

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

We welcome the Government's ambition of eradicating child poverty. We share the Concerns of the UN Committee on the Convention on the Rights of the Child regarding the UK Government's decision to repeal significant parts of the Poverty Act (2010). The Scottish Government should develop a progressive approach to reducing child poverty. This will help ensure that the issue of child poverty has a high political profile in Scotland.

We feel there is an opportunity for the Scottish Government to develop a statute that will lead to the eradication of child poverty. The statute should include a practical set of achievable outcomes so that this ambition can be achieved.

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

We support the reinstatement of statutory income targets. There is a direct link between low income families and children's educational, health and wellbeing outcomes. Making income targets statutory will help ensure there is political accountability for reducing child poverty. We look forward to the development of a transformational economic strategy that will demonstrate how these income targets will be met nationally.

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?

A Ministerial Advisory Group on Child Poverty could play an important role in promoting accountability through the monitoring of child poverty levels in Scotland. They could also play a role in highlighting good practice, identifying gaps and commissioning research.

It is difficult to make an informed assessment on the current state of play of the Ministerial Advisory Group because of the limited information available about their activities. For example, the most recent minutes available on the Government's [website](#) were from the 20 August 2014.

We would welcome a discussion on how the Ministerial Advisory Group could develop links locally to help share practice and inform legislation.

4. How do you think links between the national strategy and local authorities could be improved? Do you think that local authorities themselves should be producing strategies or reporting on child poverty activity? Is there anyone else that should be measuring or reporting on child poverty?

There is an opportunity for increased local authority engagement with the national strategy. Local authority child poverty leads could provide a useful conduit to families and communities that experience poverty. These links would enhance the opportunity for those experiencing poverty to have a meaningful input into the development of the national strategy.

Any new local authority reporting requirements should make use of existing community planning reporting frameworks. Midlothian has a child poverty strategy that is subject to scrutiny through the Local Audit Network. Local authorities could play a lead coordinating role in developing measurement frameworks for reporting child poverty. A reporting approach must involve a range of stakeholders such as the NHS, the third sector and faith based groups. It is important that any strategy identifies the range of existing data and uses this as the basis for a reporting structure. Locally we have found it hard to access up-to-date data from the Department for Work and Pensions; it would be helpful if, as part of the Scotland Act (2016) negotiations, this could be reviewed to see if the data could be made more readily available.

- 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?**

We welcome the application of income based measures for Scottish child poverty targets. An additional income-based measure should be the application of welfare sanctions to households with children, and what level of child poverty impact assessment is taken when benefits are reviewed.

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

It will be very difficult to achieve the child poverty target of eliminating relative child poverty without a transformational economic strategy. The targets for absolute poverty, material deprivation poverty and persistent poverty should be set as low as 0%, in order to achieve the Government's policy ambition of completely eradicating child poverty in Scotland. It will also be important to set shorter term targets to help maintain political buy-in and momentum.

- 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?**

The consultation paper considers the key advantages and disadvantages to measuring child poverty on a Before Housing Costs or After Housing Costs basis; we have no further comment at this point.

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

We recognise that eradicating child poverty requires long term planning and appropriate target setting which differentiates between nationally and locally achievable targets. It is also important to develop a robust data collection system and a reporting framework that will enable target setting on a much shorter term basis. Short term targets should be in place to complement the 2030 target; this will help maintain political momentum and accountability.

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?

We would welcome annual Ministerial accountability against a Child Poverty Delivery Plan. It will be important that the Plan can evidence a reduction in child poverty and demonstrate tangible improvements to the lives of children experiencing poverty.

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?

The measurement framework could be improved by including more localised income and employment measures. Reducing the time lag between data being gathered and being made publicly available could improve agencies ability to intervene when children are experiencing or, at risk of significant poverty.

Other health related proxy measures exist that could be used to assess child poverty, for example dental decay amongst children. The focus of the measurement framework should be on the quality, validity and frequency of the data collection.

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

The government should revise 'household income' as the measure for assessing child poverty. A more robust assessment tool is needed to adequately determine the level of poverty a household experiences. This measure should take into account other characteristics such as numbers of resident children, disability, caring responsibilities and household debt.