_index=60&uuId=723782681](https://consult.scotland.gov.uk/social-justice/consultation-on-a-child-poverty-bill-for-scotland/consultation/view_respondent?_b_index=60&uuId=723782681)
The Policy Memorandum describes the targets as “stretching and ambitious, but realistic”. To help the Committee scrutinise this assessment, this section presents the current Scottish child poverty statistics, some projections for the future levels of child poverty in the UK and information on some of the key drivers of child poverty.

**The current position**

On 16 March 2017, the Scottish Government published its 2015-16 poverty statistics in *Poverty and Income Inequality in Scotland: 2015/16*\(^5\). This shows that, compared with 2014-15:

- Relative poverty rose from 22 per cent to 26 per cent.
- Absolute poverty rose from 21 per cent to 24 per cent.
- The percentage of children in combined low income and material deprivation was unchanged at 12 per cent.

The statistics highlight that most of the year-on-year changes are not statistically significant, and that “looking at longer term trends in income offers a better indicator of significant change”\(^6\). To provide a longer term picture, Annexe A presents figures on relative child poverty, absolute child poverty and combined low income and material deprivation (all AHC) from 2000-01 to 2015-16. This shows that there has been little progress against any of these measures in the past ten years.

In 2015-16, the first experimental statistics were produced reporting on persistent poverty in Scotland. *Persistent Poverty in Scotland 2010-2015* shows that the percentage of children in persistent poverty (AHC) was unchanged at 12 per cent between the first period of analysis (the four year period 2010 to 2014) and the most recent period (2011 to 2015). The target for 2030-31 is no more than 5 per cent of children in persistent poverty.

The percentage of children in persistent poverty in Scotland is lower than in the other nations of the UK. In 2011-15, 16 per cent of children in England, 17 per cent of children in Northern Ireland and 20 per cent of children in Wales were in persistent poverty.

**Future Projections**

The Institute for Fiscal Studies (IFS) recently published *Living Standards, Poverty and Inequality in the UK: 2016–17 to 2021–22*. The report sets out projected levels of child poverty at the UK level up to 2021-22. Its projections are based on current government policy and Office for Budget Responsibility (OBR) central forecasts for earnings growth\(^7\). Acknowledging the increased uncertainty resulting from the vote to leave the EU, the analysis also considers the position if the OBR’s low and high estimates of earnings growth are accurate. The overall picture is that child poverty (AHC) is expected to rise in coming years. Annexe B shows IFS projections for relative poverty to 2020-21.

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\(^5\) This is an annual national statistics publication, which is published on the same day as the DWP’s *Households Below Average Income* statistics. Both use data from the Family Resources Survey.


\(^7\) Note that the report uses data from the Family Resources Survey 2014-15. The 2015-16 data has only just been published.
The Joseph Rowntree Foundation (JRF) written submission to the Committee points to its own long term modelling. This estimates that, in favourable economic circumstances, childcare reform, closing the gender pay gap and a range of social security changes could see relative child poverty fall to 13 per cent by 2040-41. JRF argues that that, even this “will take long-term, comprehensive action and a strong degree of cross-party agreement”.

**In-Work Poverty**

In-work poverty was an issue the Independent Advisor on Poverty and Inequality considered in her 2016 report *Shifting the Curve*. Her proposals included encouraging employers to sign up to the Living Wage Accreditation Scheme, encouraging pay ratio disclosure and ensuring childcare is affordable and high quality. Similar measures were suggested by JRF in *A Scotland without Poverty*. The Independent Advisor also mentions the use of in-work benefits, but her recommendation is that the Scottish Government “proceed with caution” in relation to its new social security powers.

*Shifting the Curve* does not mention the new power to top-up reserved benefits, or devolved areas of financial support such as council tax reduction (CTR)⁸. The potential to change the rate at which CTR is withdrawn as earnings increase was highlighted by JRF as part of discussions on the Committee’s work programme. CPAG in Scotland’s *Programme for Scottish Government 2016-21* calls for the power to top-up benefits to be used to top up child benefit, while the JRF report *We Can Solve Poverty in the UK* suggests increasing universal credit (UC) rates in line with inflation, and increasing the child allowance in UC more quickly still.

The IFS suggests that tax and benefit changes explain about a third of the projected increase in relative poverty at the UK level. However, “most of the increase is ...explained by earnings growth benefiting middle-income households more than lower-income ones”⁹. In contrast, the projected increase in absolute child poverty is “entirely explained” by tax and benefit changes.

**Housing Costs**

The targets being set after housing costs (AHC) makes achievement more challenging, as poverty levels are generally higher AHC. However, an AHC measure was endorsed by the majority of respondents to the consultation. The Independent Advisor on Poverty and Inequality is of the view that “this is a more important way of looking at poverty”, as it takes account of housing affordability. JRF’s written evidence to the Committee also highlights the increasing disparity between child poverty rates before and after housing costs.

While emphasising the uncertainty of the interaction between social security changes and rent levels, the IFS highlights that: “the freezing of local housing allowances (LHAs) ... [means] that many poorer households are now fully exposed to rent rises”¹⁰. This issue has received less political attention in Scotland than the implications of UK

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⁸ Whilst levers such as the amount of earnings a family keeps before universal credit/tax credits are reduced remain reserved to Westminster, top-ups to the amounts for children in these benefits would benefit both in and out of work families. A similar policy has been introduced in CTR from April 2017.  
⁹ https://www.ifs.org.uk/publications/8957  
Government reforms to housing benefit / universal credit for social tenants (commonly referred to as the “bedroom tax”).

5. Proposals for other targets

Possible areas for discussion:

- Whether the proposed targets are sufficient to demonstrate that, if they are met, child poverty will have been eradicated.
- Whether interim targets are needed to ensure early action to reduce child poverty
- Whether the addition of further targets could contribute to eradicating child poverty, and if so what should be included.

**Ongoing targets**

A number of responses to the consultation questioned whether the target year should be seen as the end of the process of eradicating child poverty. For example, Aberlour Child Care Care Trust stated that “setting and achieving the… targets … should simply encourage [the Scottish Government] to set and realise more ambitious targets to ensure that in the future no child in Scotland will ever experience poverty”\(^{11}\).

**Interim targets**

End Child Poverty’s response to the consultation argued that “there is a need for the legislation to include interim targets to ensure the Scottish Government and other public bodies are on track towards achieving the 2030 target.” Other respondents to the consultation had similar views, and CPAG and End Child Poverty’s written submissions suggest that “halfway” targets to be met in 2024 may be a useful approach.

In written evidence to the Committee JRF suggests that 2023-24 is a good point for a “more thorough review of the rate of progress”, whilst NHS Greater Glasgow and Clyde (NHSGGC) also suggests “an interim review of the targets to ensure the direction of travel is being achieved locally and nationally”.

**Living standards targets**

In A Scotland without Poverty, JRF noted that low-income households spend more of their net income on essential goods and services (e.g. rent, energy, food) than others, the costs of which has been rising faster than inflation in recent years:

> “The challenge is more acute when low income households face extra costs related to illness or disability, or pay more for the same basic goods and services due to poverty - the ‘poverty premium’.”

The JRF response to the consultation suggested similar amendments to the targets to those proposed in its written evidence to the Committee:

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\(^{11}\) See p17 of the summary of consultation responses
• Measuring household income after housing costs and “essential costs”, such as childcare, energy and insurance.

• Defining “persistent poverty” as in relative poverty for two of the last three years (not three of the last four). JRF argue that “even this is too long for families with children, especially for under-fives”.

• A target for severe poverty – children living far below the poverty threshold.

The CPAG in Scotland response to the consultation also suggested publishing information on the depth of poverty and the proportion of households below the minimum income standards established by JRF. Another suggestion CPAG made was to report poverty rates after childcare costs.

**Other Suggestions**

Suggestions for additional targets in responses to the consultation included:  

• A severe poverty target was also suggested by other respondents.

• An in-work poverty target (number of households with an adult in work living in poverty).

• An income inequality measure (for example the Gini coefficient or 20:20 ratio).  

In contrast, the targets in the Bill only compare the median income with low incomes.

• A measure of inconsistency of income, capturing people who fall into and out of poverty several times in the same year (suggested by Glasgow Centre for Population Health).

6. Local Activity to Tackle Child Poverty

Possible areas for discussion:

• Whether the reporting requirements on local authorities and health boards set out in the Bill are proportionate and appropriate.

• Whether those working at the local level feel they control sufficient levers to make a meaningful contribution to tackling child poverty

• The mechanisms / resources needed to enable local authorities and territorial health boards to produce an annual joint action report.

• Given that child poverty levels differ between local authorities, whether specific steps need to be taken to support those areas with higher rates of child poverty.

As noted above, one of the provisions in the Bill is that local authorities and health boards must produce an annual joint child poverty action report that sets out the measures being taken at the local level to tackle child poverty. There are no other

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12 See pp15-16 of the summary of consultation responses for a full list of the additional suggestions.

13 These both measure the overall distribution of income within a society (other options would be the Palma ratio or the 90:10 ratio)
requirements on local level public bodies e.g. preparing a plan for future action, consulting with relevant stakeholders on their plans or taking independent advice on their activities.

End Child Poverty’s written evidence argues that “the legislation should ensure that there is a clear duty on local authorities and health boards to take a strategic approach to reducing child poverty in their area”. NHSGGC suggest in their written evidence that Community Planning Partnerships and Integrated Joints Boards “should be included in the duty given their role in planning and delivering services at a local level”, whilst CPAG’s written evidence suggests that “Health and Social Care Partnerships, for example, have a key role in local policy”.

Perhaps offering an alternative mechanism through which to report and take action at the local level is the proposal presented in the Programme for Government 2016 to bring forward the socio-economic duty laid through the Equality Act 2010 but never introduced at UK level. The Fairer Scotland Action Plan points out that a new socio-economic duty on public bodies (including local authorities) in Scotland will be introduced in 2017. Its intention is to make sure that “the sector takes full account of poverty and disadvantage when key decisions are being made”. The Policy Memorandum describes the socio-economic duty as one of a range of actions that will “help deliver the ambition to eradicate child poverty”.

**Child Poverty at the Local Level**

Figures produced by End Child Poverty show that child poverty rates differ widely across different Scottish local authorities. Figure 1 shows that across Scotland the proportion of children living in low income households was 23.3 per cent. In Glasgow the rate was 34.1 per cent, while at the other end of the scale in the Shetland Islands the figure was 10.6 per cent.

**Figure 1: Percentage of children in low income families (AHC) by local authority, December 2015**

![Bar chart showing percentage of children in low income families by local authority, with the highest rate in Glasgow at 34.1% and the lowest in Shetland at 10.6%](../images/chart.jpg)

Source: End Child Poverty  See Annexe C for accompanying figures.

Given the differences in child poverty rates across Scotland, different areas are likely to face different challenges, in terms of the measures needed to contribute to achieving the Scotland-wide goal of eradicating child poverty.
7. Oversight and Scrutiny

Possible areas for discussion:

- Whether the forthcoming Poverty and Inequality Commission or the Ministerial Advisory Group on Child Poverty should be given a statutory oversight role.
- Whether the proposed scrutiny of the Scottish Ministers plans and progress should be supplemented with other independent scrutiny.
- Whether the Bill should prescribe areas of policy that must be addressed in Child Poverty delivery plans.

**Statutory oversight of progress in reducing child poverty**

A number of local authorities in Scotland have established poverty and fairness commissions to work at the local level to tackle poverty and inequality. The *Fairer Scotland Action Plan* states that the Scottish Government will build on the work of these local fairness and poverty commissions by establishing a national Poverty and Inequality Commission (“the Commission”) in 2017-18. However, there is no provision in the Bill for any statutory oversight of activity to achieve the child poverty targets, either via the functions performed by the Commission or from the Ministerial Advisory Group on Child Poverty. End Child Poverty's written evidence to the Committee argues for a statutory oversight body to be established and that:

“...the performance of these functions – by a body whose role and independence are established and protected in statute – could be extremely important in ensuring that there is an expert source of independent scrutiny and oversight. The body’s legislative underpinning would ensure that it could speak freely and be critical of the government where necessary.”

The main provision that allows scrutiny of the action being taken comes from the requirement for Scottish Ministers to lay child poverty delivery plans and progress reports before Parliament. Ministers must also consult with local authorities and “such other persons and organisations… as they consider appropriate” (Section 7 of the Bill) in preparing delivery plans. However, there is no duty to have regard to any advice received.

In contrast, the *Child Poverty Act 2010* (“the 2010 Act”) - as introduced - established a Child Poverty Commission and required Ministers to seek its advice in drawing up child poverty strategies. Ministers also had a duty to “have regard” to the advice of the Child Poverty Commission and strategies produced by the devolved administrations.

**Content of delivery plans**

Another difference between the 2010 Act and the Bill is that the Bill does not prescribe matters that must be considered in preparing a delivery plan. In preparing a child

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14 For example, there are the *Fairer Fife Commission*, the *Renfrewshire Commission on Tackling Poverty*, the *Glasgow Poverty Leadership Panel*, the *Dundee Fairness Commission*, *Equal Shetland*, the *East Lothian Poverty Commission*, the *Perth & Kinross Fairness Commission* and recently the *North Lanarkshire Fairness Commission*. 
poverty strategy under the 2010 Act, the Secretary of State had to consider whether measures were required in the following areas:

- promotion of parental employment and skills development
- financial support for children and parents
- information and advice to parents and promotion of parenting skills
- health, education, childcare and social services
- housing, the environment and social inclusion.

In each of these areas, there was a further duty to consider groups at high risk of poverty and the likely effect of any possible measures on those groups. A strategy also had to describe any other action taken (beyond those aimed at meeting the targets) “for the purpose of ensuring as far as possible that children in the United Kingdom do not experience socio-economic disadvantage”.

Submissions from witnesses suggest that a similar approach should be taken. CPAG’s written submission argues that:

“Delivery Plans should describe how the Scottish Government will use all of the major financial and policy tools at its disposal to progress towards these targets. The legislation or subsequent regulations should therefore include a list of policy areas that must be covered in the delivery plans. These might include, for example, the facilitation of employment for parents and carers, the full use of Scottish social security powers, the provision of information, advice and assistance, access to affordable housing and childcare.”

Both End Child Poverty and NHSGGS include similar lists of areas that should be covered by delivery plans in their written evidence. The JRF in its written evidence argues that delivery plans should be “co-produced with local agencies”, and also suggests that delivery plans are instead published early in each Parliamentary term, as “one Government and Parliament cannot bind the next”.

**The Child Poverty Measurement Framework**

End Child Poverty argue in their written evidence to the Committee that “it would be helpful for the legislation to set out the key areas to be covered by the [Child Poverty Measurement] framework” – and that similar areas should be included in it to the delivery plans. Without taking a view on whether it should be statutory, the JRF written evidence to the Committee argues for a “revised set of ‘pockets’ indicators (covering incomes, deprivation and costs)”.

Some aspects of the current measurement framework were criticised in responses to the consultation. NHSGGC’s written evidence to the Committee points out that:

“some of the framework indicators, particularly those related to health and improving prospects, are about the impact rather than the cause of poverty (e.g. tobacco consumption, diet, physical activity levels of children in low income households).”

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15 See pp29-36 of the summary of consultation responses
Whilst it is not clear if this is being proposed as something that should be included on the face of the Bill, NHSGGC also argue that the framework must capture the gendered nature of poverty, and the needs of particularly vulnerable groups.

Jon Shaw and Suzi Macpherson
SPICe Research
13 April 2017

Note: Committee briefing papers are provided by SPICe for the use of Scottish Parliament committees and clerking staff. They provide focused information or respond to specific questions or areas of interest to committees and are not intended to offer comprehensive coverage of a subject area.

Annexe A: Percentage of Scottish children living in poverty (AHC), 2000-01 to 2015-16

Annexe B: IFS projections of relative poverty levels (AHC) in the UK to 2020-21

Source: https://www.ifs.org.uk/uploads/publications/comms/R127.pdf, Figure 3.5
### Annexe C: Number and proportion of children in poverty in Scotland, by local authority, December 2015

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Number of children in poverty, AHC, Dec 2015</th>
<th>% of children in low income families, AHC, Dec 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Glasgow City</td>
<td>37,387</td>
<td>34.1%</td>
</tr>
<tr>
<td>North Ayrshire</td>
<td>8,303</td>
<td>30.4%</td>
</tr>
<tr>
<td>East Ayrshire</td>
<td>6,826</td>
<td>28.0%</td>
</tr>
<tr>
<td>Inverclyde</td>
<td>4,340</td>
<td>27.9%</td>
</tr>
<tr>
<td>Dundee City</td>
<td>7,509</td>
<td>27.7%</td>
</tr>
<tr>
<td>Clackmannanshire</td>
<td>2,913</td>
<td>27.3%</td>
</tr>
<tr>
<td>West Dunbartonshire</td>
<td>4,927</td>
<td>26.5%</td>
</tr>
<tr>
<td>South Ayrshire</td>
<td>5,267</td>
<td>25.7%</td>
</tr>
<tr>
<td>Fife</td>
<td>18,217</td>
<td>25.0%</td>
</tr>
<tr>
<td>North Lanarkshire</td>
<td>18,112</td>
<td>25.0%</td>
</tr>
<tr>
<td>Dumfries and Galloway</td>
<td>6,713</td>
<td>24.3%</td>
</tr>
<tr>
<td>Renfrewshire</td>
<td>8,098</td>
<td>23.6%</td>
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<tr>
<td>West Lothian</td>
<td>8,930</td>
<td>22.8%</td>
</tr>
<tr>
<td>Midlothian</td>
<td>4,062</td>
<td>22.5%</td>
</tr>
<tr>
<td>Falkirk</td>
<td>6,981</td>
<td>22.0%</td>
</tr>
<tr>
<td>Edinburgh, City of</td>
<td>17,363</td>
<td>22.0%</td>
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<tr>
<td>South Lanarkshire</td>
<td>14,042</td>
<td>22.0%</td>
</tr>
<tr>
<td>Scottish Borders</td>
<td>4,556</td>
<td>21.0%</td>
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<tr>
<td>Angus</td>
<td>4,594</td>
<td>20.6%</td>
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<tr>
<td>Argyll and Bute</td>
<td>3,176</td>
<td>20.4%</td>
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<tr>
<td>East Lothian</td>
<td>4,276</td>
<td>20.3%</td>
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<tr>
<td>Highland</td>
<td>8,503</td>
<td>19.2%</td>
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<tr>
<td>Stirling</td>
<td>3,217</td>
<td>18.8%</td>
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<tr>
<td>Perth and Kinross</td>
<td>5,003</td>
<td>18.2%</td>
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<tr>
<td>Aberdeen City</td>
<td>6,266</td>
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<td>Eilean Siar</td>
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<td>Moray</td>
<td>3,049</td>
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<td>Shetland Islands</td>
<td>498</td>
<td>10.6%</td>
</tr>
<tr>
<td><strong>Total Scotland</strong></td>
<td><strong>23.3%</strong></td>
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1. Introduction

This paper summarises the responses to the Committee’s call for views in relation to the Child Poverty (Scotland) Bill. Thirty nine submissions were received by 31 March 2017:

- Fourteen were from the voluntary sector
- Ten were from local government organisations (including COSLA and two local partnerships involving the NHS),
- Four were from the health sector (including two local NHS Boards)
- Three were from academics
- Two were from individuals
- The remaining six were from other organisations.

All published submissions can be found on the Social Security Committee webpage.

In addition, the Finance and Constitution Committee received 12 submissions in response to its call for views on the Bill’s Financial Memorandum (FM). Nine were from local authorities, two from health boards and one from Social Work Scotland. Key points from these submissions are provided at section 11 of this paper.

2. Main messages

- There was strong support for the reintroduction of statutory targets focused on measuring household income.
- The targets in the Bill were felt to be appropriate. Respondents made a variety of suggestions for additions and refinements, without any consensus around particular changes to the targets.
- The majority of respondents agreed that interim targets should be established. The suggested dates for reporting varied; with the most common suggestions being the half way point in the life of the legislation (2024) or the end of each delivery plan period (2021 and 2026).

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1 The submissions can be found at this link: http://www.parliament.scot/parliamentarybusiness/CurrentCommittees/103786.aspx
Many were supportive of the proposed reporting structures. There were, however, concerns that the legislation as currently drafted does not provide sufficient mechanism for scrutiny of progress against targets.

Some concerns were raised about whether the reporting duty placed on local authorities and health boards included all relevant local actors. There were also those who argued that the Bill should be amended to include a duty on local level public bodies / partnerships to plan and take action to reduce child poverty.

The majority of respondents suggested that the Child Poverty Measurement Framework (CPMF) should be reviewed. Various suggestions were made for revisions; with several proposing a stronger link to the statutory targets.

There was significant support for the establishment of a Poverty and Inequality Commission. The main reason was to ensure scrutiny of progress against the targets. Some respondents specifically called for this body to be independent of the Scottish Government.

Many respondents proposed that action to address child poverty in Scotland needs to be situated in the wider policy landscape. Specifically, there was a call for the Scottish Government to use its new social security powers (for example to top up child benefit). There was also a call that action to measure and address child poverty take account of the particular vulnerabilities of specific groups e.g. lone parent households, households with a disabled person and refugee and asylum seeker households.

The responses to the call for views from the Finance and Constitution Committee pointed to the limited scope of the FM in focusing only on the cost of producing child poverty action reports. All respondents stressed that the largest costs come with developing and delivering services to achieve the child poverty targets; the costs of which are not estimated in the FM.

3. Reintroducing statutory child poverty targets

All respondents who answered this question agreed that statutory targets should be introduced in Scotland, with only two respondents not answering the question. The reasons for supporting the reintroduction of targets were broadly similar, and echoed points made in response to the Scottish Government’s consultation on a proposed Bill. COSLA, for example, said: “embedding the targets in statute ensures that the issue remains at the forefront of the national conscious[ness] and can be used to monitor progress”.

Some respondents were explicit in their support, not just for the introduction of statutory targets, but for the use of a set of income-based targets. For example, Child Poverty Action Group in Scotland (CPAG):

“...believe that retaining a focus on income based targets in this legislation is the correct approach. Only by maximising the financial resources available to families in Scotland can real and lasting progress be made towards improving child wellbeing.”

4. Appropriateness and scope of the proposed targets

The majority of respondents were clearly in favour of the four targets currently on the face of the Bill. However, several respondents, including the Joseph Rowntree Foundation (JRF), the Poverty Alliance, Citizens Advice Scotland (CAS) and Fife Partnership, argued that statutory child poverty targets should form part of a wider all age anti-poverty strategy.
A number of respondents welcomed the ambitiousness of the targets, particularly when the targets are to be met on an after housing costs (AHC) basis. For example, the Scottish Human Rights Commission pointed out that “the Scottish Government is actually aiming for similar or even more ambitious targets than [those set by the UN Sustainable Development Goals in relation to poverty reduction].”

There were a few respondents that considered whether the targets are achievable. For example, Dr Treanor, while supportive of the introduction of these targets, explicitly asked whether they can be achieved. Similarly, the City of Edinburgh Council questioned whether such ambitious targets have ever been achieved by comparable nations on a similar timescale. In contrast, CPAG, JRF and Shelter called for more ambitious targets to be considered, specifically for measuring the scale of persistent poverty. Shelter, for example, suggested that the persistent poverty measure should include those living in relative poverty in two out of four years:

“Given the importance of a child’s development and education, we strongly believe that a two-year period more adequately reflects the devastating and long-term effects that poverty has on children than a three year period.”

There were no suggestions that the child poverty targets should be set before housing costs. Some respondents did, however, query whether the current AHC measure reflects actual disposable income. As Aberdeenshire Community Planning Partnership put it, “one area that income-based approaches struggle to adequately capture is ‘cash in hand’ income and how income of this type varies over time”.

There were a range of issues raised by respondents that highlight concerns about the limitations of the current AHC measure. For example, JRF called for the use of an “after essential costs” focus rather than just AHC so as to recognise the costs of housing, but also childcare, energy bills, etc. Similarly, Inclusion Scotland and JRF both asked that the additional costs associated with disability are recognised, while Shelter pointed out that the AHC measure does not include the costs of making capital repayments on a mortgage.

Both Shelter and the Scottish Youth Parliament noted the importance of capturing levels of debt and how this affects experiences and incidences of poverty. Shelter and Fife Partnership further proposed using the JRF Minimum Income Standard as a way of capturing a range of household costs beyond only housing.

Several respondents highlighted the greater risk of poverty faced by some groups. For example:

- Women
- Young carers
- Children and young people with experience of the care system
- People living in rural areas
- Disabled children and parents
- Ethnic minorities
- Refugees and asylum seekers.

In light of different groups being more or less at risk of experiencing poverty, the Coalition for Racial Equality and Rights suggested that the Committee should consider holding a separate evidence session to consider the Equality Impact Assessment accompanying the Bill.
Some respondents called for additional targets to be included in the Bill. For example, CAS suggested an additional target for the number of people in severe poverty, while the Big Lottery Foundation (BLF) “would value a focus on ‘depth’ of poverty”. These issues chime with points highlighted in the analysis of responses to the Scottish Government consultation on a proposed child poverty bill.

Glasgow Council for the Voluntary Sector suggested an additional target for the number of children in households with unreliable or fluctuating incomes, while the Lloyds TSB Foundation suggested that the legislation should include a target that no local area should have child poverty levels that are above the national target level. The two local authorities with the highest current levels of child poverty (Glasgow and North Ayrshire) argued that resource allocation needs to reflect the greater challenge some areas will face in meeting the child poverty targets. North Ayrshire Council also suggested that any interim targets that might be set may need to allow some variance at the local level, to reflect the particularly high levels of child poverty in some areas of Scotland.

NHS Greater Glasgow and Clyde pointed out that the way in which the targets are set may incentivise a targeted approach, arguing that “the likely impact, therefore, of successful action will be to create a J-shaped socioeconomic gradient in outcomes”. Making a similar point, Shelter, East Ayrshire Council and NHS Ayrshire and Arran suggested measuring income disparity across the whole population, using for example the GINI coefficient or the slope of poverty.

Finally, there were seven respondents that questioned the Bill having a final target year at which point a significant number of children will still live in poverty. In response to this, the Scottish Youth Parliament suggested that “by 2030 government targets should be met and new ones should be set”.

5. Interim targets

Twenty five of the respondents stated their support for the introduction of interim targets. The main reason was that these will provide an opportunity to focus on progress towards the 2030 target, including whether policy measures are having a positive impact on children’s lives now (Inclusion Scotland). Not all made clear that they would seek to see any reporting of interim targets laid out in legislation (e.g. JRF). However, members of the End Child Poverty in Scotland (ECP) coalition were among those that argued for interim targets to be included in the legislation, to allow public and political scrutiny of progress toward the 2030 targets.

A key theme in relation to the delivery of the targets and interim targets was the need for reliable data / evidence to assist with tracking progress and achieving the targets set. For example, CAS stated that analysis should be pursued by the Scottish Government to explore the feasibility of reducing child poverty by specific dates and the steps that would be required to achieve these targets. With this information, the Scottish Government could then set realistic interim targets.

Fife Partnership was one of few respondents that did not see the value of setting interim targets. Rather, it felt that the early years of developing a new / enhanced approach to

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tackling child poverty should “concentrate more on ensuring commitment, areas of action and clear approaches to sharing learning across the country” rather than reporting on targets. The Scottish Human Rights Commission similarly felt that, while interim targets are a useful means to ensure momentum is maintained, especially given that the targets cover such a long timeframe, identifying what progress should have been achieved by a specific time might better be achieved through the CPMF.

There were two alternative timelines against which interim targets were suggested to best be reported. For ECP members the view was that 2024 would be sensible as this is half-way point in the life of the legislation (see Barnardo’s, CPAG and the Poverty Alliance). Public bodies were more likely to suggest the end of the period of each delivery plan i.e. 2021 and 2026 as the time to report progress against interim targets (Aberdeenshire CPP, City of Edinburgh Council and NHS Ayrshire and Arran).

Some practicalities about reporting against interim targets were also highlighted. For example:

- Shelter Scotland suggested that reporting against interim targets should be part of established reporting mechanisms to reduce the potential for multiple reporting in a context of limited resources.
- NHS Health Scotland and Lloyds TSB Foundation suggested that reporting on progress against any agreed interim targets should take place at both the local and national level.
- Scottish Borders Child Protection Committee and the Royal College of Paediatric Child Health (RCPCH) requested that, in developing interim targets, accompanying information should be provided both on the consequences or actions that will follow if interim targets are not met and on the levers and incentives that could be deployed to ensure that they are.

6. Reporting arrangements / holding the Scottish Government to account

All respondents broadly accepted the proposal in the Bill that Scottish Ministers produce a delivery plan. There was, however, divergence in views on the frequency and content of the delivery plan as well as on other reporting and consultation requirements laid out in the Bill.

In relation to delivery plans, Children in Scotland and CAS both recommended that these be produced at three yearly intervals rather than every five years. Both argued that this shorter timeframe should be sufficient to allow changes to be captured. CAS stated that three yearly reports allow for “more focussed objectives covering the medium term, [while ensuring that] the issue is never far from Ministers’ minds”. While others, e.g. JRF, highlight that delivery plans should be timed in such a way that a new government coming to power should not be bound by the priorities of the previous administration.

Dr Treanor, CAS and ECP members called for the Bill to contain details on the issues that should be included in delivery plans and annual reports. Barnardo’s is one of the ECP members that listed the issues that Ministers should be required to report on in delivery plans:

- The full use of Scottish social security powers.
- The provision of information, advice and assistance to parents and carers in relation to welfare rights and income maximisation.
- The provision of suitable and affordable housing.
• The availability of childcare.
• The facilitation of employment for parents and carers.

Children in Scotland listed the same issues, arguing that these should be set out in legislation to ensure they are recognised and prioritised: “we are concerned that, if omitted, achieving the 2030 target may become less likely” (Children in Scotland).

The Law Society of Scotland was explicit in highlighting a lack of accountability in the Bill as currently drafted:

“The requirements for the Scottish Ministers to develop and produce Delivery Plans and to prepare and lay progress reports annually will encourage progress, scrutiny and oversight. However, we are concerned that these measures alone will not secure the success of the Bill’s aims. It is unclear to us what the consequences, if any, would be if the targets are not met. We question whether the Bill, in its current form, is justiciable and are concerned that it could prove largely unenforceable and therefore ineffective.”

In an attempt to address a perceived lack of accountability, both Inclusion Scotland and the Poverty Alliance called for the Bill to include additional reporting provisions. Their proposals were that: (a) reports should not just be laid with the Scottish Parliament but require Parliamentary approval; and (b) laid reports should be scrutinised by the Scottish Parliament prior to publication.

There were a number of additional proposals for reporting made by respondents, which included:

• NHS Ayrshire and Arran and NHS Greater Glasgow and Clyde both noted that local partnership initiatives e.g. Integrated Joint Boards and CPPs should play a central role in shaping the focus and content of delivery plans as well as in embedding legislation and implementing the delivery plan at the local level.
• The Carers Trust and Scottish Youth Parliament called for child poverty reports to be presented in such a way that they are accessible to all.
• Lloyds TSB Foundation suggested the Scottish Government should produce periodic projections as to whether or not the targets are on track and the steps / actions it intended to take to increase the speed of progress if required.
• On a similar theme, the Poverty Alliance pointed out that it is not sufficient to report that targets have not been met and explain why not. If targets are not met, new targets should be set and detail reported on how these are to be achieved.
• NHS Ayrshire and Arran and NHS Greater Glasgow and Clyde called for guidance from the Scottish Government to spell out what is expected from local partners through annual reports and who is responsible for achieving the targets at local, regional and national levels.

Four respondents explicitly requested that, in addition to reporting on the legislative targets (on an after housing costs basis), child poverty statistics should continue to report figures on a before housing costs basis. The Scottish Human Rights Commission, for example, said:

“The Commission would…recommend that the government continue to publish and compare income before and after housing costs in order to provide statistics for intentional comparison and so that the relative contribution of housing costs to poverty can be monitored.”
As part of the duty on Scottish Ministers to produce three delivery plans during the life of the legislation, there is a duty to consult local authorities, representative organisations for children and parents and any other person considered appropriate. A number of respondents called for the consultation requirements in the Bill to be extended to include direct engagement with children (the Big Lottery Fund, Children in Scotland, the Scottish Human Rights Commission, RCPCH and the Scottish Youth Parliament), people living in poverty (The Poverty Alliance and Glasgow City Council) or organisations representing those disproportionately affected by poverty, including disabled people’s organisations (Inclusion Scotland). There was also a call from Renfrewshire Council for any reports on progress against the delivery plan to be: "accessible, meaningful and transparent to people living in poverty across Scotland". Similarly, the Lloyds TSB Foundation called for a requirement that a child-friendly version of all reports is produced.

7. Responsibilities on local councils and health boards

Some local authority and NHS respondents questioned whether the duty to report should be placed on a broader range of organisations. Aberdeenshire Community Planning Partnership (CPP) suggested that CPPs should be added to the face of the Bill, describing the current provision as a “missed opportunity to ensure reporting of the fullest possible range of actions at a local level”. Several responses also suggested that consideration should be given to the potential role of local Health and Social Care partnerships in producing reports.

Renfrewshire Council pointed out that most health boards work across more than one local authority area, highlighting that NHS Greater Glasgow and Clyde will be involved in eight separate joint reports.3 This was one of a number of comments that touched on the complexity of the reporting landscape at a local level. Some respondents suggested that the reporting requirement should be flexible, with Glasgow City Council arguing that “councils and health boards should have the flexibility to meet the reporting requirement in the way that best fits their established planning and reporting mechanisms”. NHS Greater Glasgow and Clyde suggested that activity to reduce child poverty should be included in “Children’s Service Plans4 and Local Outcome Improvement Plans5, but without making an explicit call for a single annual report.

Members of ECP argued that a duty to report progress is insufficient and that: “the legislation should ensure there is a clear duty on local authorities and health boards to take a strategic approach to reducing child poverty in their area” (ECP). This was also the view of a number of other respondents, including some of those that would be subject to this duty e.g. NHS Greater Glasgow and Clyde, Fife Partnership and Renfrewshire Council:

“…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 co-ordinated approach to tackling poverty” (Renfrewshire Council)

Almost half of the respondents favoured local action planning to augment the duty set out at section 10 of the Bill – to produce an annual child poverty action report – although not all

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3 The reports for North and South Lanarkshire will also involve two different health boards.
4 s8 of the Children and Young People (Scotland) Act 2014 requires a local authority and the relevant health board to produce a Children’s Services Plan every 3 years and report on it annually
5 s6 of the Community Empowerment (Scotland) Act 2015 requires a Community Planning Partnership to produce a Local Outcomes Improvement Plan and report on it annually.
expressed a view as to whether this should be a statutory duty. JRF suggested that the actions contained in Local Outcome Improvement Plans that are having the greatest impact on poverty levels could feed into “a [national] delivery plan that is co-produced with local partners”. North Ayrshire Council argued that “any proposed child poverty duty should also be applied to all Community Planning Partners”.

Several responses (the majority being local authorities or health boards) made clear that additional local resources would be required to meet any new local duties. This was also a theme of the responses to the consultation on the Financial Memorandum (see section 11 of this paper).

8. The Child Poverty Measurement Framework

There were a diverse range of views on the Child Poverty Measurement Framework (CPMF). Of the large majority of respondents who answered this question, only a couple supported using the existing framework unchanged. The RCPCH argued strongly for the retention of health indicators within the existing framework, as “the link between low incomes and poor health outcomes is well established”. It also supported keeping some of the individual indicators that were widely criticised by those responding to the Scottish Government consultation on this Bill.

Within the responses arguing for a review of the framework, some broad groups can be identified. Whilst the majority argued for a review without suggesting their preferred outcome (in terms of the number of indicators used), a few respondents suggested reducing the number of indicators. For example, BLF stated that “measuring a smaller number of critical measures works well”.

More responses to this question suggested specific additions to the indicators than wanted to see the number reduced. The responses varied in the level of detail given. For example, CAS gave a list of suggested additional indicators focused on “pockets”, arguing that the current list is constrained by the requirement in the Child Poverty Act 2010 that a Scottish strategy must not cover reserved matters. Shelter provided a list of nine suggested new indicators, split between “pockets” and “places”, with the latter linked to housing conditions. There is more detail below under discussion of the three themes in the current CPMF: pockets; places; and prospects.

Among those arguing for a wider measurement framework, some were concerned to rectify a perceived inadequacy in attention to particular groups. For example, Inclusion Scotland pointed out the disparity in the percentage of disabled and non-disabled people who are in employment or young people in “positive destinations” meaning that an overall improvement against an indicator may be masking increasing inequality between different groups. Similarly, the Coalition for Racial Equality and Rights argued that a focus on closing the attainment gap may not address higher child poverty rates for ethnic minorities, as “poor educational attainment is not necessarily an indicator of poverty for non-white minority ethnic children”. The Scottish Refugee Council called for inclusion of an indicator to capture “immigration-related income reduction”.

Even among those that did not support extending the CPMF, there were calls for the indicators to be disaggregated to capture other inequalities. Children in Scotland gave the examples of “families with disabilities, mental health problems or other additional support needs” while NHS Greater Glasgow and Clyde mentioned a wide range of equality groups, with a particular emphasis on gender and poverty.
A number of respondents felt that, as East Ayrshire Council put it, “work would be required to enhance datasets to ensure suitable coverage… at a partnership level”. COSLA suggested that “the focus of the measurement framework should essentially be on the quality, validity and frequency of data collection… ideally … disaggregated to a local level”. All respondents who raised the issue were in favour of using indicators that allow for robust local reporting.

A group of respondents (the majority of whom are members of the ECP coalition) suggested that reference to the measurement framework should be made in the Bill. Some explicitly linked this to their suggestion for the delivery plan to have prescribed themes (as discussed earlier) which are set out on the face of the Bill.

A few respondents mentioned that a number of the existing indicators relate to adults, and that data relating to the experience of children would be preferable.

The majority of respondents who expressed a view agreed with the three themes in the CPMF of: “pockets”, “prospects” and “places”, which are discussed further below.

**Pockets**

A number of respondents suggested augmenting the pockets measures. For example, NHS Health Scotland proposed that (amongst other changes) “the 4 statutory income measures should be added to the pockets domain”. This was one of a number of responses that suggested that the CPMF should have a closer link to the statutory targets. Other suggestions under this theme included uptake of social security benefits or local authority means-tested support, adequacy of benefit rates, irregular employment and in-work poverty levels.

**Prospects**

The prospects measures generated a particularly wide range of responses. For example, Renfrewshire Council argued that, whilst measures of individual health 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”. In contrast, there were others that argued for a greater use of health indicators. This was mentioned by a number of health organisations and by Glasgow Council for the Voluntary Sector, which suggested using measures developed by Glasgow Centre for Population Health.

Dr Treanor described herself as “deeply concerned by some of these indicators”. She gave examples of the infrequency of data publication for some of the surveys used to gather the data. Her response questioned the definition of “poor children”, describing one survey as using “an outmoded ‘family affluence’ variable based on car and computer ownership”. Also criticised were the inclusion of individual indicators, and the failure to include a comparison group against which the “poorest children” can be judged. This stands in stark contrast to the response from the RCPCH, which strongly supported the current set of indicators

There were a range of additional indicators suggested under this theme, including proxies for maternal health, birth-weight or childhood obesity, development indicators at 27-30 months, and “adverse childhood experiences”.

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6 The Scottish Government suggested in its [Consultation on a child Poverty Bill for Scotland](#) that the targets in the Bill will be added to the CPMF.
**Places**

The places measures raised concerns among some respondents about not capturing data on children who live in poverty but do not live in a deprived area. Children 1st pointed out that, even in a relatively wealthy city such as Edinburgh, every council ward has a child poverty rate of over 10 per cent. JRF further highlighted that the concentration of poor households in the poorest neighbourhoods varies widely across different local authority areas. For some respondents it was felt there should be closer links between the CPMF and the Scottish Index of Multiple Deprivation (SIMD) methodology. Others cautioned against giving too much attention to “places” at the expense of data on household income.

Additional measures capturing the quality of housing were mentioned by some respondents (in some cases it was felt that this was a “pockets” issue predominantly). NHS Ayrshire and Arran suggested measuring the quantity of off-licences and betting shops in an area as a way of measuring “social impacts [of] poverty”.

**9. Status and powers of the poverty and inequality commission**

The majority of respondents welcomed plans for establishing a Poverty and Inequality Commission. While some respondents did not express a view on the status and powers that this Commission may hold in relation to child poverty, there were those that called for the role and function of the Commission to be spelled out on the face of the Bill:

“As an ECP member we believe there is a need for an independent body to perform some of the roles previously fulfilled by the Child Poverty and Social Mobility Commission at UK level. Under the Child Poverty Act 2010, the Child Poverty and Social Mobility Commission was charged – amongst other things - with a duty to publish an annual report setting out its views on the progress made towards the income targets. The performance of these functions – by a body whose role and independence are established and protected in statute – could be extremely important in ensuring that there is an expert source of independent scrutiny and oversight. The body’s legislative underpinning would ensure that it could speak freely and be critical of the government where necessary.” (Children in Scotland)

In highlighting concern about the Commission not being mentioned on the face of the Bill, Inclusion Scotland argued that the Commission needs to be independent of the Scottish Government so as to avoid being seen to be working “at the behest of Ministers”. Without this, it is argued, the Commission’s “status as an independent body, able to fearlessly hold the Government to account, could be somewhat compromised” (Inclusion Scotland).

The submission from Scottish Borders Child Protection Committee highlights a mixed view on the status of the Commission. Its membership did not have a consensus view, with some members arguing that an independent Commission was necessary, while others considered that another ‘quango’ would not be the answer. For the latter group, the proposal was that equality / poverty issues should be mainstreamed into the activities of all Scottish Government departments.

A number of the submissions made specific suggestions about the role the Commission should perform:

- Engaging with people with experience of poverty (Shelter Scotland, Renfrewshire Council), specifically with children experiencing poverty (NHS Health Scotland, Scottish Youth Parliament).
• Ensuring that young people with experience of poverty are included in the Commission’s membership (Scottish Youth Parliament).
• Ensuring that delivery plans are developed in partnership with local as well as national partners, that recommendations from local activity feed into national policy and practice and that local good practice is shared across Scotland (Renfrewshire Council).
• Collecting evidence and reporting on progress towards meeting child poverty targets, scrutiny of delivery plans and progress reports and offering advice to Scottish Ministers (Inclusion Scotland).
• Bringing together Ministers from different departments; and reporting directly to the First Minister (RCPCH).
• As an independent Commission, taking responsibility for assessing all legislation for its impact on child poverty (Shelter Scotland).
• When targets are not met, conducting an independent review and making clear recommendations for action (Shelter Scotland).

10. Other relevant issues

As part of the call for views, respondents were invited to comment on other issues not previously covered. An issue raised by a number of respondents was the importance of situating action on child poverty within the wider policy context. For example, NHS Greater Glasgow and Clyde highlighted that tackling child poverty requires action across a range of policy areas, including health and social security, while Dr Treanor noted that achieving the targets requires “radical changes to legislation, policy in many areas [and] structural changes (e.g. [to the] labour market”). Shelter Scotland pointed to housing insecurity as an important factor in experiences of child poverty, noting that the “interconnections between homelessness, high housing costs and welfare changes all need to be addressed together”.

CAS made a specific recommendation that the Scottish Government works with the UK Government to achieve the child poverty targets:

“Eradicating child poverty by 2030 will require a sustained and focussed programme of activities across a number of areas, including reserved matters. Whilst a number of matters related to addressing child poverty – such as education, health and public transport are within the remit of the Scottish Parliament – other areas directly related to increasing family income, such as the National Minimum Wage, most ‘safety net’ social security benefits, and areas of taxation are reserved to the UK Parliament.”

Many of the voluntary sector respondents drew attention to the relationship between social security and child poverty. Submissions from ECP members, among others, asked that the Scottish Government use the newly devolved social security powers to tackle child poverty, with some specifically asking that the Scottish Government consider a top-up to child benefit either as a policy measure or through a specific provision in the Bill. As CPAG said:

“…the legislation should include an initial commitment to use new social security powers to top-up child benefit by £5 a week per child (a policy modelling suggests would reduce child poverty by up to 14% - lifting around 30,000 children out of poverty).”

Several respondents reiterated the need to ensure that account is taken of the different experiences of poverty affecting specific groups. For example, Inclusion Scotland called for recognition of the additional costs that can be associated with disability. Scottish Refugee
Council further asked that recognition be given to the barriers to exiting poverty that are experienced by children in asylum seeking and refugee families.

NHS Greater Glasgow and Clyde suggested that any guidance issued by the Scottish Government to public bodies working at national, regional or local level should recognise that poverty is experienced differently by different groups. It noted that poverty is not only gendered, but there are specific groups (of children and adults) that are at particular risk and need intensive or additional support / resources in order to exit poverty. NHS Health Scotland suggested lone parents as an example of a group in this category, arguing that it is “important to consider how different population groups are affected by child poverty and that appropriate action tailored to their needs is considered”.

11. Financial Memorandum

There were 12 submissions received by the Finance and Constitution Committee in response to its call for views on the FM. The responses acknowledged that the FM makes reference to an estimated cost for production of annual child poverty action reports by local authorities and regional health boards. However, many of the respondents pointed out that this additional reporting is being asked for when budgets are already stretched, so placing an additional burden on local service providers (e.g. South Lanarkshire Council, West Lothian Council).

A number of respondents also pointed out that the costs estimated in the FM do not take account of the resources involved in partnership working; and it is often partnerships (involving more than just local authorities and health boards) that are involved in local level activity to tackle child poverty. East Ayrshire Council, for example, pointed out that the activity of CPPs is not factored into cost estimates.

More importantly perhaps, the respondents all highlighted that the real costs come with the need for various local partners to pursue new and revised activity to work toward meeting the statutory child poverty targets. Dumfries & Galloway Council, for example, noted that, in the context of reduced budgets, supporting vulnerable children is increasingly difficult; with new approaches to meeting the sometimes complex needs of children in poverty requiring significant resource investment.

Suzi Macpherson and Jon Shaw
SPICe Research
13 April 2017

Note: Committee briefing papers are provided by SPICe for the use of Scottish Parliament committees and clerking staff. They provide focused information or respond to specific questions or areas of interest to committees and are not intended to offer comprehensive coverage of a subject area.

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