

## **Child Poverty (Scotland) Bill: Call for Written Evidence**

### **About Children in Scotland**

Children in Scotland is the collective voice for children, young people and families in Scotland as well as the organisations and businesses that have a significant impact on children's lives throughout the country. It is a membership organisation, comprised of more than 600 representatives from the voluntary, public and private sectors.

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

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

As signatories to the End Child Poverty (ECP) response to this call, we fully endorse the recommendations contained therein, with this response designed to highlight additional information largely gathered from Children in Scotland's project work. It is also informed by Enquire, Scotland's advice service for additional support for learning, managed by Children in Scotland.

### **Whether you agree that statutory child poverty targets should be re-introduced for Scotland? The appropriateness and scope of the 4 proposed targets.**

Children in Scotland welcomes the introduction of the Child Poverty (Scotland) Bill and sees it as an important step towards removing child poverty in Scotland. As indicated in our previous response to the Scottish Government's consultation paper<sup>1</sup>, we agree that statutory child poverty targets are necessary to support the reduction of child poverty, and we view the four income related targets included in the Bill as being appropriate and relevant.

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<sup>1</sup> <http://www.childreninscotland.org.uk/sites/default/files/Child%20Poverty%20Bill%20Scotland%20CiS%20Response.pdf>

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

### **Whether interim targets are needed**

As indicated in our joint End Child Poverty response, we believe that the introduction of interim targets within the legislation is vital in order to measure progress towards the 2030 target at appropriate intervals. This will allow the Scottish Government to assess whether they and other public bodies are on track towards achieving the 2030 target, whether planned approaches are proving effective, and if not, provide the opportunity to adapt or alter these approaches in a timely fashion.

We believe that Scottish Government, expert and public scrutiny of progress towards achieving interim targets will be required in order to build legitimacy. We would highlight the importance of involving children, young people and families in this process, where possible.

### **The proposed arrangements for reporting progress towards meeting the targets and how best to hold the Scottish Government to account**

#### *Delivery plans*

We believe that the production of delivery plans at three yearly intervals is appropriate and provides the opportunity for plans to reflect changing circumstances and contexts.

In line with the ECP response, we view it as essential that actions included in delivery plans are grounded in the evidence of what is known to be effective in terms of addressing child poverty, such as access to affordable housing, childcare and employment. The potential use of Scottish social security powers should also be fully considered. These key policy areas should be outlined in the legislation to ensure they are recognised and prioritised. We are concerned that if omitted, achieving the 2030 target may become less likely.

Alongside a focus on research evidence, we agree that consultation with organisations representing children, young people and families is necessary to ensure that the approaches included in delivery plans reflect the needs and pressures experienced by families experiencing poverty. This should also actively include families where either the parent or child has additional support

needs, in recognition that families where disabilities are present for example, are more likely to experience poverty<sup>2</sup>.

We would also argue that direct consultation with children and young people and families directly themselves would further strengthen these plans.

A rationale for decisions made within the plans should be included to illustrate the theory of change and how it is anticipated that actions will address poverty levels. Independent expert scrutiny of delivery plans will be essential to ensure that actions are appropriate and legitimate.

### *Progress reports*

We welcome the proposed introduction of yearly progress reports, and agree that they should relate directly to delivery plans and describe progress towards targets. Again independent expert scrutiny of these progress reports will be vital.

### **The responsibility placed on local councils and health boards to make local progress reports**

Local child poverty action reports are welcome, given significant role local and authorities and health boards play in addressing child poverty. However we believe at present, along with other ECP members, that currently the legislation is insufficient in this regard, and that local child poverty action report should include forward planning, as well as retrospective reporting. Again, as above, we recommend that these plans are clearly based around the evidence base of effective approaches and interventions, and make reference to local consultation with families, children and young people to ensure plans reflect local need.

### **The existing Child Poverty Measurement Framework and its 37 indicators**

We recommend that the current Child Poverty Measurement Framework is reviewed, and linked more closely with the four income based targets, and evidence base of effective interventions. It is essential that indicators have a direct causal link with poverty levels, we are of the view that currently the link between some of the current indicators is tenuous at best.

As highlighted in the ECP response, we recommend that the legislation makes specific provision for developing this framework.

We also recommend that the measurement framework reflects different inequalities that currently exist within Scotland, such as families with disabilities, mental health problems or other additional support needs, who are

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<sup>2</sup> <http://www.gov.scot/Topics/People/Equality/Equalities/DataGrid/Disability/DisabPov>

at greater risk of poverty. We will be doing children a disservice if action to address child poverty is effective overall, but does not work for particular vulnerable groups.

**Although not in this Bill, the Scottish Government has committed to establishing a national poverty and inequality commission. What should this commission's status and powers be in relation to this Bill?**

ECP members believe there is a need for independent scrutiny of powers outlined in the legislation. This would include scrutiny of development plans, progress reports and progress towards interim targets. The exact membership of this commission will need careful consideration but should include those with a background in child rights.

Fundamentally, it is crucial that children and young people and families, particularly those who are living or have lived in poverty, are involved in scrutinising the effectiveness of legislation, policy and practice. We would therefore strongly urge that any commission 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.

**Further information, please contact:**

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