

## Glasgow Centre for Population Health

### Response to the Scottish Government consultation on the Child Poverty Bill for Scotland

The Glasgow Centre for Population Health (GCPH) welcomes the opportunity to provide comments on the proposed Child Poverty Bill for Scotland. We value the commitment to eradicating child poverty by enshrining this ambition in legislation.

Our response is set out under the question headings in the consultation document, with additional comments included at the end. Where appropriate, we draw on supporting evidence from GCPH and other relevant work.

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

Yes – we are very supportive of enshrining in statute an ambition to eradicate child poverty. Given the evidence accumulated by the GCPH, it is our position that child poverty is detrimental to individual and population health and wellbeing, to society, and contributes to inequalities across the life-course.

This is an important step in ensuring continuity of effort and measurement of progress in working towards this goal. As a general observation, we feel that the human aspect of poverty should be acknowledged and threaded throughout the Bill, by aligning it with the expressed values in the social security consultation around dignity, compassion, respect and humanity.

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

1. 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<sup>1</sup>. Work is an important cause of, and solution to child poverty. In terms of measures of income on health, a Joseph Rowntree Foundation systematic review of the relationship between income and health reveals a distinct and significant effect of parental income on children's social, emotional and cognitive outcomes, and to some extent on physical health<sup>2</sup>.

Income as a determinant of health inequalities was also highlighted in an NHS Health Scotland health inequalities policy review, which outlined the principles of effective interventions to address the fundamental causes of health inequalities, and centred around policies that redistribute power, money and resources<sup>3</sup>. Some of the key actions highlighted were:

- ensuring welfare systems provide sufficient income for healthy living

- ensuring welfare systems reduce stigma for recipients through universal provision in proportion to need
- linking of services for vulnerable or high-risk individuals (e.g. income maximisation welfare advice for low-income families linked to healthcare).

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

We are pleased to see that the Ministerial Advisory Group comprises representation across a broad range of sectors. However, there is a lack of private sector representation in the Group which should be addressed, as the measurement framework includes a number of measures of relevance to the private sector, such as the 18.2% employment rate gap between the most deprived areas and elsewhere. Private sector employment accounts for 79.1% of total employment in Scotland – the highest proportion to date<sup>4</sup> and, therefore, it is important that the Group reflects the current labour market landscape. This is particularly important given that almost half of those living in poverty in Scotland live in a household where at least one person works<sup>5</sup> – the phenomenon known as ‘in-work’ poverty. With work being both a cause and solution regarding child poverty, the role of the private sector will therefore be key to ensuring that action on child poverty is prioritised.

We also recommend clearer, more explicit links across the different sectors represented in the Ministerial Advisory Group, and with the Scottish Government to support the alignment of decisions across all appropriate agencies to ensure consistency of actions across delivery partners and policies.

The Group’s role could also be developed to help embed a focus on child poverty across all Scottish Government directorates. There could also be a role for the Ministerial Advisory Group in linking with local drivers of action associated with the Delivery Plan for monitoring and/or reporting purposes, such that the Group receives annual updates of local plans and strategies and reports on them to maintain oversight of how local plans are aligned with national strategies.

**Question 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? (may include reporting and sharing best practice or developing new strategic approaches)**

Translating policy into practice will be a key aspect of eradicating poverty. Implementation of policies will depend to a great extent on resource allocations and on where accountability lies, whether at local or national level. It would be helpful to clarify, at national level, what the macro, meso and micro levers are for implementing the Plan in order to facilitate action by local partners to support it. For example, there is wide variation in the current school clothing grant allocation across local authorities in Scotland<sup>6</sup>, so it would be important to make explicit the proportion of resources allocated to implement the goals outlined in the Bill. This will also apply to free school meals, financial inclusion and a range of locally delivered

strategies, which vary in approaches and outcomes across local authorities. Equally, it is important to link available evidence with the targets, which allows all partners to see actions that can make a difference to addressing particular problems.

Additionally, we would welcome a coherent approach to monitoring actions that is integrated nationally and locally, with a level of reporting at local authority level to monitor progress, to ensure alignment with existing local poverty strategies, and allow comparability of outcomes. Some examples of local poverty work in Scotland include:

- The Poverty Leadership Panel in Glasgow<sup>7</sup> which developed an action plan covering six existing headline themes under which action on poverty is being progressed by a range of organisations and people directly affected by poverty. These include challenging the impact of welfare reforms, reducing child poverty, work and worth, credit and debt, challenging negative attitudes to people in poverty, and involving people with direct experience of poverty.
- Renfrewshire Tackling Poverty strategy (2015-17)<sup>8</sup> which highlights action around maximising income and access to employment, financial capability, improving physical and mental health, closing the educational attainment gap, creating affordable and desirable neighbourhoods and ensuring inclusive, effective and evidence-based organisational working.
- The Employability and Tackling Poverty approach in Fife that operates a holistic and integrated approach through existing services<sup>9</sup>.

**Question 5. What are your views on income-based measures of poverty for Scottish child poverty targets? Are there any additional income-based measures you think we should also use and why? Are there any alternative approaches to measuring income you think could apply to Scotland?**

The current statutory mechanism for tackling child poverty – the Child Poverty Act 2010 – was enacted to “define success in eradicating child poverty and create a framework to monitor progress at a national and local level”<sup>10</sup>. We fully support the commitment to retain income-based measures of poverty which will provide continuity of measurement and facilitate comparisons across the socioeconomic gradient. The relative measure, in particular, is internationally recognised which allows comparisons across different geographies.

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. A recent speaker, Jonathan Morduch, at a GCPH seminar<sup>11</sup>, argued that “the annualised data typically collected fails to capture the realities of the inherent volatility of life on a low income. Households on the lowest incomes get by day-to-day and week-to-week and these fluctuations that take place across the course of a year are lost or ‘smoothed out’ when we examine annual data alone<sup>12</sup>.” Morduch found that stable income was prized over climbing the career ladder, which is an important message in the context of the current precarious nature of work.

We would like to see an additional measure of poverty that reflects inconsistency of income. This might be measured as a 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.

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

We believe that the levels at which the targets are set are ambitious and very challenging. Given that some households are falling into relative poverty on more than one occasion a year, we would reiterate our suggestion of having a target to reduce this. It is also important to capture the impact of external factors on child poverty rates, such as wider issues of global economic shocks, welfare reforms etc to enable a more sophisticated understanding of the macro, meso and micro drivers. As mentioned in Question 4, this would help all partners to see how they can contribute to the goal of eradicating child poverty.

**Question 7. What are your views on the Scottish Government's proposal to set targets on an 'after housing costs' basis?**

We agree that the 'after housing costs' measure is most appropriate. Using figures before housing costs gives a lower rate of poverty due to the high costs of housing. Using the 'after housing costs' measure more accurately denotes household income when differential housing costs have been accounted for. This measure is used by the Campaign to End Child Poverty when referring to the total number of children living in poverty across the UK<sup>13</sup>.

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

We are in agreement with the timeframe in which to achieve the targets. As per Question 9, it will be important to have annual reports on the direction of travel and key indicators.

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

We support annual reporting on the Child Poverty Delivery Plan in terms of direction of travel and key indicators. However, given the national focus on the early years, which is a relatively short timeframe, we believe that a more appropriate review period for the Delivery Plan is every three years, instead of every five years. Evidence shows the critical importance of early years development and suggests that rapid brain development in the first two years of a child's life provides the foundation for their future health and wellbeing<sup>14</sup>. Children aged five from the poorest fifth of homes are on average already over a year behind in their expected educational milestones<sup>15</sup>. Therefore, the timely capture of influences on child

development is important. Ideally, there should be annual reporting against targets nationally and locally (at local authority level) to give an indication of trends.

**Question 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?**

We welcome the comprehensive set of indicators outlined in the measurement framework. In general, however, we feel there is an imbalance between the three themes and would suggest some additional measures under 'Pockets'. For example, there is no measure of debt or financial assets. For this measure, the existing Scottish Government's Wealth and Assets in Scotland Survey 2006 – 2012<sup>16</sup> could be repeated to link in with the proposed 'three year child poverty delivery plan'.

Additionally, we would like to see a childcare measurement, perhaps the proportion of 2-4 year old children attending an early learning/childcare establishment at local authority level by deprivation quintile/decile. This would pick up progress towards the Scottish Government target of increasing current free entitlement from 600 to 1,140 hours per annum by 2020, and would be important in giving a sense of uptake across the socioeconomic gradient<sup>17</sup>. Under 'Prospects', the measure of children who eat five portions of fruit and vegetables a day is likely to be a function of a multitude of factors, including the local availability, accessibility, quality and cost of affordable healthy food<sup>18</sup>. An alternative tangible measure would be having no requirement for foodbanks by 2020.

We do not feel that the measure of children who find it easy to talk to their mother tells us enough about the child's prospects. Nor does it take into account the role of fathers in parenting<sup>19</sup>. "Attachment is fundamental to a child's health and wellbeing, but there is a risk that a narrow focus on attachment can lead to a sole focus on the role of mothers<sup>20</sup>. Therefore a focus on a child's attachment with their primary care givers should be placed alongside an appreciation of the impact of structural inequalities, and the wider range of people in children's lives, including the influence of nurseries and schools"<sup>21</sup>.

Links should also be made to the Children and Young People (Scotland) Act 2014<sup>a</sup>.

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<sup>a</sup> Children and Young People (Scotland) Act 2014: <http://www.cypcs.org.uk/policy/children-young-people-scotland-act>

Service providers now have a statutory duty to embed the principles of the United Nations Convention on the Rights of the Child<sup>b</sup> in all of their services for children and young people using Getting it Right for Every Child (GIRFEC) as the strategic policy framework<sup>c</sup>. A set of eight 'SHANARRI' indicators are associated with the underpinning principles of GIRFEC – these comprise *safe, healthy, achieving, nurtured, active, respected, responsible and included*. Two relevant indicators that could be employed as part of the measurement framework are 'nurtured' and 'included'<sup>22</sup> as child poverty directly impinges on these.

As being a lone parent is a significant risk factor for child poverty, we would also suggest adding a measure for lone parents around managing financially/social support. The Scottish Household Survey contains a question to this effect<sup>23</sup>.

Under Places, we suggest adding fuel poverty measures, such as reducing the number of households living in fuel poverty. According to the Scottish Housing Condition Survey 2012-2104 (now part of the Scottish Household Survey), 35% of households in Scotland were in fuel poverty in 2014.

### **Additional views and observations**

In Section 3, we note the broad range of policies and approaches already in place to help tackle child poverty and would like to share some observations on these:

- The Scottish Government policy on Universal Free School Meals (UFSM) has been widely welcomed and, according to a Health Scotland evaluation<sup>24</sup>, had unintended positive consequences for families who were on low income but did not previously qualify for UFSM. However, it is important to bear in mind that free school meals are available only to children from P1 to P3, which can place additional burdens on families when children move into P4. Therefore, a universal approach to FSM provision would help low income families.
- We strongly endorse the expansion of funded early learning and childcare as evidence suggests that the lack of affordable childcare is one of the biggest barriers to ensuring that work pays<sup>25</sup>. A presentation at the GCPH Glasgow's Healthier Futures Forum on Child and Family Poverty in 2011 argued that this is one of the reasons that Scandinavian countries have less child poverty than in Scotland<sup>42</sup>. For example, it was stated that the UK spends 0.5% of GDP on childcare compared with Sweden's 2%<sup>42</sup>. Additionally, in the 2016 GCPH Seminar Series lecture on poverty, Julia Unwin, Chief Executive of the Joseph Rowntree Foundation (JRF) argued that the prospects for people with responsibilities for caring for children are persistently damaged by the lack of affordable, high-quality childcare<sup>26</sup>.

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<sup>b</sup> United Nations Convention on the Rights of the Child:

[http://www.unicef.org.uk/Documents/Publication-pdfs/UNCRC\\_PRESS200910web.pdf](http://www.unicef.org.uk/Documents/Publication-pdfs/UNCRC_PRESS200910web.pdf)

<sup>c</sup> Getting it Right for Every Child (GIRFEC): <http://www.gov.scot/Topics/People/Young-People/gettingitright>

Therefore, we would also like to see a commitment to improving the quality of childcare as well as number of hours provided, to help address the current variable and inadequate provision of early years care, with an under-skilled and low-paid workforce. Improvements would help to maximise children's development.

- Regarding the Attainment Challenge and the duties outlined in the Education (Scotland) Act 2016, there is scope to enhance these initiatives by applying the evidence-based learning from the Cost of the School Day project, carried out in Glasgow to identify the cost barriers for children to participation in the school experience<sup>27</sup>. Living on a low income affects daily school experiences. The 'Cost of the School Day' research highlighted that costs, policies and practices throughout different parts of the school day place pressure on family budgets and mean that children and young people miss out on opportunities or feel different or excluded because of their family incomes.
- The proposed Best Start Grant is an important benefit for families with young children and care needs to be taken to ensure uptake and consideration of how it will be delivered. Therefore, we suggest that it should be monitored. Evidence from the carefully monitored and evaluated Healthier, Wealthier Children (HWC) project<sup>28</sup> revealed that pregnant women and families with young children were not aware of their maternity entitlements and there was differential knowledge among midwives and health visitors on how to help people claim the Healthy Start vouchers. The HWC referral pathway between early years health staff and money advice services resulted in one in 20 (5%) of families helped by advice services receiving these benefits.
- The HWC project revealed that midwives and health visitors reported previous reluctance to raise the topic of finances with families as they were unsure about what to do with that information. The HWC referral pathways helped staff to broach the subject, knowing that there was somewhere they could refer their patients for help and advice. HWC was also instrumental in highlighting the need for routine enquiry into money worries, which is now included in the refreshed Universal Pathway.
- The HWC partnership approach to income maximisation has been integrated into mainstream services in NHS Greater Glasgow and Clyde and has, since 2010, achieved cumulative financial gains of over £11.7 million for just over 11,000 pregnant women and families who were referred for money advice and help.

**GCPH**  
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<sup>1</sup> Whitham G (UK Poverty Advisor). *Ending Child Poverty: the importance of income in measuring and tackling child poverty. Submission to the All-Party Parliamentary Group (APPG) on Health in All Policies. Inquiry into child poverty and health.* London: Save the Children; 2012.

<sup>2</sup> Joseph Rowntree Foundation. *Does Money Affect Children's Outcomes? A Systematic Review.* York: JRF; 2013. Available at: <https://www.jrf.org.uk/report/does-money-affect-children%E2%80%99s-outcomes>

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<sup>3</sup> Beeston C, McCartney G, Ford J, Wimbush E, Beck S, MacDonald W, Fraser A. *Health Inequalities Policy Review for the Scottish Ministerial Task Force on Health Inequalities*. Edinburgh: NHS Health Scotland; 2014.

<sup>4</sup> Scottish Government. *Scottish Private Sector employment increases*. <http://news.scotland.gov.uk/News/Scottish-Private-Sector-employment-increases-13a5.aspx>

<sup>5</sup> Harkins C, Egan J. *The rise of in-work poverty and the changing nature of poverty and work in Scotland: what are the implications for population health?* Glasgow: GCPH; 2013. Available at: [http://www.gcph.co.uk/publications/456\\_the\\_rise\\_of\\_in-work\\_poverty](http://www.gcph.co.uk/publications/456_the_rise_of_in-work_poverty)

<sup>6</sup> Child Poverty Action Group. *Cost of the School Day*. Glasgow: CPAG; 2015. <http://www.cpag.org.uk/content/cost-school-day-report-and-executive-summary>

<sup>7</sup> Poverty Leadership Panel. <http://www.povertyleadershippanel.org.uk/>

<sup>8</sup> Renfrewshire Council. *Tackling Poverty in Renfrewshire. Tackling Poverty Strategy 2015-2017*. Paisley: Renfrewshire Council; 2015. <http://www.renfrewshire.gov.uk/media/1040/Tackling-Poverty-Strategy-2015-2017/pdf/TacklingPovertyStrategy.pdf>

<sup>9</sup> Employability & Tackling Poverty Learning Network. *Tackling Child Poverty. Fife's Approach*. <http://www.employabilityinscotland.com/media/123770/Fife%20-%20Tackling%20child%20poverty%20through%20existing%20services.pdf>

<sup>10</sup> National Archives, Child Poverty Act 2010, Explanatory Notes, Paragraph 6. <http://www.legislation.gov.uk/ukpga/2010/9/notes/division/3>

<sup>11</sup> Morduch J. *The hidden financial lives of low-income households*. GCPH Seminar; 30 June 2016. <http://www.gcph.co.uk/events/167>

<sup>12</sup> Hilferty D. *We all make mistakes with our finances, but the poorest pay the heaviest price*. Weblog. [http://www.gcph.co.uk/latest/blogs/649\\_we\\_all\\_make\\_mistakes\\_with\\_our\\_finances\\_but\\_the\\_poorest\\_pay\\_the\\_heaviest\\_price](http://www.gcph.co.uk/latest/blogs/649_we_all_make_mistakes_with_our_finances_but_the_poorest_pay_the_heaviest_price) (accessed September 2016)

<sup>13</sup> End Child Poverty. *Child Poverty map of the UK*. [http://www.barnardos.org.uk/130212\\_eccp\\_local\\_report\\_final\\_2\\_.pdf](http://www.barnardos.org.uk/130212_eccp_local_report_final_2_.pdf)

<sup>14</sup> Perry BD. Childhood Experience and the Expression of Genetic Potential: What Childhood Neglect Tells Us About Nature and Nurture. *Brain and Mind* 2002;3:79-100.

<sup>15</sup> Waldfogel J, Washbrook E. *Low income and early cognitive development in the UK*. London: Sutton Trust; 2010. Available at: <http://www.suttontrust.com/researcharchive/low-income-early-cognitive-development-u-k/>

<sup>16</sup> Scottish Government. *Wealth and Assets in Scotland 2006-2012*. Edinburgh: Scottish Government; 2015. <http://www.gov.scot/Publications/2015/03/2333>

<sup>17</sup> Scottish Government. Commission for Childcare Reform's 'Meeting Scotland's Childcare Challenge' report – Scottish Government Response. <http://www.gov.scot/Publications/2015/12/4286/1>

<sup>18</sup> Crawford F. Neighbourhoods and Healthy Nutrition. In: Stock C, Ellaway A (eds). *Neighbourhood structure and health promotion*. New York: Springer; 2013. p305-316.

<sup>19</sup> Scottish Government. *National Parenting Strategy: making a positive difference to children and young people through parenting*. Edinburgh: Scottish Government; 2012. Available at: <http://www.gov.scot/resource/0040/00403769.pdf>

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