

# Tackling Child Poverty and Improving Life Chances: Consulting on a New Approach

## Consultation Response Form

The closing date for this consultation is: 15  
February 2011

Your comments must reach us by that date.

**THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online response facility available on the Department for Education e-consultation website: (<http://www.education.gov.uk/consultations>).**

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

**Please tick if you want us to keep your response confidential.**

Reason for confidentiality:

Name	Sarah Burton
Organisation (if applicable)	Children in Scotland
Address:	Princes House, 5 Shandwick Place, Edinburgh, EH2 4RG

If your enquiry is related to the policy content of the consultation you can telephone: 0370 000 2288 or email:

[Childpoverty.strategy@childpovertyunit.gsi.gov.uk](mailto:Childpoverty.strategy@childpovertyunit.gsi.gov.uk)

If you have a query relating to the consultation process you can contact the Consultation Unit by telephone: 0370 000 2288 or e-mail: [consultation.unit@education.gsi.gov.uk](mailto:consultation.unit@education.gsi.gov.uk)

Please select ONE the box which best describes you as a respondent

<input type="checkbox"/> Local authorities and organisations of local authorities	<input type="checkbox"/> Families and organisations representing families and children	<input checked="" type="checkbox"/> Voluntary and community sector organisations
<input type="checkbox"/> Research bodies and academics	<input type="checkbox"/> Public bodies and named partners in the Child Poverty Act	<input type="checkbox"/> Employers and business organisations
<input type="checkbox"/> Practitioners working with children, young people and families	<input type="checkbox"/> Central Government	<input type="checkbox"/> Social Enterprises
<input type="checkbox"/> Other		

Please Specify:

Children in Scotland is the national umbrella agency for organisations and professionals working with and for children, young people and their families in Scotland.

It exists to identify and promote the interests of children and their families and to ensure that policies and services and other provisions are of the highest quality and are able to meet the needs of a diverse society. Children in Scotland represents more that 400 members, including 90% of Scottish local authorities, all major voluntary, statutory and private children's agencies, professional organisations, as well as many other smaller community groups and children's services.

It is linked with similar agencies in other parts of the UK and Europe – the sister organisation to the National Children's Bureau, Children in Wales and Children in Northern Ireland.

## **Building our Approach**

1 What do you think are the key points from the [Frank Field Review](#) which the Government needs to incorporate into the child poverty strategy?

Comments:

The Frank Field Review's primary purpose was to consider the supports that would be needed to ensure, as far as possible, that children born into material poverty did not themselves become poor as adults. In this respect, it was concerned more with achieving positive change in the longer-term rather than short-term amelioration of material and financial deprivation. In Scotland, the areas considered by the Review are in general devolved – see: the Scottish Government's Early Years Framework (2008)

<http://www.scotland.gov.uk/Topics/People/Young-People/Early-Years-and-Family> covered much of the same territory.

Like the Field Review, the Framework highlights the importance of support in the early years in “breaking cycles of poverty, inequality and poor outcomes” and the centrality of effective and empathetic parenting in contributing to achieving this objective. It also emphasises the value of “using the strength of universal services to deliver prevention and early intervention”. While we concur with many of the points made in the Review, and the value and validity of much of the supporting research, we are confining our response to issues that are either not devolved, or where the interface between devolved and reserved matters makes the delivery of a coherent approach more difficult.

Children in Scotland believes that the provision of universal, affordable, accessible and integrated services for the early years, including early childhood education and care and effective promotion of good parenting, is among the most important elements of any strategy aimed at reducing child poverty. We recently led a European research programme ([www.childrenscotland.org.uk/wfi](http://www.childrenscotland.org.uk/wfi)) that examined how such services can have a positive impact on child poverty and social inclusion. It was clear that, in countries where such universal, integrated support was provided, child poverty was far less prevalent. In addition, children whose family income placed them in the poorest cohort within their country were far less likely to become poor adults than is the case in Scotland or the UK as a whole.

It is important to note, however, that funding for childcare (i.e. day care for young children and after school care) across the UK is determined by Westminster and is linked to parents being in employment (i.e. the childcare element of the working tax credit and employment vouchers). This money goes directly to parents in work. It is funding that is in response to demand, and does not contribute to creating a sustainable supply of childcare. This means that

while early years childcare and education is ostensibly a reserved matter, the Scottish Government's authority and impact is limited.

We recommend that the UK Government rethink its financial support for childcare and consider ways to direct money through the Scottish Government, rather than through employers and benefits. This is important because public investment in the supply of affordable, good quality childcare, even in a mixed economy, is central to its stability, its quality and therefore its impact on children's well-being, social mobility and life chances.

Numerous UK family studies find that affordable, accessible childcare would make a huge difference to parents' ability to return to paid work of some kind. Reducing the cost of childcare by offering subsidised care for those in low pay would make a huge difference to the number of children in poverty. It also lies at the heart of the goal of 'making work pay' for most families.

This is particularly important as research continues to find that many working families experience poverty. *In Scotland, more than half of all poor children live in a household where at least one adult already is in employment.* Poverty strategy needs to take on board a more detailed understanding of Early Childhood Education and Care (ECEC) that is not focused purely on childcare to enable parental employment, but offers services that bring together the traditionally divided concepts of childcare and education with the wider contribution that such services can make to children's general well-being, emotional and social development and lifelong learning. Services that are staffed by well educated and properly supported professionals and that form part of their community can play a major role. These services are not only preventative over the long term but can also have a short and immediate term positive impact on communities.

A strong investment in the supply-side of childcare also has an impact on equality and inclusion. The European Commission report 'Early childhood education and care: key lessons for policy makers' (<http://www.nesse.fr/nesse/activities/reports/ecec-report-pdf>) provides a coherent analysis of the importance of universal services and of their demonstrated positive effect for children, families and society.

2 What are your thoughts on the best way to incorporate early intervention into the child poverty strategy? (Note: We expect that the Graham Allen Review's interim report will be published before our consultation closes on the 15th February 2011. Respondents are welcome to include any reflections on the report in their responses).

Comments:

Again, we would stress the importance of considering the impact of UK-wide policy on Scotland – and especially, how it conflicts with and hinders full control over ostensibly reserved issues. There appears to be a worrying lack of understanding over this issue, as exemplified by point 7 in the full list of recommendations. This refers to a recommendation for the UK, which in fact does not concern Scotland.

There should be a full overview of the different ways that the education and care of young children is split between different government departments – with an eye toward eliminating this counterproductive distinction between them.

families into debt. Targeting services towards those most at risk of poverty is frequently advocated – and the current economic climate has reinforced this inclination. But, as the *OECD Starting Strong 11* report pointed out (echoed by Penn in her later report for the European Commission (referenced above)), ‘targeted programmes segregate, may stigmatise and generally fail to provide for many of the children eligible for special programmes’. This point is made strongly in the Communication from the European Commission on Early Childhood Education and Care which notes that “there is clear evidence that universal access to quality ECEC is more beneficial than interventions targeted exclusively at vulnerable groups”. Proportionate and appropriate support to those who need extra help should be provided within the context of good quality services for all.

### **The Child Poverty Act 2010**

3 Do you agree with our working definition of socio-economic disadvantage?  
(paragraph 4.2 and 4.3)

Yes

No

Not Sure

Comments:

system must take account of these existing data systems.

4 Are these the right areas for the child poverty strategy to cover?  
(paragraph 4.4)

Yes

No

Not Sure

Comments:

The “Foundation Years’ proposal would not apply in Scotland, unless the Scottish Government independently decided to take such an approach. There are various policies, strategies and laws in Scotland already intended to promote better service integration – e.g. the Local Government in Scotland Act (2003), which introduced a legal duty of cross-agency partnership planning.

We strongly support removing barriers to work and enabling families to achieve financial independence. As we have said above, we believe the availability of accessible affordable childcare would be a key contribution to achieving these objectives.

Financial support is important. Again, both making work pay and supporting the most vulnerable could be positively affected by reducing the cost to individual families and expanding the availability of good early years care and education.

While we strongly believe in devolution of power and community participation, we would like to be reassured that this would not result in the role of publicly provided services being in any way diminished, nor entitlements in any way compromised. We have articulated above the tensions inherent in the separation of key areas of responsibility and urge the Government to consider how its policies limit the scope of devolved authority in Scotland.

### **Reviewing the role of the Child Poverty Commission**

5 Do you agree that the role and the remit of the Child Poverty Commission should be broadened to reflect the new approach?

Yes No Not Sure

Comments:

The role and remit of the Commission, once established, should reflect the wider focus of the child poverty strategy.

### **What is important in determining children's life chances?**

6 What do you think makes the most difference to the life chances of children?

Comments:

There is a substantial body of research that unambiguously concludes that development in the period from conception to 3 is the most important factor in later outcomes. Of course good parenting, as Frank Field rightly points out, is vital to children developing well at this critical stage. While the right kinds of intervention – good pre-conception and ante-natal health advice, supporting the development of attachment, attunement and empathy, encouraging learning and communication, promoting healthy lifestyle choices, improving safety, consistency and stability – will be of great benefit in ensuring that far more children do not fall behind at such an early stage in life, this should be a complement to, not a substitute for, tackling financial poverty and material deprivation.

While material poverty *per se* may not be the most powerful determinant of later outcomes, it almost invariably co-exists with other pertinent risk factors. Bringing up children well in circumstances of material hardship, unpredictable and insecure finances, debt and deprivation, is challenging and stressful to say the least. Add to this the fact that many of these families lack the knowledge and experience to give children the best start in life. Both provision of effective support/services and a reasonable minimum income are essential to the long-term eradication of poverty and the present well-being of children.

Key elements, therefore, in improving the life chances of children therefore are

- Access to fully integrated universal non stigmatising services for children which support early learning and social and emotional development whilst also supporting parents in paid employment and education.
- Good parental, particularly maternal, health before, and at the time, of conception
- A strong new emphasis on pre-conception health care and counselling for women of childbearing age – and universal parental preparation and support for men and women.
- Healthy lifestyle choices during pregnancy, including avoiding the known long-term harm caused by tobacco and alcohol
- Good early nutrition, health care and hygiene, including encouragement of breast-feeding
- Early attachment and warm, responsive parenting – that is, the presence of at least one caring competent adult consistently in a child's daily life
- Stimulation and diversity – using community facilities and natural resources
- Security, stability and consistency within households – including greater support for grandparents and other kinship carers
- A level of income that allows families to meet children's needs effectively and minimises the stress and distress experienced by many poor families.

### **Emerging proposals for radical reforms to the system**

7 Are there additional measures, compatible with our fiscal approach, which could help us combat poverty and improve life chances?

Yes

No

Not Sure

Comments:

As we have said above, we do not believe the tax credit approach to childcare funding is the best way of ensuring reliable supply of good quality childcare. Nonetheless, while the present system persists, we would urge that they are increased, or at the very least, not reduced. As we also stated elsewhere in this response, protection or expansion of particular service areas would be valuable – underpinning this with guidance, regulation or statute would help.

8 What further steps can be taken to help local authorities to reduce poverty and improve life chances?

Comments:

We believe that protection and indeed expansion of effective support as described above will not only address current child poverty and future life chances, but will generate significant savings to the public purse in the medium to long term, as well as improving the quality of life for everyone in our communities.

9 How can the voluntary, community and private sectors contribute most effectively to local approaches to tackling child poverty and improving life chances?

Comments:

We believe all sectors of provision have an important role to play. The impact of a service is more important than the provider. Choices at all levels should be based on knowledge of effectiveness. As long as the government guarantees that affordable, accessible, good quality childcare will become a feasible choice for all parents and their children (including both those under the age of three and those of school age) – with a cap on parental out-of-pocket financial contributions – then there are real advantages to having a mixed economy of providers. Other European nations have achieved this goal; so can the UK, including Scotland.

10 Please use this space for any other comments you would like to make.

Comments:

11 Please let us have your views on responding to this consultation (e.g. the number and type of questions, was it easy to find, understand, complete etc.)

Comments:

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

**Please acknowledge this reply**

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

**X** Yes

No

All DfE public consultations are required to conform to the following criteria within the Government Code of Practice on Consultation:

Criterion 1: Formal consultation should take place at a stage when there is scope to influence the policy outcome.

Criterion 2: Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.

Criterion 3: Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.

Criterion 4: Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.

Criterion 5: Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.

Criterion 6: Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.

Criterion 7: Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

If you have any comments on how DfE consultations are conducted, please contact Donna Harrison, DfE Consultation Co-ordinator, tel: 01928 738212 / email: [donna.harrison@education.gsi.gov.uk](mailto:donna.harrison@education.gsi.gov.uk)

**Thank you for taking time to respond to this consultation.**

Completed questionnaires and other responses should be sent to the address shown below by 15 February 2011

Send by post to: Consultation Unit, Floor GB, Castle View House, East Lane, Runcorn, Cheshire WA7 2GJ.

Send by e-mail to: [Childpoverty.strategy@childpovertyunit.gsi.gov.uk](mailto:Childpoverty.strategy@childpovertyunit.gsi.gov.uk)