

**Scottish Government**  
**Child Poverty Bill for Scotland**  
**30 September 2016**

1. The NASUWT welcomes the opportunity to comment on the Scottish Government's consultation on a Child Poverty Bill for Scotland.
2. The NASUWT is the fastest growing teachers' union in Scotland representing teachers and school leaders.
3. One of the most profound and damaging consequences of child poverty is the impact that it has on pupils' educational attainment, their wider wellbeing and their future life chances.
4. The establishment of a purposeful, coherent and integrated approach across Government policies and practices to tackling child poverty and social exclusion must, therefore, be regarded as a fundamental duty of any Government.
5. Teachers and school leaders are acutely aware that poverty is a key inhibitor of educational progress. The NASUWT has undertaken extensive research into child poverty through its annual research on the impact of financial hardship on children and young people and the cost of education.
6. The Union is clear that key to tackling child poverty is:

- the establishment of an effective statutory and regulatory framework for policy development and implementation;
- sustained investment in anti-poverty programmes;
- co-ordinated Government policy on education, health and housing; and
- a welfare system that supports children and families.

## **GENERAL COMMENTS**

7. The UK Government's plans to repeal large sections of the Child Poverty Act 2010 via the Welfare Reform and Work Bill are completely misguided and designed to divert accountability for child poverty from the Government. The UK Government's proposals to replace the four income-based targets with alternative measures for assessing poverty that did not take income into account represents a shift to characterising poverty as a lifestyle choice, rather than addressing the social and economic drivers that cause people to fall into or remain in poverty. Indeed, the NASUWT has made this clear in its responses to UK Government consultations.
8. The NASUWT welcomes the actions of the Scottish Government in securing the repeal of all parts of the Child Poverty Act 2010 that imposed any duty on Scottish Ministers.

## **SPECIFIC COMMENTS**

### **Question 1**

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

9. The NASUWT welcomes the Scottish Government's intention to enshrine its ambition to eradicate child poverty in legislation, but highlights the fact that legislation will be a key lever for change but not an end in itself.

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## **Question 2**

**What are your views on making income targets statutory?**

10. The NASUWT agrees with making income targets statutory.

## **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?**

11. It will be essential that the Group has clear goals and milestones to be achieved to secure progress.

## **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?**

12. 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.
13. It is critical that this collaboration is organised in a way that allows each children's service to discharge their distinct functions effectively and in a way that minimises practitioner workload.
14. The principal contribution made by schools in enhancing the wellbeing and life chances of children and young people relates to their work in providing high-quality learning experiences, as the Scottish Government has itself acknowledged elsewhere.

15. Multi-agency working is too often subject to excessive and unjustifiable local variation in the form that collaboration is expected to take, the way that collaborative arrangements are overseen and managed, as well as the ways in which responsibilities are distributed between different services and agencies. There needs to be a consistent and coherent national approach.
16. Disadvantaged and vulnerable children should be able to benefit from common, minimum expectations of how agencies will work to address poverty and its causes regardless of locality or postcode.
17. The Scottish Government should work with the NASUWT and other relevant stakeholders to develop an effective framework for poverty reduction activity in all local authority areas that addresses the considerations set out above and that permits local flexibility only in circumstances where this can be justified objectively.

#### **Question 5**

**What are your views on the income-based measures of poverty proposed for Scottish child poverty targets?**

18. The NASUWT notes that the proposed income-based indicators identified in the consultation document reflect those used currently in the Child Poverty Act 2010. The NASUWT agrees that combining a range of indicators provides more valid information about poverty and disadvantage than is possible through the use of any single indicator.
19. In light of the widespread support for the current Child Poverty Act indicator set, the NASUWT cannot identify any reason to depart from this approach in the proposed Child Poverty Bill.

## **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?**

20. The child poverty targets proposed by the Scottish Government in the consultation document reflect those established by the UK Government in the original Child Poverty Act 2010.

## **Question 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?**

21. The NASUWT acknowledges the rationale underpinning the proposed use of after housing cost (AHC) indicators in legislation. It is clear that the significant rises in housing costs in Scotland have placed severe pressure on household budgets. Research conducted by the Resolution Foundation has confirmed that households in Scotland have experienced an increase in the proportion of their income spent on housing costs since the mid-1990s, which is greater than any other UK nation or region apart from London and the North-West of England.
22. It is clearly important that the indicators of poverty used in legislation take increased housing costs into effective account and the NASUWT therefore agrees that it is appropriate that AHC measures are used.
23. The NASUWT notes that it is open to the Scottish Government to continue to produce before housing cost (BHC) measures alongside the AHC measures it intends to introduce into statute. While BHC indicators are less valid than AHC indicators for the reasons set out above, they could be retained to provide some potentially useful information for the purposes of international benchmarking.

### **Question 8**

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

24. The NASUWT believes that it is imperative that the Scottish Government takes all possible action within its remit to exert sustained downward pressure on child poverty and its causes. The NASUWT does not accept the 2030 timescale as it lacks ambition and fails to recognise the current dire needs.

### **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?**

25. Five years reflects the political cycle and therefore has a rationale. However, each plan requires key achievement goals and milestones.

### **Question 10**

**Do you have any suggestions for how the measurement framework could be usefully improved?**

26. The current Child Poverty measurement framework has only been in place since 2014. It is therefore too early to establish how effective this framework has been. The NASUWT believes there should be an independent evaluation of its effectiveness.
27. The proposed Child Poverty Delivery Plans may provide an opportunity to audit the effectiveness of the framework and to identify any changes suggested by evidence of its impact.

## **Question 11**

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

28. The NASUWT suggests that the Child Poverty Bill specifically addresses the cost of education and makes provision for regulations which will secure poverty proofing of the school day.
29. The NASUWT 2016 survey of teachers in Scotland shows that 71% of teachers have seen pupils coming to school hungry; 81% of teachers have seen pupils who do not have the correct equipment for lessons; and 79% of teachers have seen pupils who are lacking in energy/concentration due to eating poorly. In addition, the research shows that teachers' are now regularly giving increasing numbers of children money, food, clothes and equipment, at their own expense.
30. In addition, the NASUWT has been conducting since 2011 annual surveys of parents and carers on the cost of education. The results provide evidence of the increasing cost of education through school uniform, stationery and educational visit costs. One of the most disturbing aspects, however, is that, increasingly, parents are saying that they are being forced to pay for educational visits which are an essential or integral part of the curriculum, such as field trips required for qualifications; 16% have had to pay for a trip linked to an exam. Furthermore, there is now more and more evidence emerging that some young people are being forced to reject the subject options they would prefer because their parents would be unable to afford the books, equipment or field trips necessary for the course; 3% of parents say their child had to choose subjects based on equipment costs.
31. The NASUWT suggests that the Bill includes placing a duty on local authorities to work with the NASUWT and other key agencies to regularly review how they are poverty proofing the school day.
32. The NASUWT believes that there should be clear statutory guidance on school charging policies and curriculum access.

Chris Keates

**General Secretary**

For further information on the Union's response, contact Jane Peckham,  
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