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# Consultation on a Child Poverty Bill for Scotland: Analysis of Responses



EQUALITY, POVERTY AND SOCIAL SECURITY



## Contents

<b>Executive summary</b> .....	<b>3</b>
<b>1. Background and context</b> .....	<b>7</b>
1.1. Background .....	7
1.2. The consultation .....	7
1.3. Submissions and responses .....	8
1.4. Analysis of the data and presentation of the information .....	9
<b>2. An ambition to eradicate child poverty</b> .....	<b>10</b>
2.1. Broad support for including an ambition in statute .....	10
2.2. Need to consider the wider policy context of child poverty .....	11
2.3. Legislation alone will not eradicate poverty.....	12
<b>3. The income-based targets</b> .....	<b>12</b>
3.1. Views on making income targets statutory.....	12
3.2. Views on the income-based measures .....	14
3.3. Views on setting the target levels.....	16
3.4. Views on setting targets on an After Housing Costs (AHC) basis.....	18
3.5. Views on the date for achievement of the targets .....	19
<b>4. The role of the Ministerial Advisory Group on Child Poverty</b> .....	<b>20</b>
4.1. Advising Scottish Government and providing oversight.....	20
4.2. Making links and sharing good practice .....	21
4.3. Profile and representation .....	22
<b>5. Links between the national strategy and local implementation</b> .....	<b>23</b>
5.1. Clarifying roles and responsibilities.....	24
5.2. Local duties, targets and reporting.....	24
5.3. Support for sharing learning and disseminating best practice .....	25
<b>6. The Child Poverty Delivery Plan</b> .....	<b>26</b>
<b>7. The Child Poverty Measurement Framework</b> .....	<b>28</b>
7.1. Support for the current framework.....	28
7.2. Views on the current indicators .....	29
7.3. Moving forward: capturing different experiences of poverty.....	31
7.4. Moving forward: suggestions for indicators to amend/add .....	31
<b>8. Additional comments</b> .....	<b>36</b>
<b>Annex 1: Consultation questions</b> .....	<b>38</b>
<b>Annex 2: Respondents</b> .....	<b>39</b>

# Executive summary

This report presents the findings of an analysis of responses to the Scottish Government's consultation on a Child Poverty Bill for Scotland. The consultation ran from the 8<sup>th</sup> August to the 30<sup>th</sup> September, and explored respondents' views on the Scottish Government's proposals for a Child Poverty Bill, including:

- Enshrining in legislation an ambition to eradicate child poverty
- Reinstating statutory income-based targets to reduce the number of children living in poverty
- Placing a duty on Scottish Ministers to develop a Child Poverty Delivery Plan, and to report on annually on their progress towards delivering that plan.

A total of 116 responses were received. Thirty of these (26%) were from individuals, and the remaining 86 (74%) from stakeholder organisations.

## An ambition to eradicate child poverty

Of the respondents who answered Question 1, most (94%) agreed with the Scottish Government including in statute an ambition to eradicate child poverty. A range of reasons for this support were outlined, including that the ambition would be a 'clear and public expression' of the Scottish Government's commitment; provide focus or a 'clear direction of travel'; place child poverty 'high on the agenda'; and act as a driver of change. The need to consider Child Poverty legislation in the wider context of other policy and legislative developments, and to make sure it is aligned with existing structures, was highlighted.

Many also made the point that 'legislation alone won't eradicate poverty', underlining that the ambition must be backed up by 'actions', 'policies' and/or 'clear strategies'. Some reservations were noted, for example: the language for the proposed Bill should be stronger than 'an ambition', Scottish Government does not have all the relevant levers to address income inequality, and whether sufficient funding would be available to achieve the targets.

## The income-based targets

The majority of respondents also agreed with the proposal to make the income targets statutory. Reasons given for agreement included that income is central to the experience of poverty, and that statutory targets would be helpful to focus efforts, are crucial in order to measure progress, and are in line with the United Nations Convention on the Rights of the Child (UNCRC). Nevertheless, several responses underlined that poverty is not about income alone, mentioning other causes and outcomes of poverty such as: inequality, lack of opportunity, the cost of living, good parenting, access to childcare, education, housing, worklessness, and health and well-being. Some local partners felt more clarity is required over who will be responsible for collecting the data and reporting on targets, as well as who the income targets would be statutory for.

The majority of respondents agreed with the proposed income-based measures of poverty. Reasons provided for agreement were that using the existing measures meant that they are 'robust', 'well known' and 'widely understood', 'comprehensive

and complementary' and allow comparison with past progress as well as international comparison. Additional aspects of poverty that several respondents thought were not sufficiently covered in the suggested measures focused on financial insecurity, depth/severity of poverty and taking into account the cost of living. A few respondents did not think that the persistent poverty targets were ambitious enough.

For the most part, there was agreement with the proposed levels for the targets to be set at. In general the proposed levels were seen as ambitious and challenging but realistic. In describing the levels as challenging, some respondents highlighted the background of UK welfare reforms, the Institute for Fiscal Studies (IFS) projections that poverty will rise by 2020, and the challenging economic climate. A few respondents, based on this context, noted concerns that there is a risk the targets will not be achieved. Others underlined that 'significant political and economic effort' or 'more radical actions' would be required to meet these targets. However, most thought it was right that the targets were challenging. A few respondents raised the issue of the acceptability of leaving 5% of children in poverty, questioning whether this met the goal of 'eradication' or underlining that these targets should be seen as the starting point in eradicating child poverty. Some respondents wanted more information on the evidence base used to determine the target levels.

Most respondents agreed with setting the targets on an After Housing Costs (AHC) basis, highlighting that "housing costs are a significant factor in poverty" and that measuring poverty AHC provides a better indication of the resources available to households. Several respondents underlined the importance of continuing to report on both Before Housing Costs (BHC) and AHC, noting that gathering information on both allows poverty to be better understood. A few respondents highlighted that the BHC measure allows national and international comparisons, which are important. A few respondents also suggested measuring poverty after other costs such as energy, transport and childcare.

Most respondents agreed that the 2030 date for the targets to be achieved by was appropriate suggesting that this date would be realistic, allow for long-term planning, and aligns with other action plans, particularly the Fairer Scotland Action Plan. A few noted disappointment that the Race Equality Framework for Scotland 2016-2030 was not mentioned specifically in the consultation document. A few suggested they would like to see evidence of why this date was chosen as appropriate. A minority of respondents felt that the 2030 date was not ambitious enough and the targets should be achieved in a shorter timeframe. Others drew attention to the children who would be growing up in poverty during this timeframe. Many underlined the need to set interim targets or milestones to maintain momentum, assess progress, and make sure we are "making a difference to families in poverty now".

### **The role of the Ministerial Advisory Group on Child Poverty**

A range of suggestions were made for developing the role of the Ministerial Advisory Group. Key areas where the Ministerial Advisory Group was seen as having a role were: in advising on priorities and action; making links across different sectors and levels; independent scrutiny and monitoring; and disseminating good

practice. Additionally, a few respondents felt that there should also be an independent body or commission established to provide oversight and scrutiny of the Scottish Government and its partners' progress towards the targets. Some respondents noted that there was a lack of information available about the role and activities of the Ministerial Advisory Group, and suggested that the role of the group should be higher profile and its visibility should be increased.

Several also thought that, with the changing legislative situation, the remit of the Ministerial Advisory Group and its representation should be revisited. A wide range of suggestions were made for representation on the Ministerial Advisory Group. In particular, many respondents stressed the importance of engaging with and including the voices of families and young people who have experience of living in poverty, and saw the Ministerial Advisory Group as having a role in ensuring their views are taken into account.

### **Links between the national strategy and local implementation**

In considering how links between the national strategy and local implementation could be improved, many respondents noted the importance of taking a strategic approach across stakeholders and of partnership working, and welcomed the Scottish Government's focus on this. Several respondents highlighted that it would be important to clarify roles and responsibilities for all partners. A need for clarity over expectations around whether local authorities would produce and report on local strategies was also identified. In general, those who discussed requiring local targets and reporting felt this would be appropriate, but that reporting ought to be proportionate and streamlined with existing duties, targets and reporting requirements so as not to place too great a burden on local authorities and Community Planning Partnerships. Some respondents suggested that a duty should be placed on local authorities and/or Community Planning Partnerships to reduce child poverty locally and report on progress. Roles identified for the Scottish Government included providing advice on prioritising different national initiatives and supporting local partners in identifying and sharing effective approaches to tackling poverty.

### **The Child Poverty Delivery Plan**

In general, respondents agreed that the proposal to produce a Child Poverty Delivery plan every five years and to report on the plan annually would be appropriate. Several responses highlighted that the five year plan was a 'realistic timeframe' and would provide a strategic focus and allow a focus on longer-term outcomes; but also that it is important to assess progress regularly to 'provide accountability and transparency', which the annual reporting would allow. A few mentioned that aligning the delivery plan with parliamentary terms would be helpful, but also that the first delivery plan should be produced as soon as practicable within the current parliament. Others highlighted the importance of being able to revise and review delivery plans at regular intervals in order to take account of changing circumstances.

Some respondents noted that thought would need to be given to what would be reported annually, as many indicators would not be expected to change in this timeframe. Several respondents underlined the importance of taking into account

local authority planning structures and reporting timescales, including Children's Services planning and Local Outcome Improvement Plans. A few suggested that the annual reports should be presented to Parliament and scrutinised by Committee. A minority of respondents questioned whether five-yearly delivery plans would be the most appropriate timeframe. Some individual respondents felt five years was too long. A few organisational responses suggested a four-yearly timeframe in order to allow three delivery plans to be produced within the timeframe. Others suggested a three-yearly timeframe so as to be consistent with other local reporting structures, such as Children's Planning cycles. The importance of adequately resourcing the delivery plan and being clear on actions and responsibilities was again highlighted by some in responses to this question.

### **The Child Poverty Measurement Framework**

A number of respondents stated their support for the child poverty measurement framework. Some respondents mentioned the importance of linking the framework with existing Scottish Government policies, as well as embedding children's rights through the United Nations Convention on the Rights of the Child. It was also felt that certain existing data sources, and sets of indicators could feed into the future development of the measurement framework.

Some respondents called for a greater emphasis on income and the 'Pockets' indicators. However, others suggested the framework contain fewer indicators and focus on indicators which are already incorporated within existing frameworks in order to reduce the burden of data collection. A recurring critique of the existing indicators was that the link to eradicating child poverty was not always clear. A preference for indicators linked to the four income-based targets was also expressed. Suggestions for amending specific indicators focussed on the 'Prospects' indicators on attachment, nutrition, apprenticeships and smoking. A number of respondents commented that those who share certain protected characteristics are more likely to experience poverty, and this should be reflected in the framework. Disaggregating data by equality characteristic where possible was suggested. The differing experience of poverty in rural compared to urban locations was also highlighted.

There were a number of suggestions for additional indicators under each of the three P's, 'Pockets', 'Prospects' and 'Places', with a number of respondents placing an emphasis on 'Pockets'. The most commonly suggested 'Pockets' indicators related to benefits, with indicators relating to parental employment, debt, childcare and the "poverty premium" also frequently suggested. For 'Prospects', a range of additional health indicators were suggested. Data relating to child protection and looked after children, educational attainment, and food poverty and household food insecurity were also mentioned. Indicators around fuel poverty were the most commonly suggested under 'Places', followed by access to, and satisfaction with hobbies/culture/sport/leisure and play facilities. Indicators around housing quality were also suggested.



# 1. Background and context

This report presents the findings of an analysis of responses to the Scottish Government's consultation on a Child Poverty Bill for Scotland.

## 1.1. Background

In July 2015, the UK Government announced their intention to repeal significant proportions of the Child Poverty Act 2010 via the Welfare Reform and Work Bill. They proposed to replace the four income-based targets with measures on worklessness and educational attainment; to remove the child poverty aspects of the Social Mobility and Child Poverty Commission's remit; and to rename the legislation the 'Life Chances Act'.

Scottish Ministers fundamentally disagreed with this approach; in particular, the removal of targets, and the use of alternative measures that do not take income into account. In the Scottish Government's view, this represents a shift towards characterising poverty as a lifestyle choice rather than addressing the social and economic drivers that cause people to fall into or remain in poverty.

The Scottish Government therefore requested an opt-out from the UK Government's approach and worked to bring forward amendments to the Bill repealing all parts of the 2010 Act that imposed any duty on Scottish Ministers, and sought legislative consent from the Scottish Parliament. The UK Government's Welfare Reform and Work Bill was passed with the requested amendments in March 2016, meaning that the Scottish Government is in a position to bring forward proposals for a Scottish approach to tackling and measuring child poverty.

The Scottish Government has proposed that the key purpose of the Child Poverty Bill will be to enshrine in legislation a Scottish Government ambition to eradicate child poverty. That ambition will be underpinned by the reinstatement of statutory income targets, against which our progress can be judged, and a robust 'Team Scotland' Delivery Plan.

## 1.2. The consultation

The consultation ran from 8<sup>th</sup> August 2016 until 30<sup>th</sup> September 2016 on the Citizen Space website. A consultation document was issued and this explored views on the Scottish Government's proposals for a Child Poverty Bill, including:

- Enshrining in legislation an ambition to eradicate child poverty
- Reinstating statutory income-based targets to reduce the number of children living in poverty
- Placing a duty on Scottish Ministers to develop a Child Poverty Delivery Plan, and to report on annually on their progress towards delivering that plan.

The consultation asked 11 questions. One of these questions asked respondents to express their agreement or disagreement with the proposal to include in statute an ambition to eradicate child poverty, while the remainder asked for general views on the other proposals. All of the questions provided an opportunity for respondents to give detailed information. A full list of the questions is provided at Annex 1.

An online response form was provided through Citizen Space on which respondents could record their answers. Respondent information was also gathered using this form.

### 1.3. Submissions and responses

A total of 116 responses were received. The types of respondent are set out in Table 1. Three quarters of responses were from organisations, with around a quarter of responses from third sector organisations. A full list of respondents (excluding individual responses and organisations who wished to remain anonymous) is provided at Annex 2.

Table 1: Respondents by category

Category	Number	Percentage
<b>Individuals</b>	<b>30</b>	<b>26%</b>
Third Sector organisations	31	27%
Public bodies	21	18%
Representative bodies, trade bodies or trade unions	9	8%
Local authorities	21	18%
Private sector organisations or trusts	1	1%
Academic stakeholders	3	3%
<b>Total organisations</b>	<b>86</b>	<b>74%</b>
<b>Total</b>	<b>116</b>	

The majority of respondents addressed the specific questions and followed the format of the response form, although not all of them addressed all of the questions. Two respondents answered only Question 10 (on the Measurement Framework). A total of six did not follow the form, and provided their response either at Question 11 or in a separate document.

Additionally, the Scottish Youth Parliament (SYP) consulted with young people on the topic of child poverty in Scotland, based on the proposals set out in the consultation document. The Scottish Youth Parliament staff team facilitated two small group discussions with groups made up of 15 young people between the ages of 14 and 25, with mixed experiences of poverty. The Scottish Youth Parliament response presented a thematic summary of these discussions. The young people's views are incorporated into the relevant sections of the analysis.



## 1.4. Analysis of the data and presentation of the information

The analysis of the data involved a number of stages, which were:

- Export of the responses in a spreadsheet from the Citizen Space website.
- Quantitative analysis (where appropriate).
- Preparation of a series of Word documents for the qualitative material, containing all responses to each question.
- Identification of the key themes and sub-themes for each question.
- Summary of the findings and preparation of the report.

The presentation of the information involves a small amount of quantitative material, although most of the detail is qualitative. The quantitative information includes:

- The number of respondents overall, and the number/proportions of different types of respondents (Table 1 above).
- The views expressed at the “yes/no” question (Question 1).

The additional comments made at each question (e.g. where respondents were asked to give reasons for their answer, or to provide more general views) provided a large amount of additional qualitative detail. It would be inappropriate to attempt to quantify these views for a number of reasons, including that:

- The report refers to the views of those people and organisations who responded to the consultation. This is not necessarily representative of all views on the consultation. As such, it is not possible to generalise from these findings.
- The nature of the exercise, small numbers and type of question did not lend themselves to quantitative analysis; hence the focus of the qualitative analysis was on the range and nature of views, rather than a “weighing” of responses.
- Some responses represented the views of a number of individuals or organisations.

Qualitative terms (e.g. “a few”; “several”; “many”; etc.) are used to present the detailed information, and the overall themes and range and depth of views are described. The full text of the responses can be viewed on the Scottish Government website.

The remainder of the report presents the findings of the consultation analysis, as follows.

- Section 2: An ambition to eradicate child poverty (Question 1)
- Section 3: The income-based targets (Questions 2, 5, 6, 7 and 8)
- Section 4: The role of the Ministerial Advisory Group on Child Poverty (Question 3)
- Section 5: Links between the national strategy and local implementation (Question 4)
- Section 6: The Child Poverty Delivery Plan (Question 9)
- Section 7: The Child Poverty Measurement Framework (Question 10)

## 2. An ambition to eradicate child poverty

### 2.1. Broad support for including an ambition in statute

**Question 1 asked:**

**Do you agree with the Scottish Government including in statute an ambition to eradicate child poverty?** (105 respondents answered this question)

Most respondents answered Question 1 (90%). Of these, almost all (101 respondents: 94%) agreed with the Scottish Government including in statute an ambition to eradicate child poverty. Only four respondents disagreed.

Respondents were given an opportunity to comment on their response to Question 1, and the majority (92 respondents) provided comments. Of the four respondents who disagreed with including the ambition in statute, two organisations noted that they supported the ambition, but one thought the consultation paper had not made the case for including it in statute and the other did not believe poverty could be completely eradicated.

Many of the respondents who agreed with including the ambition in statute, highlighted that they ‘support’, ‘welcome’ or ‘share’ the ambition in their comments.

“We both welcome and share the Scottish Government’s ambition to eradicate child poverty, and agree that by placing the proposed Child Poverty Bill in statute this can progress the aims of the Scottish Government to that end.” (Aberlour Child Care Trust)

“Save the Children very much welcomes the general principles of the Child Poverty Bill. We believe that giving legal force to the commitment to eradicate child poverty is a major opportunity to shape and drive policy to tackle poverty and thereby improve the quality of children’s childhood and their future life chances.” (Save the Children)

A range of reasons for this support were outlined. Several respondents felt that the ambition would be a ‘clear and public expression’ of the Scottish Government’s commitment; provide focus or a ‘clear direction of travel’; place child poverty ‘high on the agenda’; and generate commitment/act as a driver of change.

“...the introduction of a Child Poverty (Scotland) Bill constitutes a clear and highly public expression of the Scottish Government’s intention to tackle child poverty. By enshrining the commitment in legislation, the Scottish Government will help to ensure that the targets - and the political impetus behind them – endure, regardless of variations in popular opinion. Vitaly, legislation will also provide a means of ensuring future governments are bound by the duty to eradicate child poverty.” (Barnardo’s Scotland)

As in the above quote, another important reason mentioned by several respondents was that placing the ambition in statute would ensure current and future governments can be ‘held to account’ and their progress in tackling child poverty subjected to ‘scrutiny’.

Explaining their support, many respondents underlined the prevalence and impact of child poverty, including the impact on children’s development and life chances:

“For the children we support growing up in poverty means feeling cold, going hungry and being unable to fully join in activities at school, with friends or in the wider community. Child poverty not only blights children’s childhoods, it is likely to result in poorer financial prospects, health and wellbeing throughout the course of a person’s lifetime.” (Children 1<sup>st</sup>)

The impact of growing up in poverty on health, increases in the number of people lacking basic necessities, the relationship between poverty and child abuse and neglect, and child poverty’s role as a driver of inequality, were also mentioned. Some local government councils discussed the prevalence of poverty in their local authority.

The young people consulted by the Scottish Youth Parliament broadly agreed that the government should set a target for addressing or targeting poverty; however some were sceptical about using the words, “eradicating” or “ending” poverty as, “It’s too unreachable to aim to eradicate poverty.” (Scottish Youth Parliament)

## **2.2. Need to consider the wider policy context of child poverty**

Several responses provided thoughts on additional issues that ought to be considered alongside the ambition. The need to consider Child Poverty legislation within the wider context of other policy and legislative developments, and to make sure it is aligned with existing structures, was highlighted:

“At a higher, more strategic level, it is of crucial importance that the proposed legislation should be set within the context of the Government’s overall strategic direction. There already exists a wide range of legislation and policies, all of which seek to improve outcomes for our most disadvantaged citizens, and there requires to be clarity in relation to where the proposed child poverty legislation fits within this wider landscape, for example its relationship to the Economic Development Strategy, Fairer Scotland, Welfare Reform, Education Reform, Community Justice and Community Empowerment legislation. This will ensure a clear focus on agreed priorities.” (Local authority council)

Taking a ‘collaborative’, ‘holistic’ or ‘partnership’ approach was also seen as important. Several responses noted that other aspects of poverty or inequality are also important, including gender inequalities and gendered dynamics within the family; racial inequalities; the relationship between disability and poverty; and the need to consider the structural causes of poverty. A few respondents questioned why the Bill was limited to child poverty.

“However, we question why the framework is limited to Child Poverty and doesn’t adopt a broader focus on ‘poverty’ as a whole. The extent and existence of inequalities cannot be attributed to a single cause or risk factor. They are the result of economic and social circumstances and reflect an underlying unequal distribution of resources. For children, the circumstances of their parents or carers directly impacts on their experiences.” (Local authority council)

“At the start of September 2016, JRF published an independent strategy for solving poverty in the UK. It has much in common with the Scottish Government’s proposals, but it is an all-age strategy, reflecting the risks and costs faced by people at various points in their lives. We would encourage the Scottish Government to consider how far the Child Poverty Bill combined with the Fairer Scotland Action Plan and the approach to Inclusive Growth will provide the basis for a comprehensive approach to solving poverty across the population.” (Joseph Rowntree Foundation (JRF))

## 2.3. Legislation alone will not eradicate poverty

Although the majority agreed with including the ambition in statute, many also made the point that ‘legislation alone won’t eradicate poverty’. These responses noted that the ambition must be backed up by ‘actions’, ‘policies’ and/or ‘clear strategies’:

“We also emphasise the need to back up this process with a clear and robust Action Plan designed not just to measure Child Poverty but to eradicate it.” (Citizen’s Advice Scotland)

Similarly, the young people consulted also felt that “This needs to come with a real action plan and not be tokenistic” and “If you do have targets it has to be backed up by appropriate resources”. (Scottish Youth Parliament response) Others suggested the language for the proposed Bill should be stronger than ‘an ambition’, suggesting it be strengthened to a ‘commitment’ to eradicate child poverty, or the inclusion of a duty on Scottish Ministers to take action:

“While the ambition to eradicate child poverty is very welcome, we believe there is scope for the legislation to go further in terms of the strength of the obligation placed on the Scottish Government. While an ambition might be an appropriate means of expressing the government’s overarching intention to eradicate child poverty, we believe there is a need for that ambition to be underpinned by a duty on Scottish Ministers to take action. In particular, we believe the legislation should include a duty on Scottish Ministers to meet the four income based targets set out in the consultation document by 2030.” (Child Poverty Action Group (CPAG) in Scotland)

A few responses mentioned other concerns, including that the Scottish Government does not have all the relevant ‘income-generation and maintenance’ levers to address income inequality; the negative impact on poverty of UK Government welfare reform and the current economic conditions:

“I have a general concern that without the full levers of power regarding income generation and maintenance, including social security powers, it will be difficult to fully address income inequality.” (Children and Young People’s Commissioner Scotland)

A few also noted concerns around whether sufficient funding would be available to achieve the targets. Local authority respondents in particular were concerned about reductions in Council finances undermining efforts.

## 3. The income-based targets

### 3.1. Views on making income targets statutory

**Question 2 asked:**

**What are your views on making income targets statutory?** (105 respondents answered this question)

The majority of respondents agreed with the proposal to make the income targets statutory:

“We strongly support the implementation of statutory income targets for child poverty. Child poverty is intrinsically linked with family and parental poverty which means that income is central to the experience of poverty, and any measures of structural

determinants of poverty, like low pay, cannot be ignored.” (Glasgow Centre for Population Health)

Many of those who agreed highlighted that income is central to the experience of poverty:

“Poverty is, first and foremost, about household income. As such, it is important that income targets are retained in statute and remain the key indicators of poverty.”

(Local authority council)

The young people consulted also considered income to be the most important priority determining degrees of poverty: “money – it controls so much of what you do – it all comes down to that”, and agreed that income is important when measuring poverty (Scottish Youth Parliament). Other respondents noted, in support of the proposal, that statutory targets would be helpful to focus efforts, are crucial in order to measure progress, and are in line with the United Nations Convention on the Rights of the Child (UNCRC).

Nevertheless, several responses underlined that poverty is not about income alone, mentioning other causes and outcomes of poverty such as: inequality, lack of opportunity, the cost of living, good parenting, access to childcare, education, housing, worklessness, and health and well-being. Many of the young people consulted also agreed that using income alone would not provide a full assessment of poverty, and that the Scottish Government should be “looking at people as individual cases with different incomes who need different support”, noting that the costs of healthcare, childcare, education and travel are important to consider (Scottish Youth Parliament). The need to take into account differences between urban/rural poverty, the importance of inclusive growth and economic strategy, and local variations were also mentioned.

Save the Children mention the approach taken in the UK Child Poverty Act 2010, which placed a duty on the State to consider what measures ought to be taken in a range of areas, including employment, financial support, education and housing, in preparing a national strategy to tackle child poverty. They go on to say: “we believe this is a helpful approach and would urge the Scottish Government to consider including this within the proposed Bill; detailing those policy areas within its competence, where Ministers should consider taking action in support of the ambition to eradicate child poverty”.

Some local partners felt more clarity was required over who will be responsible for collecting the data and reporting on targets, as well as who the income targets would be statutory for:

“Further information is required regarding governance structures - who will have the responsibility for meeting these targets? What happens if these targets are not achieved?” (Aberdeenshire Council)

A few responses, again mainly from local authority councils, highlighted the need to make sure targets are aligned with existing reporting structures.

## 3.2. Views on the income-based measures

### Question 5 asked:

**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 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? (100 respondents answered this question)

In the consultation document the Scottish Government proposed setting targets based on the same four income-based poverty indicators as in the Child Poverty Act 2020, namely:

- **Relative poverty:** the percentage of children living in households with equivalised, net incomes of less than 60% UK median household income, in the same year.
- **Absolute poverty:** the percentage of children living in households with equivalised, net incomes of less than 60% of UK median household income, in the base year (2010/11), adjusted for inflation.
- **Combined low income and material deprivation:** the percentage of children living in low income households that lack certain basic necessities. Low income here is defined as an equivalised, net household income of less than 70% of the UK median household income.
- **Persistent poverty:** the percentage of children living in a household in relative poverty for at least three years out of a four-year period.

### 3.2.1. General support for the proposed measures

The majority of respondents agreed with the proposed measures. Reasons provided for agreement were that using the existing measures meant that they are 'robust', 'well known' and 'widely understood', 'comprehensive and complementary' and allow comparison with past progress as well as international comparison.

"CPAG strongly support use of the four income-based targets described in the consultation. These measures are internationally recognised as robust measures of child poverty and are the product of more than four decades of consultation and development by successive governments at UK and Scotland level. Achieving the four targets described will make a huge and immediate difference to the health, wellbeing and future prospects of tens of thousands of children across Scotland... we 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 reducing wider societal inequalities and improving child wellbeing." (Child Poverty Action Group (CPAG) in Scotland)

Some respondents wanted to know whether local targets would be set, whether targets could be measured at a local level, and how reporting would be disaggregated to show local variations.



“We would welcome more information on how reporting will be disaggregated to show local variations and where more effort and resources need to be deployed to reach the 2030 targets.” (Local Authority council)

A few respondents noted that they did not think that the persistent poverty targets were ambitious enough:

“An ambitious persistence target for families in Scotland would be no more than two years out of three. In addition, there is a strong case to conclude even this is too long for families with children, especially for under-fives. We know that families with children under five have higher poverty rates than other families and that long-term scarring effects result from growing up in poverty which are less evident with shorter spells.” (Joseph Rowntree Foundation)

As above, the impact on young children of being in poverty was highlighted as a key reason for this.

### **3.2.2. Suggestions for additional measures**

Additional aspects of poverty that several respondents thought were not sufficiently covered in the suggested measures focused on financial insecurity, depth/severity of poverty and taking into account the cost of living (and regional variations in this and income). The most commonly mentioned aspect suggested for further attention was the cost of living. Several respondents suggested using Joseph Rowntree Foundation’s Minimum Income Standard (MIS) measure to understand adequacy of income relative to essential costs; others mentioned ‘poverty after essential costs’, or the ‘Budget Standard Approach’. Depth or severity of poverty was also highlighted as an important issue to understand. Measuring levels of severe poverty or destitution (drawing on Joseph Rowntree Foundation and Citizen’s Advice Scotland’s research), and the ‘poverty gap’ – “the distance between the poverty line and the typical income of a family experiencing poverty” – were suggested. Some respondents thought that it would be helpful to measure being financially insecure and moving in and out of poverty in a year:

“We did observe, however, that the four income-based measures do not reflect inconsistency of income, when people are falling into and out of poverty, making it difficult to budget.” (Glasgow Centre for Population Health)

It was also suggested that measuring e.g. the “rate of people falling into and out of poverty more than once in a year, or a measure of the proportion of a year that a family/household spends in poverty” would be useful. Giving consideration to in-work poverty was also mentioned by some respondents (e.g. “the percentage of children living in households where at least one adult works”).

Other comments or suggestions made by one or two respondents included:

- Consider equality aspects and disaggregation in relation to measures
- Considering specific vulnerable groups of young people (looked after, teenage parents, young carers, migrants, asylum seekers, travelling populations etc.)
- The measures use UK median figures rather than Scottish figures
- Food and fuel poverty
- Disability i.e. percentage of children living in poverty where at least one person is disabled

- Place – a place based target to ensure that concentrations of child poverty within neighbourhoods in Scotland is also tracked and addressed
- Income inequality measure (20:20 ratio or Gini coefficient)
- Using the Family Affluence Scale from the Health Behaviour in School-aged Children (HBSC) study as a measure built from a young person's standpoint
- Subjective measures of wellbeing
- A measure of food insecurity
- Time-use surveys to understand women's time poverty
- A measure of poverty of experience/opportunity

### 3.3. Views on setting the target levels

#### Question 6 asked:

**What are your views on the Scottish Government's proposals for the levels of child poverty that the targets will be set at?** (101 respondents answered this question)

In the consultation document, the Scottish Government proposed that the Scottish targets should be set at the following levels:

- Fewer than 10% of children are in **relative poverty**
- Fewer than 5% of children are in **absolute poverty**
- Fewer than 5% of children are in **combined low income and material deprivation**
- Fewer than 5% of children are in **persistent poverty**

For the most part, there was agreement with the proposed levels for the targets to be set at. In general the proposed levels were seen as ambitious and challenging but realistic. In describing the levels as challenging, some respondents highlighted the background of UK welfare reforms, the Institute for Fiscal Studies (IFS) projections that poverty will rise by 2020, and the challenging economic climate. A few respondents, based on this context, noted concerns that there is a risk the targets will not be achieved.

“Whilst big improvements were made between 1994/5 and 2004/5, the improvement in the following 10 years have been much more modest. Current economic prospects are not all that encouraging, and progress over the next 14 years may also be modest. We believe that there is a significant risk that these targets might not be achieved.” (Local authority council)

“The impact of welfare reform has had a significant and adverse impact on a number of families and has, undoubtedly, compounded the issue of child poverty. It will be important that the Scottish Government ensures that the newly devolved powers in relation to Social Security are reviewed, with an emphasis on funding child poverty.” (North Ayrshire Council)

Others underlined that ‘significant political and economic effort’ or ‘more radical actions’ would be required to meet these targets:

“...meeting the targets will be extremely challenging. The public sector as a whole (including NHS Health Scotland) will have to be prepared to be more active in supporting this policy goal, if these are the targets adopted. This would mean moving beyond mitigating child poverty at the margins to preventing and undoing child poverty more directly. To do so may require more radical actions at a national level. Increasing child benefit is one option that has been recommended from evidence dating back to the Black Report. Recent modelling commissioned by CPAG Scotland provides illustration of the child benefit top up at various amounts and their impact on child poverty reduction.” (NHS Health Scotland)

However, most thought it was right that the targets were challenging.

“Any serious attempt to tackle this problem requires challenging goals to be set, and the targets proposed by the Scottish Government to be achieved by 2030 would appear to meet this requirement. Having said this, however, although aiming to get child poverty figures below 10% may be a challenging target, successfully achieving this goal should not be the end of the issue, only the beginning. Otherwise we will continue to fail our young people.” (Local authority council)

As above, some respondents raised the issue of the acceptability of leaving 5% of children in poverty, questioning whether this met the goal of ‘eradication’ or underlining that these targets should be seen as the starting point in eradicating child poverty.

“However, we also believe that, even if these targets are achieved, the Scottish Government’s ambition to eradicate child poverty should be relentless and continuous, and that through setting and achieving these identified targets it should simply encourage them to set and realise more ambitious targets to ensure that in the future no child in Scotland will ever experience poverty.” (Aberlour Child Care Trust)

A few respondents wanted more information on the evidence base used to determine the target levels:

“The Council welcomes these targets and agrees with the Scottish Government that these are ambitious. In order to help put these targets in context, it would be useful to understand what analysis has been carried out to arrive at these levels and whether the level of decline required has been achieved in the past by any international comparator countries.” (Local authority council)

Others again mentioned whether/how local targets would be set, and highlighted that local authorities are starting from different points:

“All local authority areas will be starting from different points and therefore local targets would be a better gauge of progress being made.” (Local authority council)

“However it is not clear how local areas with higher levels of child poverty... will be resourced to achieve the 2030 targets.” (Local authority council)

Several respondents suggested having interrim targets or milestones so progress towards the long-term targets can be assessed.

### 3.4. Views on setting targets on an After Housing Costs (AHC) basis

#### Question 7 asked:

**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? (97 respondents answered this question)

Again, most respondents agreed with setting the targets on an After Housing Costs (AHC) basis, highlighting that "housing costs are a significant factor in poverty" and that measuring poverty AHC provides a better indication of the resources available to households.

"We support this proposal. For most people, housing costs are an unavoidable expense, therefore, after housing costs levels of poverty are therefore a better indicator of levels of poverty in Scotland. We believe that after housing costs more closely reflect children and young people's lived experience and the resources they and their families have available." (Who Cares? Scotland)

"Shelter Scotland welcomes the proposal to set targets on an after housing costs basis. Compared to setting targets on a before housing costs basis, looking at after housing costs more adequately captures those households that pay disproportionately high costs for their housing due to type or location of their place of residence." (Shelter Scotland)

Several respondents underlined the importance of continuing to report on both Before Housing Costs (BHC) and AHC, noting that gathering information on both allows poverty to be better understood and that the BHC measure allows national and international comparisons, which are important.

"Housing costs are essential costs and we must take them into account. Both figures can be useful to show how much housing can impact on poverty levels and would inform policy to improve levels of affordable housing for those earning the least. If possible it would be useful to keep both measures as both give information which is useful." (Health and Social Care Partnership)

"We support this, and would encourage continued publishing of both BHC and AHC since these highlight the relative contribution of housing costs to poverty: a significant rise for working-age households, a reduction for older households and a smaller gap between BHC and AHC poverty figures than for the UK as a whole." (Joseph Rowntree Foundation)

A few respondents also suggested measuring poverty after other costs:

"While we support the argument for using the figures after housing costs, it would provide a truer figure if the key indicators in assessing poverty could include an indicator based on disposable income available after the deductions, not only for housing costs, but also average energy costs and transport costs which are also relevant factors in the battle against poverty, particularly in rural communities." (Local authority council)

It was also suggested by some that more consideration could be given to the definition of 'housing costs':

“...as this could potentially include a range of elements e.g. rent/mortgage, Council Tax, utilities, heating costs. Housing costs also vary widely across Scotland so it would be important to understand how an average cost could be weighted to account for local circumstances.” (Fife Partnership Board)

“It is also crucial that the amount allocated for housing is a true reflection of housing costs and at present the Household Below Average Income (HBAI) data does not seem to capture all relevant costs. The ‘housing’ costs only includes the ‘interest’ element of a mortgage and does not include the ‘capital’ element. While this may have provided a more accurate picture of expenditure on housing during the 1990s and early 2000s, when interest-only mortgages were common practice and the investment was meant to be covered by an endowment, it is less accurate today where capital and interest mortgage policies are the norm for owner occupiers. There seems to be a wide divergence concerning how housing costs are calculated and the costs allocated to housing do not seem to reflect the real costs.” (Shelter Scotland)

Shelter Scotland also highlighted some other aspects that the current definition of housing costs does not take account of: badly insulated housing with a low Energy Efficiency Rating might be cheaper, but pay much higher energy costs; equivalisation does not account for other important household circumstances, such as caring responsibilities and housing costs associated with disabilities and illness; the state of housing, which has an impact on child development and wellbeing.

### **3.5. Views on the date for achievement of the targets**

#### **Question 8 asked:**

**What are your views on the Scottish Government’s proposal to set targets that are expected to be achieved by 2030?** (101 respondents answered this question)

The majority of respondents agreed that the 2030 date for the targets to be achieved by was appropriate, suggesting that this date would be realistic, allow for long-term planning, and aligns with other action plans, particularly the Fairer Scotland Action Plan.

“It will take time to demonstrate the impact of this renewed outcomes focus on child poverty and we welcome the 2030 timeframe.” (Local authority council)

“This would seem appropriate and fits with the Fairer Scotland ambitions also set for 2030.” (South Lanarkshire)

A few respondents noted disappointment that the Race Equality Framework for Scotland 2016-2030 was not mentioned specifically in the consultation document. Several stated that they were disappointed that the UK level 2020 targets had been dropped; however, they accepted that it would be unrealistic for the Scottish Government to meet the income targets laid out by 2020. Others noted that the targets were set at ambitious levels and the AHC proposal in agreeing that the later date would be reasonable.

“Given the ambitious level at which Government is proposing setting targets, and given also that AHC is likely to be the preferred measure, 2030 would seem a reasonable timeframe for achievement.” (North Ayrshire Council)

As with the levels for the targets, a few suggested they would like to see evidence of why this date was chosen as appropriate:

“Citizens Advice Scotland would recommend that the Scottish Government undertake analysis and research on the feasibility of eradicating child poverty by particular dates, and what steps would require to be taken to achieve it, before settling on a particular point in time for a legislative target. Whilst it is important that challenging ambitions to eradicate child poverty are set, it is important that they are realistic. The Child Poverty Act 2010 aimed to achieve the targets in the ten years to 2020, which looks extremely unlikely to be achieved.” (Citizens Advice Scotland)

A minority of respondents felt that the 2030 date was not ambitious enough and the targets should be achieved in a shorter timeframe. Others drew attention to the children who would growing up in poverty during this timeframe:

“A target of 2030 seems reasonable in view of the size of the task ahead. In saying this, it is important to find methods of alleviating the effects of poverty for those who continue to live in such circumstances in the interim. Third sector agencies are well placed to support the Government in such efforts (for example Children in Scotland's Food, Families, Futures programme in Glasgow in the summer of 2016). These are short-term solutions to support the progress towards longer-term outcomes.” (Families Outside)

Many respondents underlined the need to set “interim”/“shorter term” targets or “milestones” to maintain momentum, assess progress towards the 2030 targets and make sure “we are making a difference to families in poverty now”.

“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. Interim targets would allow scrutiny and provide a useful way of measuring progress towards the 2030 goals.” (One Parent Families Scotland)

“The danger of setting achievement dates for targets so far into the future is that the targets lose “traction”, and are more vulnerable to impact from unanticipated major social or geopolitical changes.” (Local authority council)

## 4. The role of the Ministerial Advisory Group on Child Poverty

**Question 3 asked:**

**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?** (102 respondents answered this question)

### 4.1. Advising Scottish Government and providing oversight

A range of suggestions were made for developing the role of the Ministerial Advisory Group. Key areas where the Ministerial Advisory Group was seen as having a role were in advising on priorities and action; making links across different sectors and levels; independent scrutiny and monitoring; and disseminating good practice.

“There would seem to be a continued role for the Ministerial Group in terms of advising on priorities and action and providing a forum for the discussion of evidence and the dissemination of good practice.” (Angus Council)



As noted above, a key role respondents identified for the Ministerial Advisory Group was advising the Scottish Government on action to be taken to tackle child poverty and in developing the delivery plan. Linked to this was strengthening cross-government action and communication.

“One of the key strengths of a Ministerial Group is the influence that can be exerted by the Cabinet Secretary across SG and the wider public sector system to make positive change occur. Representation by other Ministers at some prior meetings has helped strengthen the cross-cutting nature of policy responses to child poverty. Therefore, the Group could ensure that there is cross-government Ministerial portfolio involvement in developing the legislation and inclusion of the level of accountability required.” (NHS Health Scotland)

“A key task of the Ministerial Advisory Group should also be to consider how action to eradicate child poverty can be communicated across government and link with other policy initiatives, particularly around closing the educational attainment gap and the expansion of early learning and childcare.” (Barnardo’s Scotland)

A few respondents felt that there should also be an independent body or commission established to provide oversight and scrutiny of the Scottish Government and its partners’ progress towards the targets:

“In addition, we feel there is also an opportunity in developing this legislation further to establish either a statutory independent body or post holder tasked with responsibility for providing oversight and scrutiny of the performance and progress of Scottish Government, local authorities, and any other relevant agencies in carrying out their statutory obligations to address child poverty. To this end, it is our opinion that such a statutory body or post holder’s functions should include a duty to annually report on performance and progress made towards statutory income targets.” (Aberlour Child Care Trust)

## **4.2. Making links and sharing good practice**

Making links between the national and the local level was also highlighted by several respondents. Aspects of this role that were mentioned were: clearer links to, and understanding of, the role that local authorities and community planning partners play in reducing poverty; developing understanding of local initiatives; connecting with local poverty and fairness commissions and local groups; and providing support to Community Planning Partnerships (CPPs) in drafting local strategies.

“This group should have a key role in leading on action to address child poverty. This should include providing support to Community Planning Partnerships in drafting local strategy as well as a monitoring role in confirming that at both national and local levels, action is being taken to address child poverty and outcomes targets are linked to equivalent local planning targets for child abuse and neglect.” (Social Work Scotland)

“This group should also have a key role in leading on action to address child poverty, including providing support to Community Planning Partnerships in drafting local strategies.” (Aberdeen City Council)

Another key role for the Ministerial Advisory Group that was highlighted by several respondents was in developing mechanisms for sharing good practice guidance, in particular with local partners.

“A potential role for the Ministerial Advisory Group could be to hear evidence relating to best practice, ensuring that such examples are grounded in research and can evidence impact. Furthermore, the Advisory Group could have a role in developing ways of ensuring that best practice is shared and replicated more widely across Scotland as appropriate.” (North Ayrshire Integration Joint Board)

“It would be helpful if consideration could be given to how the expert advice from the Ministerial Advisory Group could also be made available to local partners where appropriate, perhaps through CPPs.” (Aberdeenshire Council)

### **4.3. Profile and representation**

Several respondents noted that there was a lack of information available about the role and activities of the Ministerial Advisory Group.

“The Ministerial Advisory Group as an Advisory Board provides the Scottish Government with critical insight and expertise relating to child poverty. There is limited specific information available on their current role and active membership to allow comment on how this could be further developed.” (South Lanarkshire)

Linked to this, a number of respondents suggested that the role of the Ministerial Advisory Group should be higher profile and its visibility should be increased.

“The role of the Ministerial Advisory Group on Child Poverty could be strengthened, and there could be increased visibility of the Advisory Group’s work.” (Local authority council)

Regular meetings were suggested (a few respondents mentioned these should be at least quarterly). Several also suggested that, with the changing legislative situation, the remit of the Ministerial Advisory Group and its representation should be revisited.

“The key to the Ministerial Advisory Group is ensuring that the membership remains relevant and contemporary and contains the necessary expertise to advise on what is undoubtedly a complex issue. It would also be important that terms of reference are revised to ensure that the Group is given a key role from the outset in developing the legislation.” (North Ayrshire Council)

A wide range of suggestions were made for representation on the Ministerial Advisory Group. Incorporating an understanding of rural poverty was highlighted, particularly by rural local authorities:

“The Ministerial Advisory Group is valuable. However, it could be strengthened by ensuring sufficient representation from those with a background and understanding of poverty in rural areas.” (Local authority council)

Other groups or areas of topic knowledge suggested included:

- Those with lived experience of poverty
- The private sector/economic growth
- Trade unions/fair work convention
- Rural poverty
- Equalities groups, especially racial equality; gender equality and disability
- Health professionals

- Education
- The youth work sector
- Welfare, debt and financial wellbeing
- Housing
- Childcare
- Constitutional law
- Target setting and measurement of population health outcomes

In particular, many respondents stressed the importance of engaging with and including the voices of communities, families who have experience of living in poverty, and children and young people, and saw the Ministerial Advisory Group as having a role in ensuring they are consulted and their views taken into account.

“The group needs to have a fairly fluid programme of consultation and they need to come out and speak to communities, so that they can understand the lived experience of poverty in our disadvantaged areas.” (Health and Social Care Partnership)

“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.” (Children in Scotland)

Within this, specific groups that were mentioned were families who are experiencing severe difficulties and vulnerable groups, particularly care leavers.

The young people consulted by the Scottish Youth Parliament were asked how they could be involved in local and national efforts to tackle poverty. The overarching theme that emerged was around increasing representation of young people. The highest priority was identified specifically as: “registering young people in deprived communities to vote”. It was additionally felt that there was a need for young people, particularly those affected by poverty, to be regularly consulted, and that this should be included in government reviews at local and national level. Several young people also thought this increased representation could take place through “making an effort to get young people in positions of power.” (Scottish Youth Parliament response)

## 5. Links between the national strategy and local implementation

**Question 4 asked:**

**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. (102 respondents answered this question)

Many respondents noted the importance of taking a strategic approach across stakeholders and of partnership working, and welcomed the Scottish Government's focus on this. The key role of local government was highlighted:

“It will be important that Scottish local government is very much involved in shaping a Scottish approach to child poverty to ensure it reflects local priorities and reflects the pivotal role of local government. In addition, a Scottish approach to child poverty framed in a Child Poverty Bill should reflect COSLA's strategic principles in terms of an integrated approach to services, local accountability and an outcome based approach to tackle child poverty. Presently, there is a considerable amount of immensely valuable work carried out by local authorities to address child poverty... As such, it will be important that this work by local authorities is built upon.”  
(Convention of Scottish Local Authorities (COSLA))

### **5.1. Clarifying roles and responsibilities**

Several respondents highlighted that, to improve links between national strategy and local implementation, it would be important to clarify roles and responsibilities for all partners:

“We believe there is a need for stronger links between national and local implementation than currently exist under the Child Poverty Strategy for Scotland. This can be achieved, in part, by providing more clarity within the proposed legislation and subsequent delivery plans about the role of local authorities and their community planning partners in reducing child poverty.” (Child Poverty Action Group (CPAG) in Scotland)

A role was also seen for the Scottish Government in providing advice on prioritising different national initiatives and strategies. A need for clarity over expectations around whether local authorities would produce and report on local strategies was also identified.

### **5.2. Local duties, targets and reporting**

In general, those who discussed requiring local targets and reporting felt this would be appropriate, but that reporting ought to be proportionate and streamlined with existing duties, targets and reporting requirements so as not to place too great a burden on local authorities and Community Planning Partnerships. Community Planning Partnerships were identified by many respondents as having a key role in local implementation through Local Outcome Improvement Plans (LOIPs):

“There is a need to ensure national strategy is linked to the priority areas being progressed locally through the new Locality Outcome Improvement Plans. There is a key role for Community Planning Partnerships in ensuring oversight of the range of services and inputs required to deliver a collaborative approach to eradicating child poverty.” (Community Planning West Dunbartonshire)

“The reporting structure for the strategy needs to be linked to the local Single Outcomes Agreements and the activity of Community Planning Partnerships and Integration Joint Boards (regarding their specific delegated responsibilities for health and wellbeing). There must be clear links made to Children's Services Plans to ensure that action to address poverty cuts across wider action to support and protect children's wellbeing.” (Social Work Scotland)

Several respondents noted that any reporting requirements should be linked to Local Outcome Improvement Plans and Children's Services Plans:

"In relation to child poverty there requires to be clear links with community planning and children's services planning and in particular to the development and reporting in relation to the new Children's Services Plan and to the Local Outcome Improvement Plans and associated locality/neighbourhood plans. Poverty associated work and the development of a linked 'anti-poverty' strategy is likely to feature in a both these areas and co-ordination across this agenda is crucial." (Local authority council)

Establishing standard reporting requirements across Scotland was also mentioned.

Several respondents, particularly from the third sector, suggested that a duty should be placed on local authorities and Community Planning Partnerships to "take a strategic approach to child poverty" or "to reduce child poverty locally and to produce annual reports which identify what progress they have made in meeting these targets".

"In order to ensure greater consistency and accountability across all local authority areas ECP [End Child Poverty Campaign] 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." (Children in Scotland)

Save the Children note that the Welsh Government's Child Poverty Measure and the UK Child Poverty Act 2010 both placed similar duties on local authorities in Wales/England. Additionally, NHS Greater Glasgow and Clyde, Corporate Inequalities Team noted that "The HEAT target review could lead the way in ensuring that child poverty is a priority for health services". A few respondents suggested requiring child poverty impact assessments for every decision nationally and locally or "poverty-proofing" all national and local policies. Use of a Socio-Economic Duty, requiring public sector bodies to exercise their functions in a way that is designed to reduce the inequalities of outcome that result from socio-economic disadvantage was also mentioned by a few.

Several respondents highlighted the importance of adequate resourcing – "at a time when public services are under considerable pressure", as well as local flexibility to deliver action to tackle child poverty at local level:

"The NASUWT agrees that partnership working is critical to effective child poverty reduction strategies. However, it is important that agencies with responsibility for the wellbeing of children and young people are able to collaborate effectively to address poverty and its causes. Collaborative working has to be supported and facilitated and requires the investment of time and financial resources." (NASUWT)

Scottish Trades Union Congress (STUC) and Unite noted the issue of pre-devolution debt and interest payment being made to the UK Treasury's Public Works Loans Board (PWLB), in relation to local government finance.

### **5.3. Support for sharing learning and disseminating best practice**

Linked to the role for the Ministerial Advisory Group mentioned in Section 4.2 regarding developing and sharing best practice guidance, a key suggestion in



improving local implementation was developing mechanisms for local partners to share learning and experience with each other and the Scottish Government, and to disseminate and replicate best practice.

“In terms of sharing best practice, Scottish Government should create and fund opportunities, both real and virtual, for colleagues to come together for this purpose - conferences, webinars, and online hubs, would be useful, for example. (Educational Institute of Scotland” (EIS))

“[Community Planning Partnerships] already undertake extensive sharing of best practice, across the entirety of their remits, and this will continue to be the case in relation to tackling poverty, however any additional government support for this interaction on a national basis will always be welcomed, whether through the Improvement Service or another forum.” (Community Planning Partnership)

A role was seen for the Scottish Government and the Ministerial Advisory Group in supporting local partners in sharing learning, and identifying and sharing effective approaches to tackling poverty:

“There is already effective practice at a local level and councils and their partners are making a considerable contribution. However, there is a key role for the Scottish Government in helping to identify the most effective approaches to tackle the wide range of challenges that poverty presents; and supporting the implementation of these approaches in a range of different local contexts.” (Fife Partnership Board)

The Independent Commission model used by some local authorities was mentioned as effective by a few respondents:

“In the last two years a number of local authorities, such as Renfrewshire, Shetland and Fife have established independent Commissions to consider evidence and develop recommendations for addressing poverty and inequality in the area. These models have been well-received and have resulted in local authorities adopting strategic plans for addressing child poverty (or poverty and inequality more widely), with bold and challenging targets.” (Citizen’s Advice Scotland)

A need for improved analysis and dissemination of local level data and clarity on data collection needs at local level was also highlighted:

“...having up to date information available regularly at a local level could make it easier for local partnerships to monitor and track progress and respond more effectively to local changes. Information relating to the uptake of social welfare payments, indicators of in work poverty, levels of sanctions and other key factors would be useful in demonstrating progress and responding to trends.” (Local authority council)

## 6. The Child Poverty Delivery Plan

**Question 9 asked:**

**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?** (105 respondents answered this question)

In general, respondents agree that the proposal to produce a Child Poverty Delivery plan every five years and to report on the plan annually would be appropriate.



Several responses highlighted that the five year plan was a 'realistic timeframe' and would provide a strategic focus and allow a focus on longer-term outcomes; but also that it is important to assess progress regularly to 'provide accountability and transparency', which the annual reporting would allow.

"As noted in the consultation document, the reduction or eradication of child poverty represents a long term transformational challenge. In order to encourage the long term planning and actions required to meet this challenge it is useful to set an ambitious target outwith the short term timeframe held by most policies and strategies. The development of short term plans alongside annual reports showing progress towards this long term target is one the Council would welcome in principle." (Local authority council)

A few mentioned that aligning the delivery plan with parliamentary terms would be helpful, but also that the first delivery plan should be produced as soon as practicable with the current parliament. Others highlighted the importance of being able to revise and review delivery plans at regular intervals in order to take account of changing circumstances.

A few respondents noted that careful thought would need to be given to what would be reported annually, as many indicators would not be expected to change in this timeframe:

"As to annual reporting, there may be some measures that will show movement on an annual basis however others may well take years to manifest. How this would look (being reported on an annual basis) may well impact on the way the implementation of the Bill will be received i.e. the negative (no perceived movement in measures) will outweigh the positive impacts and changes made." (South Lanarkshire)

A few suggested that the annual reports should be presented to Parliament and scrutinised by Committee:

"The Foundation would suggest that the annual report on the Child Poverty Delivery Plan should be presented to the Parliament and debated in the Chamber (as happens with the Scottish National Action Plan on Human Rights for example). There should also be Committee involvement in scrutinising plans and progress." (Lloyds TSB Foundation for Scotland)

Several respondents underlined the importance of taking into account local authority planning structures and reporting timescales, including Children's Services planning and Local Outcome Improvement Plans:

"To ensure an integrated approach, it would be helpful if the Child Poverty Delivery Plan was developed in collaboration with [Community Planning Partnerships] and people with lived experience of poverty, to ensure that it adequately reflects their aspirations...The reporting timescales are required to be realistic and in line/integrated with other reporting structures, such as the existing Children's Services Planning requirements such as the Children and Young People (Scotland) Act 2014." (Aberdeenshire Council)

As above, the need to collaborate with Community Planning Partnerships was also underlined by some.

A minority of respondents questioned whether five-yearly delivery plans would be the most appropriate timeframe. Some individual responses felt five years was too

long. A few organisational responses suggested a four-yearly timeframe in order to allow three delivery plans to be produced within the timeframe:

“This would only allow for two new delivery plans. A four year plan would allow for this to be revised more often. We agree that annual reporting is necessary to monitor progress.” (Local authority council)

Others suggested a three-yearly timeframe so as to be consistent with other local reporting structures, such as Children’s Planning cycles.

The importance of adequately resourcing the delivery plan and being clear on actions and responsibilities was again highlighted in responses to this question:

“It is important that this delivery plan is adequately resourced and that resources required for its realisation are set aside at each spending review between now and 2030. The delivery plan must also clearly set out actions, allocate responsibilities and identify funds.” (UNISON)

Publishing an Equality Impact Assessment alongside each Delivery Plan to ensure “all equalities groups have been considered in the development, delivery and progress of the Plan” (Coalition for Racial Equality and Rights (CRER)) was suggested. It was also noted that dissemination of the Delivery Plan is important:

“The Scottish Government should also consider how the reporting on the delivery plan can be made accessible, meaningful and transparent to people living in poverty across Scotland.” (Local authority council)

## 7. The Child Poverty Measurement Framework

**Question 10 asked:**

**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? (99 respondents answered this question)

The Child Poverty Measurement Framework currently contains a range of indicators, arranged under the three themes of ‘Pockets’ (maximising household resources), ‘Prospects’ (improving children’s wellbeing and life chances), and ‘Places’ (provision of well-designed, sustainable places).

### 7.1. Support for the current framework

A number of respondents were generally supportive of the child poverty measurement framework, which was praised for being comprehensive.

“The current framework with its themes of ‘Pockets, Prospects and Places’ is supported. Indeed, the approach has been used within North Ayrshire as a framework to review progress at a local level.” (North Ayrshire Council)

As in the example above, some local authorities commented that they used a similar style of reporting on child poverty in their local area.

Some respondents mentioned the importance of linking the measurement framework with existing Scottish Government policies, as well as embedding children’s rights through the United Nations Convention on the Rights of the Child

(UNCRC). Most commonly mentioned were links with the Children and Young People (Scotland) Act 2014, and Getting It Right for Every Child (GIRFEC), with its eight SHANARRI principles (safe, healthy, achieving, nurtured, active, respected, responsible and included). The National Youth Work Strategy and the new Mental Health strategy were also mentioned.

It was also felt that certain existing data sources, and sets of indicators could feed into the future development of the measurement framework. These included indicators around children and young people developed by the Scottish Public Health Observatory (ScotPHO), indicators developed by Glasgow Centre of Population and Health (GCPH) to track trends in health and inequality in Glasgow and West Dunbartonshire, indicators being developed to support the delivery of Children's Services Plan around the Children and Young People (Scotland) Act 2014. In addition, including information from Looked After Children data collection, the number of businesses offering the Scottish Living Wage, and the numbers signed up to the Scottish Business Pledge was suggested, as was including information derived from the Family Affluence Scale, which is used in some local and national surveys to measure experience of poverty by families.

## **7.2. Views on the current indicators**

### **7.2.1. More emphasis on pockets**

Some respondents, particularly third sector organisations, called for a greater emphasis on income and the 'Pockets' indicators. A number of suggestions for additional indicators were given (see Table 2 below). However, others, predominantly within local authorities and public bodies, suggested the framework be streamlined, contain fewer indicators, and focus on indicators which are already incorporated within existing frameworks, in order to reduce the burden of data collection.

"The Performance Framework is very cluttered and there is a danger of the focus being on reporting rather than doing... The framework needs to be streamlined to report on fewer indicators." (Local authority council)

A recurring critique of the existing indicators, particularly from third sector respondents, was that the link between the indicators and eradicating child poverty was not always clear. In particular the inclusion of indicators around smoking, finding it easy to talk to their mother, and neighbours stopping to talk to one another was questioned.

"Alongside colleagues on the End Child Poverty Campaign, we welcomed the introduction of the Child Poverty Measurement Framework in 2015. However, we believe that the contents of any renewed framework measurement are more closely linked with four income based targets. While many of the current indicators are useful, others are not directly linked to poverty including smoking and ease at talking to parents. We would like to see new measures linked directly to the proposed new income targets focusing on maximising household incomes." (UNISON)

A preference for indicators linked to the four income based targets was also expressed.

### **7.2.2. Suggestions for indicators to amend**

Suggestions for amending specific indicators focussed on the 'Prospects' indicators show below:

- Attachment, relationships (fathers, and other appropriate adults) and social connections
- Nutrition
- Positive destinations rather than modern apprenticeships
- Smoking, alcohol and drug use

The indicator around attachment – children finding it easy to talk to their mother – was criticised by some who felt that this was too narrow and felt that attachment to the father, as well as other social connections should be reported on. Under nutrition, it was suggested that access to fresh affordable food, or eliminating the need for food banks would be better indicators than the current indicator around eating 5 portions of fruit and veg a day. It was suggested that focussing on positive destinations might be better than including the indicator around modern apprenticeships as “modern apprenticeships are used by many young people, not just those in poverty”. Finally it was suggested that if smoking was included as an indicator, then alcohol consumption and drug use should also be included.

There was a strong desire for data at a local level, particularly from local authorities and public bodies. This included data at local authority level and below, such as at ward and data zone level and community and neighbourhood level. It was felt that local level data was required in order to inform and assess local actions. The ability to compare with other local areas was seen as desirable.

“Wherever possible these should be replicable at a ward level to help local authorities understand the nature of child poverty in their area, the outcomes achieved by projects in the area and allow meaningful comparisons to other areas.” (Aberdeen City Council)

There were also some comments around the quality and robustness of the data, with issues raised including the time lag between data collection and reporting, and adequate sample sizes for sub-national reporting.

### **7.2.3. The role of the Scottish Index of Multiple Deprivation (SIMD)**

A small number of comments related to the Scottish Index of Multiple Deprivation (SIMD). Some of these suggested that aligning the measurement framework to the seven SIMD domains would be useful (Income, Employment, Education, Health, Access to Services, Crime and Housing). However others noted that, as not all deprived children live in deprived areas, indicators which focus on the most deprived areas within SIMD will not capture these children:

“A focus only on the 20% most deprived neighbourhoods, as measured by a basket of domain indicators, offers only a partial view of poverty experiences. For Scotland as a whole, SIMD 2012 showed just over one-third of children in poverty lived in the most deprived fifth of places. In mainly urban authorities like Renfrewshire, SIMD 2016 shows just over half of income deprived people are concentrated in these neighbourhoods. But in an authority like Perth and Kinross, the share is less than a fifth. Area-based measures are important, but need to be complemented with

measures of how all people in poverty are faring at home, at school, in and out of work and in families and communities.” (Joseph Rowntree Foundation).

There were also calls for further qualitative research, as well as reporting on indicators:

“Monitoring should be qualitative as well as quantitative and show the impacts of programmes and projects on national and local targets and positive impacts on people who have lived in poverty.” (Fife Partnership Board)

As also raised regarding the Ministerial Advisory Group (Section 4.3), it was seen as particularly important that the voices of children and families living in poverty are heard and feed into the evidence base.

### **7.3. Moving forward: capturing different experiences of poverty**

As also raised under Section 3.2 on income-based measures, a number of respondents commented that poverty is not experienced equally across the Scottish population and that those who share certain protected characteristics are more likely to experience poverty; therefore, this should be reflected in the measurement framework. There were also calls to disaggregate data by equality characteristic where possible, in order to build up a clearer picture of poverty as experienced by those groups. It was noted that equality groups are not homogeneous and may experience poverty differently.

“As the EHRC’s recent publication “Is Scotland Fairer” shows, the life chances of people in Scotland are significantly influenced by the protected characteristics that they do or do not share. Overall, disabled people and ethnic minorities experience poverty at a higher rate than non-disabled white Scots. Women experience significant pay gaps in the labour market, and ethnic minorities and disabled people both experience significantly higher unemployment and under employment. Both ethnic minorities and disabled people are known to experience barriers to accessible or appropriate housing... For the Child Poverty strategy to work effectively, and to deliver for all Scots, it needs to contain sufficient nuance to ensure that measurements reflect and do not hide these realities.” (Equality and Human Rights Commission (EHRC))

“All measurement frameworks and indicators should be disaggregated for equalities groups as efforts to change the situation for one group may not necessarily address disadvantage for all groups. Different approaches, initiatives, and tactics will be needed to address poverty for all children; disaggregation of data and measurements is key for this.” (The Coalition for Racial Equality and Rights (CRER))

The differing experience of poverty in rural compared to urban locations was also highlighted, with varying factors such as transport, fuel poverty and housing costs being mentioned, alongside access to services.

“Further, local and regional variations in the cost of living at a household level must be taken into account if all poverty is to be eradicated across Scotland such as fuel poverty and transport in isolated island and rural areas.” (Convention of Scottish Local Authorities (COSLA))

### **7.4. Moving forward: suggestions for indicators to amend/add**

A number of respondents, particularly from the third sector, were keen that the emphasis in the child poverty framework was on measures relating to income – the

'Pockets' section of the framework. It was stated that whilst poverty is about more than just income, there was a desire for indicators to be linked more closely to the four income targets. It was also noted that the number of existing 'Pockets' indicators seemed low compared to the number of indicators included under 'Prospects' and 'Places'. As noted above, it was felt that the connection between child poverty and some of the included indicators under 'prospects' and 'place' are tenuous. More indicators more closely linked to income, were requested.

"New indicators must relate clearly and directly to the proposed targets, focussing on maximising household income, reducing rates of material deprivation and reducing housing costs." (Child Poverty Action Group (CPAG) in Scotland)

"Although there is more to child poverty than how much resources a family has, it is key and the number of measures linked to the 'pockets' theme seem low in comparison to prospects and places." (South Lanarkshire)

There were a number of suggestions for additional indicators under each of the three P's 'Pockets', 'Prospects' and 'Places'. As noted above, a number of respondents placed an emphasis on 'Pockets', which is reflected in the number and variety of suggestions for indicators received for 'Pockets'. Tables 2-4, below, show the suggestions for topics for additional indicators under 'Pockets', 'Prospects' and 'Places' in turn. For each table, suggestions are ranked from those that were most frequently suggested, down to those suggested by only one respondent

#### **7.4.1. Pockets**

As can be seen, the most commonly suggested 'Pockets' indicators related to benefits, including uptake of benefits, as well as the adequacy of benefits, benefit sanctions, and the number of families affected by the benefits cap.

"There are a number of significant indicators of child poverty that are missing, for example relating to families' income, such as the adequacy of benefits, compared to the level of income required to take families out of poverty." (One Parent Families Scotland)

Indicators relating to parental employment were also frequently suggested, including issues such as in-work poverty, living wage and zero hours contracts.

"The impact of insecure employment, such as zero hour contracts are one of the principal causes of poverty. Given the recognition within the Child Poverty Bill consultation that families: "will dip in and out of poverty over an extended period perhaps because of insecure employment," it would be helpful to recognise this within the child poverty measurement framework." (Children 1<sup>st</sup>)

Indicators around debt, childcare and relating to the "poverty premium" (whereby those in poverty may have to pay more for goods and services as they are often unable to pay bills in a single instalment or to pay via direct debit where a discount may apply) were also requested, as were indicators relating to food poverty, and the use of services such as food banks, financial inclusion services and the Scottish Welfare Fund. Suggested indicators around childcare related primarily to the uptake of nursery places, but also acknowledged the role of affordable and flexible childcare in helping parents to access employment.



“We would suggest that access to out of school care, including breakfast clubs and holiday clubs and activities such as summer food programmes should be included in the measure... Childcare is so essential to address underemployment/unemployment and for parents, especially lone parents, to access the labour market.” (Scottish Out of School Care Network)

Table 2: Suggested topics for additional ‘Pockets’ indicators

Suggested Topic for additional ‘Pockets’ indicators	Number who suggested this
Benefits – including: - Uptake of benefits - Adequacy of benefits - Benefits sanctions - Number of families affected by benefits cap	More than 10
Parental employment, in-work poverty - living wage/zero hours contracts	More than 10
Debt	More than 10
Childcare/nursery places and out-of-school care	6-10
"poverty premium"	6-10
Free school meal uptake	6-10
Food poverty/household food insecurity	6-10
Access to services such as food banks	2-5
Accessing Scottish Welfare Fund (SWF)	2-5
Access to welfare rights information/income maximisation	2-5
Disposable income after housing costs/lower proportion of income spent on housing	2-5
Cost of school day/school holiday	2-5
Housing - temporary accommodation/short-term housing solution costs & private rented sector	2-5
Income compared with Minimum Income Standard (MIS)	1
Focus on the poorest deciles	1

#### 7.4.2. Prospects

For ‘Prospects’, a range of additional health indicators were suggested including ones which could act as “proxy” indicators for poverty, such as dental decay:

“Further, the proposed measures do not adequately reflect health and wellbeing measures. There are a number of health and wellbeing measures that are better proxies for child poverty than many of the indicators selected, e.g. childhood obesity at P1, dental disease at P1 and P7, smoking in pregnancy; child and adolescent mental health and barriers to parental employment such as disability or living with a long-term condition. These indicators would provide a better insight into how child poverty adversely impacts on health and wellbeing, or how the material circumstances of parents can adversely impact on the health and wellbeing of children.” (Aberdeenshire Council)

Parental mental health and substance misuse were also classed as important indicators.

“In terms of collecting data, it is the view of the Centre that the data should reflect any other factors that may have a contributing element to child poverty, such as domestic violence, mental health, presence of drug or alcohol abuse or other addictions. The measures to be employed to tackle these issues should also acknowledge and reflect the link between the two.” (Scottish Child Law Centre)

Additional data and indicators around household type were requested, as certain household types, such as lone parents, those with disabilities, or families from ethnic minorities might be more vulnerable to poverty.

“Most analysis shows wide variance of experience of poverty by household type. It would be useful to consider measures to track levels or impact of poverty among lone parent households, households with disabled children, or minority ethnic households” (Local Authority council)

It was also felt that data relating to child protection and looked after children should be included, as children who are looked after might be particularly vulnerable to living in poverty.

“As a group, care experienced young people are most likely to begin and end their lives in poverty. As such, progress in terms of eradicating poverty for this group should be taken as an indicator of overall progress in eradicating child poverty.” (Who Cares? Scotland)

A range of indicators relating to educational attainment were proposed, including looking at early years attainment, inter-generational attainment, and the proportion of young people with Additional Support Needs.

“Given that education remains arguably the single most significant route out of poverty, it may be useful to develop a measure that allows us to compare children’s educational performance against previous parental performance. Such a measure may be too complex to establish but would be a useful indicator of progress.” (North Ayrshire Integration Joint Board)

Indicators were also requested around food poverty and household food insecurity.

“We would ask that the Government develops a robust measure for [Household Food Insecurity]. Household food insecurity can result in children living in poverty experiencing dietary inequalities that impact on their health outcomes and life chances.” (Inclusion Scotland)

Table 3: Suggested topics for additional ‘Prospects’ indicators

Suggested Topic for additional ‘Prospects’ indicators	Number who suggested this
More/different indicators around health and wellbeing (including parental mental health)	More than 10
Household type, including lone parent and protected characteristics such as ethnicity and disability	6-10
Child protection/looked after children	6-10
Educational attainment including: - Early years attainment - Educational attainment (including inter-generational) - Proportion of pupils with Additional Support Needs (ASN)	6-10
Parental substance misuse	6-10
Crime/victimisation	2-5
Community Learning and Development (CLD)	1
Experience of domestic violence	1
Levels of poverty at birth	1

### 7.4.3. Places

Indicators around fuel poverty were the most commonly suggested under ‘Places’, followed by access to hobbies/culture/sport/leisure and play facilities, and satisfaction with those facilities. Indicators around housing quality were also suggested.

In addition to access to sport and leisure there were other suggestions for indicators around local access to positive things such as good quality food, transport, and access to good quality employment opportunities. In addition there was a suggestion to also measure access to more negative things such as the number of fast food outlets and betting shops, as these may be seen in higher numbers in more deprived areas.

“Under PLACES, it could be stated more explicitly that it is particularly important to have access to play spaces (natural and purpose-built) for children and young people from low income households. Currently, children from deprived areas have less ready access to different types of play space in their local area which in turn will impact their physical and mental wellbeing, social skill development and resilience.”  
(YouthLink Scotland)

Table 4: Suggested topics for additional ‘Places’ indicators

Suggested Topic for additional ‘Places’ indicators	Number who suggested this
Fuel poverty	6-10
Access to hobbies/culture/sport/leisure/play facilities (and satisfaction with quality of those services)	6-10
Housing quality	6-10
Access to good quality food	2-5
Number of children living in temporary accommodation/number of homelessness applications made by families with children	2-5
Access to transport	2-5
Access to good quality employment opportunities	1
Numbers of betting shops/fast food outlets	1

## 8. Additional comments

Finally, respondents were provided with the opportunity to add any further comments they wished to their response. Several mentioned again that they welcomed the focus on child poverty. A few noted areas that they felt required further clarity, including: the process and timetable for the Delivery Plan; what new measures and/or funding would support the Delivery Plan, and more detailed information on practical interventions; who is included in ‘Team Scotland’ and the role of local authorities; and the definition of ‘children’.

A number of respondents used this space to re-emphasise issues they consider particularly important to tackling child poverty, including: education; the economy, jobs and skills; gender pay gap; access to childcare; rurality; affordable transport; fuel poverty; place; mental health; welfare; wellbeing of parents. The importance of taking into account the views of families, children and young people experiencing poverty, and understanding the impact and extent of poverty in different groups (particularly relating to ethnicity, gender and disability) were also emphasised again.

Action on Smoking and Health (ASH) Scotland, who provided their response as a separate document, argued that any poverty strategy ‘must deal with tobacco use’, underlining that:

“Poverty and tobacco go hand-in-hand. Smoking is not a root cause of poverty, but it exacerbates poverty and inequality and is a crucial mechanism through which inequality translates into harm.” (Ash Scotland)

The Royal Town Planning Institute (RTPI) Scotland highlight the importance of place-based policies:

“The built environment can have a profound effect on people’s behaviours and opportunities. Alongside conventional ‘people-based’ welfare policies, a much stronger focus on coordinating place-based strategies and activities could do much to reduce poverty, inequality and the social problems that stem from them.” (RTPI Scotland)

They also point out opportunities to do this: the affordable homes commitment, city deals, Community Planning Partnerships and local development plans.

The Scottish Youth Parliament’s consultation with young people asked their views more broadly on the causes of poverty and ideas on how child poverty should be tackled. The discussions highlighted education, particularly the costs of education and differences in expectations; family background, including access to role models; the impact of poor health and disability; and living in a low income or rural area as factors contributing to poverty. Lack of employment opportunities, low wages and zero hour contracts; variation in the quality of educational experiences and lack of resources and support; stigma towards those living in poverty; and lack of aspiration, were considered to be barriers to getting out of poverty. The main priorities the young people identified for tackling poverty were: increasing the living wage for all ages; increasing voting in young people; increasing knowledge and awareness of poverty among young people; consulting young people in decision-making; and addressing and closing the attainment gap.

Many respondents used this opportunity to comment on proposed or existing policies and approaches to help tackle child poverty. These covered a wide range of areas including: early learning and childcare provision; the Best Start Grant; Free School Meals and the cost of education; the use of new social security powers, a suggested single rate top up to child benefit, and income maximisation and welfare rights checks; the role of the social rental sector in alleviating poverty; reducing the number of people going to prison; child maintenance systems; the impact of domestic abuse; and rights-based approaches.

# Annex 1: Consultation questions

1. Do you agree with the Scottish Government including in statute an ambition to eradicate child poverty?
2. What are your views on making income targets statutory?
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?
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.
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 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?
6. What are your views on the Scottish Government's proposals for the levels of child poverty that the targets will be set at?
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?
8. What are your views on the Scottish Government's proposal to set targets that are expected to be achieved by 2030?
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?
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?
11. Do you have any additional views on a Child Poverty Bill for Scotland?



## Annex 2: Respondents

30 individuals

21 organisations wished their responses to remain anonymous

Aberdeen City Council  
Aberdeenshire Council  
Aberlour Child Care Trust  
Action on Smoking & Health (ASH) Scotland  
Angus Council  
Barnardo's Scotland  
Child Poverty Action Group (CPAG) in Scotland  
Children & Young People's Commissioner Scotland  
Children 1st  
Children in Scotland  
Church and Society Council of the Church of Scotland  
Citizens Advice Scotland  
Community Planning West Dunbartonshire  
Convention of Scottish Local Authorities (COSLA)  
East Dunbartonshire Council  
End Child Poverty  
Engender  
Evangelical Alliance Scotland  
Families Outside  
Fife Gingerbread  
Fife Partnership Board  
Food for Life Scotland - Soil Association  
Glasgow and West of Scotland Forum of Housing Associations  
Glasgow Centre for Population Health (GCPH)  
Glasgow Poverty Leadership Panel  
Health and Social Care North Lanarkshire (HSCNL)  
Inclusion Scotland  
Joseph Rowntree Foundation (JRF)  
Lloyds TSB Foundation for Scotland (the Foundation)  
Midlothian Council  
Midlothian Joint Health Inequalities Partnership  
Mindroom  
NASUWT  
National Day Nurseries Association (NDNA)  
NHS Ayrshire & Arran Public Health Department  
NHS Grampian  
NHS Greater Glasgow and Clyde, Corporate Inequalities Team  
NHS Health Scotland  
NHS Lanarkshire  
NHS National Services Scotland  
North Ayrshire Council

North Ayrshire Integration Joint Board  
Nourish Scotland  
One Parent Families Scotland  
Poverty Alliance  
Research team for the Nuffield funded research project: "Identifying and Understanding Inequalities in Child Welfare Intervention Rates: comparative studies in four UK countries"  
Royal Town Planning Institute (RTPI) Scotland  
Save the Children  
Scottish Child Law Centre  
Scottish Out of School Care Network  
Scottish Women's Aid  
Scottish Youth Parliament  
Shelter Scotland  
Social Work Scotland  
South Lanarkshire  
Stirling Council  
Scottish Trades Union Congress (STUC)  
The Coalition for Racial Equality and Rights (CRER)  
The Educational Institute of Scotland (EIS)  
The Royal College of Paediatrics & Child Health (RCPCH)  
The Salvation Army  
UNISON  
Unite the union Scotland  
Who Cares? Scotland  
YouthLink Scotland

### **How to access background or source data**

The data collected for this social research publication:

- are available in more detail through Scottish Neighbourhood Statistics
- are available via an alternative route: the consultation responses (where the respondent agreed for their response to be published) can be accessed on the Citizen Space website
- may be made available on request, subject to consideration of legal and ethical factors.
- cannot be made available by Scottish Government for further analysis as Scottish Government is not the data controller.



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