

Response ID ANON-Y2FW-WHYJ-A

Submitted to **Consultation on a Child Poverty Bill for Scotland**

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About You

What is your name?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

The Coalition for Racial Equality and Rights

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Page One

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

Yes

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

Yes. CRER believes this will add weight to the commitment to eradicate child poverty and will place an obligation on future administrations to ensure this vision is realised.

However, we stress the importance of considering racial equality issues within this ambition, as minority ethnic communities are twice as likely to be in poverty as white British communities with potential routes out of poverty limited by barriers often connected to racism and structural discrimination.

Race must feature as a key element of this ambition, particularly as:

- Children from non-white minority ethnic backgrounds are significantly more likely to be living in disadvantaged circumstances than white children, with 36% of non-white minority ethnic children living in a household with an annual income in the lowest quintiles compared to 22% of white children.
- The employment rate in Scotland is considerably higher for white ethnic groups (72.0%) than for non-white minority ethnic groups (55.2%) aged 25-49 , despite school leavers from non-white minority ethnic backgrounds having higher levels of attainment than white ethnic groups .
- Clustering in low-paid work is a significant factor in explaining greater in-work poverty among some minority ethnic groups, with non-white minority ethnic individuals with good qualifications facing greater barriers to finding work which matches their qualifications than their white counterparts.
- Non-white minority ethnic groups have a lower-rate of benefit take-up, whether due to lack of awareness of entitlement, stigma, or other factors. However, despite considerable data detailing the connections between poverty and ethnicity, anti-poverty work does not adequately reflect this.

The "Shifting the Curve" report for the First Minister from the Independent Advisor on Poverty and Inequality noted that while minority ethnic groups are often the most disadvantaged and may have additional barriers to face in escaping poverty, there would not be "detailed work on these groups at this stage." This consultation itself makes no references to ethnicity.

It is critical to the ambition to eradicate child poverty that anti-racism and anti-poverty agendas be linked and that the needs and experiences of minority ethnic communities be taken into account. If not, little will be done to address the significant barriers, inequalities, and injustices faced by minority ethnic families and

children living in poverty, and initiatives such as the Child Poverty Bill will not address racial inequality in Scotland.

2 What are your views on making income targets statutory?

What are your views on making income targets statutory? :

While CRER agrees with making income targets statutory, as this may enhance transparency and accountability, the specifics of these targets will be critical to its success. The Scottish Government will need to take into account various issues, such as whether the target will adjust depending on how many children are in a household.

Further detailed consultation will be needed to determine if it is useful to proceed with statutory income targets.

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?

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? :

The Ministerial Advisory Group on Child Poverty could benefit from the inclusion of race equality experts with knowledge of poverty issues and representation from equalities groups, particularly those groups at high risk for experiencing poverty. This would bring an equalities focus to the work of the group and ensure that recommendations benefit all those facing poverty, not only those from majority groups. CRER believes the Group could also benefit from wider stakeholder engagement with equalities groups, as well as from holding meetings pertaining specifically to race and from publishing full detailed minutes of meetings to increase transparency and accountability.

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? This might include reporting and sharing best practice or developing new strategic approaches.

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The local element is significant for initiatives to eradicate child poverty. It is important that national strategies link into local strategies and that the availability and cost of local services (e.g. provision of free school meals, grants for school uniforms, fees for leisure centres, etc.) are considered.

Connections may be able to be improved by linking the national strategy to Local Outcome Improvement Plans, as defined by the Community Empowerment (Scotland) Act 2015. This would allow for local partners to consider national strategies in relation to specific demographics and needs, and plan accordingly.

However, legislation may not be the best place to discuss best practice and delivery. Working groups, networks, and pilot schemes may be useful in determining the best approach.

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 examples of measuring income – for example, as used in other countries - that you think could apply in Scotland?

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 examples of measuring income – for example, as used in other countries - that you think could apply in Scotland? :

CRER is supportive of continuing to use the four measures given in the consultation, as they are widely used and understood and provide a strong baseline for measuring progress and change.

However, it is important to consider equality aspects and disaggregation in relation to the income-based measures and targets. This will help determine which groups are the most at risk and thus, who needs the most support.

Initiatives and policies to drive improvement and progress towards meeting the targets should benefit all groups, and especially the most deprived communities to reduce not only poverty, but income and poverty gaps between groups.

Viewing the measures and targets through an equalities lens is crucial for this.

In this way, using these established measures and targets will also help track increasing or decreasing gaps for equalities groups throughout the years to come. It is important to remember that poverty affects different equalities groups in different ways; the measures and targets should take this into account.

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

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

CRER believes the targets are acceptable, however it is essential that equalities considerations be taken into account when evaluating progress towards these targets and that relevant data is disaggregated.

For example, if the target of fewer than 5% of children being in absolute poverty is achieved, but a disproportionate percentage of these children are from a minority ethnic group, CRER would not consider that the target has been fully met. The targets should seek to change the situation for all children living in poverty, not just the majority population.

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?

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?:

CRER agrees that the targets should be set on an after housing costs basis. In particular, minority ethnic groups are considerably over-represented in private rented accommodation and, therefore, have higher housing costs. This approach will allow for a more accurate view of households in poverty for minority ethnic groups.

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

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

CRER believes aiming to achieve the targets by 2030 is appropriate, but are disappointed that the Race Equality Framework for Scotland 2016-2030 was not mentioned specifically in the consultation document.

As we have stressed previously in the consultation, race is a very important element to consider in the eradication of child poverty given the fact that that minority ethnic groups are twice as likely to be in poverty as white British groups.

We would ask that work to eradicate child poverty also align with the employment, employability, and income actions and goals detailed in the Race Equality Framework and with the Fair Work Framework. Targets in these and other related pieces of work should complement each other.

We also note that poverty does not feature in the Race Equality Framework as much as it could, as its development overlapped with work associated with Fairer Scotland, the Fair Work Convention, and the "Shifting the Curve" report from the Poverty Advisor. As we did not want to pre-empt the outcomes of these complementary areas of work, poverty was not detailed as heavily in the Framework as we would have preferred. However, race did not feature significantly in these pieces of work and as such, a gap persists in relation to the Scottish Government's commitment to tackle the high rates of poverty in minority ethnic communities.

As such, additional consideration will need to be given to race elements in anti-poverty initiatives and additional work will be needed to mainstream equality considerations for minority ethnic groups in relation to child poverty and wider poverty issues that the Race Equality Framework may have missed.

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?

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? :

CRER is supportive of these proposals, but we urge the Scottish Government to ensure that the obligation to produce these reports does not limit the Scottish Government's ability and capacity to act on the Delivery Plan.

However, CRER also asks that an Equality Impact Assessment (EqIA) be published alongside all Delivery Plans and progress reports to ensure that all equalities groups have been considered in the development, delivery, and progress of the Plan.

Additionally, we believe it would be useful to produce a Delivery Plan with specific targets, aims, and actions detailed for each parliamentary term until 2020 to ensure that, regardless of changes to the Scottish Government, the commitment to eradicating child poverty remains strong and consistent.

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?

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? :

CRER believes that the measurement framework, which considers non-economic aspects of poverty, as it stands does not properly explain or detail the situation for minority ethnic children living in poverty.

Often the experiences of minority ethnic children living in poverty differ from that of the white ethnic majority. For example, while minority ethnic groups are twice as likely to be in poverty as the white Scottish/British group, minority ethnic children perform well in school. Indeed, all non-white minority ethnic groups have higher levels of positive post-school destinations than white young people. Even those minority ethnic groups which face the highest levels of poverty have high attainment. This is important to note as poor attainment is not necessarily an indicator of poverty for non-white minority ethnic children and, therefore, initiative to raise attainment will likely not benefit these groups. Additionally, while 62.1% of the poorest children feel accepted by their pupils, this does not account for racism which may hinder feelings of acceptance for minority ethnic pupils outwith the influence of poverty.

Furthermore, two-thirds of those living with income deprivation do not live in a SIMD deprived area, meaning indicators based on SIMD deprived areas primarily concern specific areas and may fail to benefit a significant proportion of those who live in poverty outside these areas.

Significant variations exist across these indicators in relation to education, health, employment rate, apprenticeships, housing, etc. As such, the measurement framework addresses aspects, indicators, and experiences of poverty for those from a white majority ethnic group, but at times neglects those of individuals from a minority ethnic group.

If we use this measurement framework to frame the situation and evaluate success in eradicating child poverty, minority ethnic children and their families are likely to be left behind or have their experiences and realities overlooked.

All measurement frameworks and indicators should be disaggregated for equalities groups as efforts to change the situation for one group may not necessarily

address disadvantage for all groups. Different approaches, initiatives, and tactics will be needed to address poverty for all children; disaggregation of data and measurements is key for this.

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

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

CRER is concerned that this consultation adopted a race-blind approach to the issue of child poverty, considering the fact that minority ethnic families and children are much more likely than their white peers to experience poverty.

However, it will not be enough to simply mention the relationship between race and poverty, but not seek to address these issues.

CRER hopes that a robust and thorough Equality Impact Assessment is published alongside the draft Child Poverty Bill which highlights the different realities, experiences, and challenges faced by equalities groups living in poverty. It is important to recognise that improvements for the majority do not serve as a proxy for improvements for everyone. Specialised and targeted efforts and initiatives will be needed to eradicate child poverty for all groups and will be more effective than adopting a "one size fits all" approach. If policies to eradicate child poverty (and wider poverty) do not reflect the particular barriers faced by minority ethnic individuals, inequality will only perpetuate and grow.

CRER is happy to provide the Scottish Government with information relevant to racial equality that may be useful in the development of the Child Poverty Bill and the associated Equality Impact Assessment.

Relevant reports and publications to consider include:

- Coalition for Racial Equality and Rights. Employment, Employability, and Income Evidence Paper: Race Equality Framework for Scotland 2016-2030.
- Equality and Human Rights Commission. Race Report: Healing a Divided Britain.
- Joseph Rowntree Foundation (2011) Poverty and ethnicity in Scotland: Review of the literature and datasets.
- Joseph Rowntree Foundation (2015) Monitoring poverty and social exclusion in Scotland 2015.
- Joseph Rowntree Foundation (2016). Poverty and Ethnicity: Key messages for Scotland.
- Scottish Parliament Information Centre. SPICe Briefing: Labour Market Update, May 2015.
- The Scottish Parliament Equal Opportunities Committee (2016). Removing barriers: race, ethnicity, and employment.

Evaluation

7 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: