

## **Child Poverty Bill Scotland**

### **Response from Children in Scotland to the Scottish Government's consultation paper**

**September 2016**

#### **Introduction**

Children in Scotland is the collective voice for children, young people and families in Scotland as well as the organisations and businesses that have a significant impact on children's lives throughout the country. It is a membership organisation, comprised of more than 550 representatives from the voluntary, public and private sectors.

We aim to identify and promote the interests of children and their families, influencing the development of policy and services in order to ensure that they are of the best possible quality, capable of meeting the needs of children and young people living in Scotland.

We are members of the End Child Poverty (ECP) coalition, made up of more than 100 organisations from civic society including children's charities, child welfare organisations, social justice groups, faith groups, trade unions and others, united in our vision of a UK free of child poverty.

As signatories to the End Child Poverty response, we fully endorse the proposals contained therein, with this response designed to highlight additional information largely gathered from Children in Scotland's project work. It is also informed by Enquire, Scotland's advice service for additional support for learning, managed by Children in Scotland. Enquire provides expert advice to parents, professionals and children and young people themselves on all aspects of additional support for learning in education. We are pleased that this response also draws on the knowledge and views of parents through the National Parent Forum of Scotland, which works in partnership with national and local government and other organisations

involved in education and well being issues to represent parents in pursuit of our aim to help every pupil maximise his/her potential.

### **1. Do you agree with the Scottish Government including in statute an ambition to eradicate child poverty?**

Currently 1 in 5 children live in poverty, and according to estimates from the IFS, an additional 50,000 children in Scotland will be living in poverty by 2020.<sup>1</sup> There is therefore undoubtedly a need to take concerted action to eradicate child poverty, and we welcome the Scottish Government's action to legislate to eradicate child poverty.

Under Article 12 of the UNCRC<sup>2</sup>, children and young people have the right to participate in decisions which affect them, and therefore the views of children and young people must actively be sought at every stage of the design and delivery of the legislation and related policies. This includes ensuring that children are given support to do so, and that all children, including children with additional support needs, are given meaningful opportunities to scrutinise the effectiveness of measures taken in their area and nationally. This is of particular importance when considering that 4 in every 10 disabled children in the UK are living in poverty<sup>3</sup>, at double the national average. This research also indicates that households in the UK affected by disability are more likely to not be working, or working fewer hours and in households affected by disability who are working they are more likely to be earning less.<sup>4</sup> Parents of disabled children report facing particular barriers to employment including inflexible employers, and especially, lack of affordable and appropriate childcare.<sup>5</sup> The Enquire helpline hears from parents of children with additional support needs who are facing these challenges in finding appropriate childcare for their children.<sup>6</sup>

Therefore as part of tackling child poverty we highlight that, in line with the 2015 Commission for Childcare Reform report, that childcare provision needs to be not only flexible, affordable but also, key for parents of children with additional support needs, suitable to meet the needs of their child.

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<sup>1</sup> <https://www.ifs.org.uk/bns/bn144.pdf>

<sup>2</sup> <http://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

<sup>3</sup> The Children's Society (2011) 4 in Every 10 - Disabled Children Living in Poverty Report.

<sup>4</sup> The Children's Society (2011) 4 in Every 10 - Disabled Children Living in Poverty Report.

<sup>5</sup> About Families (2012) Parenting on a Low Income, Edinburgh: Centre for Research on Families and Relationships

<sup>6</sup> Childcare/ early years was raised in 64 calls in the last 12 months

Enquire also hears from families of children with additional support needs who are out of school<sup>7</sup> and in some of these calls we hear about the impact this has on the families' ability to work. This illustrates the additional financial pressures and barriers parents of children with additional support needs may be experiencing. Enquire recommends the specific needs of vulnerable groups like children with additional support needs should be highlighted and considered within the Child Poverty Bill. Enquire would like to highlight the importance of adequate and efficient additional support for learning, to support young people with additional support needs to remain in education, to enable families to maintain their income and tackle child poverty.

We would also like to highlight that the National Parent Forum of Scotland is encouraged by the Scottish Government focus on reducing the attainment gap and achieving equity and excellence in education. The new duties introduced by the Education (Scotland) Act 2016 to tackle inequalities of educational outcome experienced by pupils as a result of socio-economic disadvantage are welcome, but we urge that there must be a careful evaluation of the Local Authority reporting on progress towards addressing socio-economic equality. .

## **2. What are your views on making income targets statutory?**

Yes, we agree income targets should be statutory. For a statutory ambition or duty to eradicate child poverty to be meaningful there must be a clear method for measuring progress, as discussed in the End Child Poverty response.

## **3. How do you think the role of the Ministerial Advisory Group on Child Poverty can be developed to ensure that they play a key role in developing the legislation?**

We believe the Scottish Government should continue to draw on the expertise of the Ministerial Advisory Group (MAG) which should be kept well informed and given requisite time and information to meaningfully inform the development of legislation as well as subsequent regulation and guidance.

Fundamentally, it is crucial that children and young people and families, particularly those who are living or have lived in poverty, are involved in developing the legislation, as well as its implementation and scrutinising the effectiveness of policy and practice. We would therefore strongly urge that the Ministerial Advisory Group is developed with a view to ensuring that the voices and experiences of children, young people and families are at the heart of decision making, recognising the expertise these individuals bring.

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<sup>7</sup> In the last year the Enquire Helpline heard from 168 parents of children who were out of school either through part-time placements, informal exclusion, ill-health, school-refusal or concerns about the suitability of a placement.

The National Parent Forum of Scotland would emphasise the wealth of evidence pointing to the value of engaging with parents and believe that the MAG could help develop this further. The Forum is currently conducting a wide reaching review of the Scottish Schools (Parental Involvement) Act 2006.<sup>8</sup>

Notable findings from the completed telephone survey of 502 parents are:

- that those living in deprived areas are less likely to feed back to the school through formal means (5% of parents living in the most deprived areas would feed back this way compared with 20%% in the least deprived areas) ;
- those with a lower socioeconomic status are less likely to be interested in joining the Parent Council (52% of AB parents would be interested in joining, compared with 34% of DE parents);
- those with a lower socioeconomic status are less likely to know what the Parent Council does (e.g. 32% of DE parents don't know if the Parent Council asks parent's views about what the children in the school are learning, compared with 17% of AB parents).

Preliminary findings from the additional parent survey call for evidence would suggest that confidence, capacity and accessibility are barriers to parental involvement. We hope that the MAG could work on projects and policies to break down these barriers. For example, in terms of accessibility we would like to see schools have dedicated funds available to pay for meals, transport, childcare, specialist tutors, craft materials and support homework clubs etc. to make it entirely accessible to the whole parent forum.

#### **4. How can links between the national strategy and local implementation be improved? What could local partners do to contribute to meeting these national goals? This might include reporting and sharing best practice or developing new strategic approaches.**

We believe there is a need for stronger links between national and local implementation than currently exist under the Child Poverty Strategy for Scotland, and that the current policy landscape provides clear opportunities to embed these links.

We know that there are strong links between the experience of child poverty and poor mental health. One study shows that children living in low-income households are nearly three times as likely to suffer mental health problems

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<sup>8</sup> Research to inform the Review of the Impacts of the Parental Involvement (Scotland) Act 2006, Ipsos MORI Scotland, July/August 2016

than their more affluent peers.<sup>9</sup>

Further, the link between children and young people's mental health and that of their family is evident, and the effect of sanctions on families can be incredibly damaging. With the first 10 year mental health strategy currently being created, along with new social security powers and the new Child Poverty Bill, it is vital that these streams of work do not operate in separation but that they support and link to each other.

This can be achieved in part by more clarity within the proposed legislation and subsequent delivery plans as to the role of local authorities and their community planning partners (and other key partners such as the DWP and the private sector) in reducing child poverty. While much is already being done locally to address child poverty, there is evidence of wide variation in terms of political commitment and the quality of existing strategic approaches to poverty reduction<sup>10</sup>.

In order to ensure greater consistency and accountability across all local authority areas ECP members in Scotland believe that the legislation place a duty on local authorities and/or their community planning partners to take a strategic approach to reducing child poverty in their area. Local authorities and their community planning partners have control over aspects of policy that can have a significant impact on levels of poverty including employability, education, childcare and the delivery of certain social security benefits. A requirement to demonstrate that a strategic approach to reducing child poverty through existing planning and reporting mechanisms such as Children's Services Plans Local Outcome Improvement Plans and Locality Plans – would help ensure child poverty was considered at the highest level within relevant organisations. It would also help to ensure those working on poverty reduction do not do so in a silo as child poverty will be mainstreamed and relevant to all teams and departments.

Fundamentally, wider commitments made by the Government through policies initiatives such as Equally Well, Fairer Scotland, the new mental health strategy, commitment to the UNCRC and closing the educational attainment gap simply cannot be realised until child poverty has been reduced dramatically in Scotland.

**5. What are your views on the income-based measures of poverty proposed for Scottish child poverty targets? For example, are there any additional income-based measures you think we should**

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<sup>9</sup> [www.jrf.org.uk/system/files/2301-child-poverty-costs.pdf](http://www.jrf.org.uk/system/files/2301-child-poverty-costs.pdf) Joseph Rowntree Foundation, The cost of child poverty for individuals and society, 2008

<sup>10</sup> <https://www.savethechildren.org.uk/sites/default/files/images/Local-action-tackle-poverty-Scotland.pdf>

**also use (and if so, why)?**

**Are there any alternative approaches to measuring income - for example, as used in other countries - that you think could apply in Scotland?**

We would direct you to the ECP response, which highlights that income based targets are preferred. We further welcome the focus on outcomes, and believe that a two-pronged approach to tackling child poverty is required. As previously stated, this should be done in partnership with children, young people and families, and would recommend that outcomes are designed and periodically reviewed in partnership with these individuals, in order to make sure they are meaningful and have a genuine impact in the lives of families living in poverty.

**6. What are your views on the Scottish Government's proposals for the levels of child poverty that the targets will be set at?**

We agree that the level at which the 2030 targets are set seems reasonable. International comparisons suggest that the headline 10% target level is both realistic and achievable.

While we recognise the need to set an attainable target to reduce poverty, it should become unacceptable for any child's health, wellbeing and future life chances to be blighted by poverty. In the drive to meet the targets the Scottish Government and its partners must not be detracted from the broader ambition of preventing future generations from growing up in poverty. In particular, we believe that measures should take account of people's changing circumstances, such as people living with long term conditions, or unpaid carers, whose needs or responsibilities may fluctuate and as such affect their ability to work. It is important that this legislation, as well as any new social security system, recognises and responds to people's circumstances and that offers support where it is needed. In order to do this, a clear and accurate picture of people's circumstances is vital.

**7. What are your views on the Scottish Government's proposal to set targets on an after housing costs basis? For example, are there any disadvantages to this approach that we have not already considered?**

As per the ECP response, we welcome the Scottish Government's proposal that the relative income target should be calculated after housing costs, but that gathering information on rates of poverty both before and after housing costs also allows for the impact of housing policy on poverty rates to be better understood.

Further, we would highlight that information on what support is available on housing should be made clear to young people. Beyond4Walls<sup>11</sup>, a community peer research project, involved a group of young people aged 14-21 from across Glasgow coming together to discuss and explore housing, economic and community issues in Scotland. One of the key findings from the project was that most respondents involved did not know that there is support available around welfare and budgeting advice, and called for further education on these within schools and communities.<sup>12</sup>

### **8. What are your views on the Scottish Government's proposal to set targets that are expected to be achieved by 2030?**

We are extremely disappointed that the UK level 2020 targets contained in the Child Poverty Act 2010 have been abandoned by the UK Government. We accept, however, that it would be unrealistic for the Scottish Government to meet the income targets described by 2020, however we do agree that significant progress towards this can and should be taken.

As discussed in the ECP response, in addition to the 2030 targets we believe 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. Again, we would highlight the importance of children, young people and families being central to this process.

### **9. What are your views on the proposal that Scottish Ministers will be required by the Bill to produce a Child Poverty Delivery Plan every five years, and to report on this Plan annually?**

As expressed in the ECP response, we welcome the proposal of including a duty to produce delivery plans every 5 years in the legislation.

We believe that in order to achieve its ambitions, the delivery plan must be adequately resourced, and attribute clear actions, timescales and ensure accountability.

It is currently unclear what action will be taken if targets are not met. We would hope that additional support would be provided to local authorities where needed, and that best practice will be shared throughout the country.

### **10. Do you have any suggestions for how the measurement framework could usefully be improved? For example, are there any influencing factors that are not covered by the measurement framework? Or are there any additional indicators that could be added?**

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<sup>11</sup> More information available at

<http://www.childreninscotland.org.uk/project/beyond4walls>

<sup>12</sup> [http://www.childreninscotland.org.uk/sites/default/files/Beyond4Walls\\_Report.pdf](http://www.childreninscotland.org.uk/sites/default/files/Beyond4Walls_Report.pdf)

As highlighted in the ECP response, we are keen to ensure that the contents of any renewed measurement framework are linked more closely with the four income based targets.

Evidence gathering as part of the measurement framework should also be qualitative in nature and draw on the experience of those living in poverty. It is important that the full experiences of families are recognised, taking a holistic view of people's lives. For example, Children in Scotland's 'Food, Families, Futures' project<sup>13</sup> looked at addressing food poverty and its links with wellbeing, learning and attainment. The programme initially focussed on two communities with significant levels of child poverty – Ibrox and Dalmarnock in Glasgow. In Glasgow 38.8% of primary school pupils, and 29.8% of secondary pupils, are currently in receipt of free school meals (FSM), according to the Cost of School Holidays Literature Review (2015). Ibrox and Dalmarnock have two of the highest rates of FSM entitlement in Scotland. The oversubscribed summer activities programmes were hugely successful, with children and families reporting that these made a positive impact in their health and wellbeing, and were enjoyed by children and parents alike.<sup>14</sup> Innovative projects such as this which respond to the needs of communities in creative ways must be championed and encouraged, which develop relationships within communities, offer fun activities for families and provide support for families who face additional financial pressures during school holidays.

If Scotland is serious about delivering services in partnership with service users, in line with the Christie Commission report and the ambition of the Community Empowerment Act, the voices of children and families with lived experiences of poverty, must also inform changes to the child poverty measurement framework. Across a range of measurements in the existing framework, for example satisfaction with local schools, the stigma of poverty or lack of social and cultural capital may prevent families living in poverty from asserting their rights. Genuine participation of families experiencing or who have experienced poverty will help ensure that measurements reflect and track real change in the experience and impact of child poverty in Scotland over time.

## **11. Do you have any additional views on a Child Poverty Bill for Scotland?**

As highlighted above, we believe that consideration needs to be given to what can be done with new powers around social security to ensure that the 2030 target is met.

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<sup>13</sup> More information available at [www.childreninscotland.org.uk/project/food-families-futures](http://www.childreninscotland.org.uk/project/food-families-futures)

<sup>14</sup> See <https://vimeo.com/178001930>

We would also recommend that the Scottish Government's duty to produce Children's Wellbeing and Rights Impact Assessments is used to consider and address child poverty.