

Aberlour's response to the Scottish Government's Child Poverty Action Bill consultation

September 2016

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Introduction

As Scotland's largest, solely Scottish Children's charity, Aberlour supports any and every attempt to end child poverty. More than one in five children in Scotland currently live in poverty and we believe it is unacceptable that any child in Scotland should experience poverty for any reason. We are concerned by the UK Government's revision of its duties in relation to tackling child poverty as outlined in the Child Poverty Act 2010, which it has chosen to repeal and as a result implement changes as to how child poverty is defined in legislation. Therefore, we welcome the Scottish Government's recognition of its own responsibilities and obligations in continuing to tackle the worst effects and impact of child poverty, and its attempts to unilaterally continue to address this complex and challenging issue.

Working in over 40 locations across Scotland, we provide services which support vulnerable children, young people and families across a range of settings and contexts. The children, young people and families we support experience vulnerability and multiple challenges on a daily basis as a result of being in care, having complex additional support needs and disabilities, facing issues around dependency, or having experienced significant disadvantage. We see the effects of child poverty every day and the impact it has on many of the children and families whom we support, as well as on numerous communities across Scotland, and understand that the impact of child poverty is not only identified and measured in financial terms but is also experienced by children in Scotland through a poverty of ambition, opportunity, skills and encouragement.

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

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. However, whilst the Scottish Government outlines that "***the key purpose of the Child Poverty Bill will be to enshrine in legislation a Scottish Government ambition to eradicate child poverty***", it must also recognise that child poverty is a complex issue which cannot be remedied by a legislative framework alone. Nonetheless, such legislation can ensure that both the current and successive Scottish Governments can be held to account in relation to their obligations to combat child poverty, and we therefore welcome such a development. We also believe the Scottish Government could go further than the proposed legislation sets out in ensuring that any ambition to eradicate child poverty is clearly translated into actions which must be undertaken by future Scottish Governments, local

authorities and their community planning partners, and all those upon whom any responsibility will be placed for ensuring child poverty in Scotland continues to be addressed.

What are your views on making income targets statutory?

It is our opinion that income targets should be statutory to ensure that clear and quantifiable measurements of progress are in place, which will enable current and future Scottish Governments to identify what advancements in eradicating child poverty have been made. However, we believe that any assessment of child poverty should not be done by focussing on income alone as a measurement of disadvantage and lack of opportunity, and that an apparatus of wide ranging indicators is necessary to highlight child poverty and its effects with consideration of all such indicators an essential part of any child poverty assessment.

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

We believe the Ministerial Advisory Group on Child Poverty should continue to play a key consultative and advisory role in the development of this legislation, as well as those associated strategies and policy frameworks designed to address child poverty. Drawing on the opinions, experiences and expertise of those various key stakeholder organisations and bodies, as well as key professionals and practitioners, is essential in ensuring both objectivity and independence of any advice provided which supports and guides the development of this legislation. We believe this should be done through regular consultation meetings which encourage constructive discussion around how best the legislation can be developed, ensuring due consideration is given to all aspects of proposed statutory obligations around child poverty income targets, and what this will mean in practice.

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.

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

We believe a greater and more coordinated focus needs to be achieved to ensure national and local implementation of the Child Poverty Strategy for Scotland is done effectively, and that there are significant advantages in taking a strategic approach to reducing child poverty across local authorities and community planning partnerships. We are encouraged by the Scottish Government's desire to ***“work closely with local authorities, COSLA and other public, third sector and community stakeholders, to strengthen the relationship between national policy and local action”***. Both local authorities and their community planning partners are responsible for the development and implementation of policy which greatly impacts upon levels of poverty, such as education, childcare and certain welfare payments. Therefore, ensuring there is a greater strategic focus on tackling child poverty will ensure more accountability and transparency across all agencies, local authorities and the Scottish Government. Such

a coordinated strategic local approach can also help to achieve national targets, through imposing a duty on local authorities and their community planning partners to reduce child poverty locally and to produce annual reports which identify what progress they have made in meeting these targets. While it is clear that some local authorities are doing significant work to address child poverty, it is also true that a lack of strategic oversight has ensured an inconsistent approach from one local authority to the next and therefore greater clarity and guidance around a universal approach must be developed as part of the current strategy, alongside the development of the legislation. We do not believe it would be helpful or productive to expect individual local authorities to produce their own child poverty strategies, but that all local authorities should be guided by the national strategy in relation to child poverty when developing their own local strategies through Single Outcomes Agreements, Local Outcome Improvement Plans and Children's Services Plans, ensuring there is a focus on how these can support national targets. This can be achieved through setting out clear expectations and obligations for all local authorities and their community planning partners within any future strategy to ensure cohesion of purpose within one strategy to reduce child poverty, and underpinned by child poverty income targets within legislation. However, we also believe that in setting out expectations and obligations for local authorities and their community planning partners in the aim of addressing child poverty locally, this can only be done effectively with strategic leadership from the Scottish Government providing clear guidance around best practice, as well ensuring all and any necessary resources are available to local authorities in meeting those expectations and obligations.

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?

We welcome the proposed four income based measures of poverty laid out in the Scottish Government's consultation and are aware that these are robustly evidenced and widely acknowledged outside of Scotland as effective methods of assessing and measuring child poverty. As the UK Government itself previously identified in 2012, key stakeholders strongly support such measures – as proposed in the Child Poverty Bill – and that income poverty and material deprivation should be the focus of child poverty measurement. It is therefore concerning that the current the UK government, through repealing the Child Poverty Act 2010 and introducing new "life chances" measures of poverty contained within the Welfare Reform and Work Bill, has chosen to ignore this accepted wisdom and has instead revised its measures of child poverty by focusing on worklessness and educational attainment. Whilst both worklessness and educational attainment are inherently linked to child poverty they represent only two aspects of a much wider range of factors that need to be comprehensively addressed in order to meaningfully tackle child poverty. Through narrowly focusing on only these two issues they also fail to acknowledge the challenges faced by families and households who represent the "working poor", with two out of every three poor children live in working households. Therefore, the Scottish Government's approach to addressing child poverty is a welcome one, as only through ensuring families and households across Scotland maximize their income and financial capacity can meaningful progress be made to reducing financial, and therefore societal, inequalities which continue to impact on the wellbeing of children.

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

We welcome the Scottish Government's acknowledgement that ***"there is very strong support for the existing measures, and near universal support for keeping income poverty and material deprivation at the heart of poverty measurement"***. We understand that the baseline child poverty target of fewer than 10% of children living in relative poverty is recognised internationally as both realistic and achievable, and welcome the proposal to set their target at this level. However, we also believe that, even if these targets are achieved, that 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.

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?

It is our opinion that the Scottish Government should certainly set their income based targets on an after housing costs (AHC) basis. Housing costs are a necessary and significant outlay in relation to any family or household budget and should not be considered inconsequential; as the Scottish Government itself highlights ***"housing is an essential expense for most people, and those on a low income have to compete in the same housing markets as their peers"***. Determining a family's income AHC gives a true indication of what financial resources they then have available for other essential household costs, such as energy and food, and therefore any child poverty assessment measure, such as those proposed within the Child Poverty Bill, will accurately reflect the level of hardship a family is experiencing and whether children are experiencing poverty.

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

We believe that the Scottish Government's proposal to set targets which they aim to achieve by 2030 is both realistic and achievable. Whilst the UK Government may previously have stated its ambition to eradicate child poverty by 2020, an ambition which they have now abandoned with the repeal of the Child Poverty Act 2010, it would be impracticable to expect the Scottish Government to continue towards such a target in the absence of the necessary economic powers which are the reserve of the UK Government only. However, with the introduction of those new devolved powers introduced to the Scottish Parliament through those provisions contained within the Scotland Act 2016, there is a significant opportunity for the Scottish Government to implement further measures which can aid their capacity to meet those identified child poverty targets by 2030. The introduction of a new Scottish social security agency should provide an opportunity for welfare reform in Scotland that offsets the worst effects of the current punitive UK Government welfare system, and in doing so support the Scottish Government's targets to be achieved by 2030. We believe that any new welfare powers should be exercised in a meaningful and properly resourced way to enable social mobility and to tackle child poverty; as highlighted by research conducted by the Child Poverty Action Group (CPAG), who identified that by topping up child benefit payments by five pounds per week child poverty in Scotland could be reduced by 14%ⁱ.

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?

We welcome the proposal that Scottish Ministers will be required to produce a Child Poverty Delivery Plan every five years, as well as be required to report on this plan annually. We feel that insisting upon this as a statutory duty will help to maintain focus for current and successive Scottish Governments on their progress in achieving the identified targets by 2030. With the production of a new Child Poverty Delivery Plan every five years there will be an opportunity for review and assessment of the previous delivery plan, and also an opportunity to set interim targets to be achieved by the end of each five year period which can support the overall achievement of those targets to be achieved by 2030. Insisting that each delivery plan is reported on annually will provide accountability and transparency in relation to the Scottish Government's identified duties and obligations within the legislation, as well as ensure oversight and scrutiny of what progress is being made in achieving child poverty targets. However, as the Scottish Government itself confirms "**tackling the issue comprehensively will require serious long-term commitment and clear and stretching goals**", and therefore any Child Poverty Delivery Plan must provide a clear and agreed outline of what is intended to be delivered over each five year period.

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?

Aberlour does not have any expertise in the development of child poverty measures, and therefore feel we are not in a position to comment.

Do you have any additional views on a Child Poverty Bill for Scotland?

The introduction of a Child Poverty Bill which aims to embed within legislation identified duties and obligations on current and successive Scottish Governments, local authorities and their community planning partners, and any other relevant agencies, is a welcome development which displays a commitment from this Scottish Government to realise its ambition of eradicating child poverty. We fully support the Scottish Government in their attempts to address child poverty, and feel that such a legislative development is a significant step towards achieving that aim. However, child poverty is a complex and multifaceted issue and will not be addressed through a legislative framework alone. The "Pockets, Prospects and Places" approach identified by the Scottish Government in their Child Poverty Strategy for Scotland 2014-17 understands that in order to eradicate child poverty there requires strategic focus and coordination from the Scottish Government, working in partnership with local authorities to ensure income and resource maximisation for families and households, improved life chances for children living in poverty and well designed, sustainable homes for families with low incomes to live in. Consequently, it is our opinion that any provision within the Child Poverty Bill must seek to embed those identified principles, as well as the required duties and obligations of Scottish Government and local authorities to achieve them, within the legislation.

We would also like to highlight concerns around the current provision of free child care places across Scotland. It is our experience that significant numbers of families are missing out on their entitlement to free child care provision as a result of the inflexibility of the current system, which does not allow for alternative arrangements for such provisions in circumstances where a family's situation prevents them from accessing child care through local authority or private placements. We feel this can impact upon families whose household incomes are already stretched, and who are entitled to free child care places but are unable to access them, and presents a further hidden cost to low-income families.

Furthermore, it has been projected that child poverty is due to increase in the UK by up to 50% (AHC) by 2020ⁱⁱ, as a consequence of the cuts to and decrease in value of social security and welfare payments. Therefore, we believe this should compel the Scottish Government to ensure that those provisions contained with the Child Poverty Bill include clear and coherently defined actions, duties and obligations which ensure all levels of government, and any other relevant agencies, work together effectively, so as to mitigate this projected increase and ameliorate the life chances of those children in Scotland experiencing poverty.

ⁱ Based on figures produced Keung, A. and Bradshaw, J. (2016) Analysis of the impact of increases to child benefit and child tax credits on child poverty rates in the UK and Scotland, March 2016:

www.york.ac.uk/inst/spru/pubs/pdf/CB&CTCtopups.pdf

ⁱⁱ Living Standards, Poverty and Inequality in the UK: 2015-16 to 2020-21. Table B2: Relative Poverty: 2007/08 to 2020/21. <http://www.ifs.org.uk/uploads/publications/comms/R114.pdf>