



SCOTTISH GOVERNMENT CONSULTATION ON A CHILD POVERTY BILL

ENGENDER RESPONSE, SEPTEMBER 2016

Engender welcomes this opportunity to comment on the Scottish Government's plans for a Child Poverty Bill for Scotland. We have consistently worked to highlight the inextricable links between women's economic inequality and child poverty, and this consultation response is based on the need to mainstream gender throughout the development of any new legislation. Women are twice as dependent on social security as men, the gender pay gap persists at 14.8% in Scotland,¹ 62% of workers that earn below the living wage are women,² and pervasive violence against women undermines women's access to resources and financial autonomy. Disabled women, black and minority ethnic (BME) women, lone mothers, unpaid carers, and refugee and asylum seeking women, amongst other groups are particularly at risk of poverty due to their gender and other forms of inequality and discrimination. Statistics show that a small majority of women in Scotland live in poverty, but these only take stock of figures for single-headed households and mask the extent of women's poverty due to income inequality within many couple households.

This assumption that resources are controlled and shared equally within the household has a significant impact on child poverty, and undermines a number of related Scottish Government initiatives to reduce both gender inequality and socioeconomic disadvantage. Furthermore, evidence shows that main carers within a household, who often have less access to resources and are predominantly women, spend more on children.³ Women still tend to manage household budgets and therefore act as managers of poverty. The issue of child poverty is manifestly gendered.

The Scottish Government's 2010 Child Poverty Strategy does recognise some of these links between women's economic inequality and child poverty. Its context-setting chapters highlight the number of women in 'in-work poverty' due to combining caring roles and low-paid part-time work, and the need to tackle root causes of the gender pay gap such as gender stereotyping and occupational segregation. However, the subsequent approach and commitments set out are gender-blind.

¹ The pay gap is 14.8% for combined hourly rates, and 33.5% when comparing women's part-time hourly rate to men's full-time hourly rate. Women are 75% of the part-time workforce in Scotland.

² Resolution Foundation (2013) *Beyond the bottom line: The challenges and opportunities of a Living Wage*

³ Women's Budget Group (2005) *Women's and children's poverty: Making the links*

Whilst welcoming this proposed legislation on child poverty, anti-poverty organisations in Scotland have also called for a holistic anti-poverty strategy that covers all groups and ages. We support this, and would add that targeted policy responses also need to take stock of gendered dynamics within the family. In the meantime, any renewed effort to tackle child poverty in Scotland should mainstream gender issues, and other forms of inequality, throughout the development of legislation and beyond.

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

Engender agrees with the principle of a statutory commitment to eradicate child poverty, which is clearly an essential aim. We are concerned, however, at how this will be achieved if attention is not given to the gendered dynamics of poverty and inequality, and how these play out within households. The links between women's economic inequality and child poverty are well-established, yet this consultation document is gender-blind. An intersectional anti-poverty strategy, linked to gender and other forms of inequality, is sorely needed. As such, we believe that this should be reflected in child poverty legislation and regulations.

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

Engender was extremely disappointed that the UK Government abandoned the targets set out in the Child Poverty Act 2010, and welcomes the Scottish Government's decision to reinstate them. We support statutory income targets, as well as CPAG Scotland's proposal for an accompanying duty on Scottish Ministers to meet those targets within the Bill. Along with others, we also recommend that interim targets and robust monitoring mechanisms are introduced.

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?

Given the links between women's and children's poverty, we believe that women with experience of poverty should be included on the advisory group, alongside organisations with expertise on gender equality and intersectionality. Appointments should reflect the fact that women from BME communities, disabled women, unpaid carers, lone parents, and refugee and asylum seeking women all experience higher rates of poverty than others, and face particular barriers to accessing resources that have a significant impact on child poverty.

Progress against statutory targets under the UK Child Poverty Act 2010 was monitored by the independent Child Poverty and Social Mobility Commission. In addition to the Ministerial Advisory Group, for which there is a clear need, we support the creation of a statutory independent body, or the legal empowerment of the proposed Poverty and Inequality Commission to help drive change. In line with the need for a holistic anti-poverty

approach, we believe this body should have a broader focus than the Child Poverty and Social Mobility Commission. As above, women with experience of poverty should be represented on such a body and gender mainstreamed in its remit.

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.

A gendered national strategy that is well linked to Scottish Government commitments regarding women's equality should be reflected in local implementation plans. For instance, the work of the new advisory council on women and girls, which will have a particular focus on occupational segregation, will have significant implications for local authorities, public bodies and services that are delivered locally. Equally Safe,⁴ the Scottish Government's strategy to tackle violence against women, will be implemented by a wide range of public sector actors, including Health Boards, Police Scotland, Sheriff Courts, and Community Planning Partnerships, that operate at the local level. Ensuring that these programmes are integrated with new initiatives to tackle and report on child poverty will be vital.

Similarly, tackling poverty necessitates an integrated approach that cuts across government, both horizontally and vertically. The Child Poverty Act must sit within a broader, gendered anti-poverty strategy that links national policy with key markets such as childcare and housing, and with local implementation. This could be driven by Scottish Parliament enactment of the socio-economic duty contained within the Equality Act 2010, which would require public bodies to make poverty reduction a core function of all decision-making. This commitment was set out in the Scottish National Party's manifesto for the Holyrood elections 2016, and we encourage the Scottish Government to now fulfil that commitment.

In order for local authorities and others to successfully meet any new duties linked to child poverty targets, statutory or otherwise, related resources and support must also be made 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?

Engender supports the use of the income-based targets proposed in the consultation document. Clearly it is essential that income remains at the centre of our measurement and reporting of poverty, and anti-poverty organisations in Scotland believe these four measures provide the best way of doing so.

⁴ Scottish Government (2015) *Equally Safe: Scotland's strategy for preventing and eradicating violence against women and girls*

Of course, poverty is not only about income and is fundamentally about experiences, including those that are shaped by gender. One measurement tool which is widely promoted by feminist economists and gender advocates is time-use surveys, which shed a light on women's time poverty and thus restrictions with regards to the labour market, training, education and other income-generating activities. In the UK, the 2000 Time Use Survey was the first and last large-scale study of its kind, designed to feed into the Europe-wide initiative the 'Harmonised European Time Use Survey'.⁵ In various OECD countries, time use data is routinely collected to measure work-related activities, unpaid work, care work (separated out from other unpaid domestic work), personal care, leisure, and unspecified time.⁶ To supplement income-based measures of poverty, we recommend the introduction of a Scottish Time Use Survey.

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

Engender takes a lead from the End Child Poverty coalition in supporting the Scottish Government's targets for 2030. They believe that the headline target of 10% by 2030 is realistic and achievable, but that this must sit within a wider and further-reaching ambition to eradicate child poverty. We believe that the strategy and delivery plan that sit beneath legislation must be robustly gendered if these targets are to be achieved.

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?

Anti-poverty organisations are clear that relative income targets should be calculated after housing costs, and we support this view. It is worth noting once more, however, that whether calculated before or after housing costs, the focus on household income masks inequality of access to resources between couples, and assumed levels of spending on children in some cases. We recommend that Scottish Household Survey methodology is developed to collect and publish data that allows more accurate analysis of women's incomes.

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

We support the position of anti-poverty organisations, including The Poverty Alliance and CPAG Scotland, that this timeframe is appropriate but that interim targets should also be set out in legislation.

⁵ ONS (2001) *An introduction to the UK Time Use Survey from a labour market perspective*

⁶ OECD (2014) *OECD family database: Time use for work, care and other day-to-day activities*

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?

The proposal to produce a Child Poverty Delivery Plan alongside annual reporting requirements is welcome. Again, we echo comments made by the End Child Poverty coalition, that such a delivery plan must be adequately resourced, and clearly set out detailed areas of responsibility and action. As per our comments above, gender equality issues should be mainstreamed throughout development of these processes.

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?

Gender inequality is an underpinning factor in the experience of poverty, yet this is not reflected in the current measurement framework. So too is inequality more broadly, something which the Scottish Government now has additional capacity to address with new tax-raising powers. We believe that efforts to tackle poverty and different forms of inequality must be much more integrated than at present. We accept the challenge of anti-poverty organisations that the framework should be more tightly linked to maximising household income and that some of the current indicators are not directly relevant to poverty reduction. Nonetheless, it is our view that measurements linked to inequality should also be included. These could include indicators on maternal employment and wages, occupational segregation, and income levels of those on social security entitlements that have been devolved to the Scottish Parliament.

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

As referenced throughout this consultation response, there are numerous existing and overlapping Scottish Government policy areas within which a Child Poverty Bill for Scotland must be situated. Commitments and strategies related to women's equality are amongst these, including Equally Safe,⁷ action to tackle occupational segregation through a new advisory group on women and girls, the ministerial strategic group on women and work, and plans to invest in the childcare workforce.

The forthcoming Social Security Bill, Scottish social security agency, and package of devolved policies and delivery programmes will also be critical tools for achieving child poverty targets. The Scottish Government has a clear opportunity to reduce women's poverty and therefore child poverty with new powers under the Scotland Act 2016. Women are twice as reliant on social security as men, and we have called for the Scottish Government to provide additional support for low-income women within its new approach to social security. This could be achieved by increasing the adequacy of and/or access to Child Benefit, Carer's

⁷ Scottish Government (2015) *Equally Safe: Scotland's strategy for preventing and eradicating violence against women and girls*

Allowance and the Best Start Grant, and by creating a Destitution Fund.⁸ Evidence shows that investing in poverty and raising income levels ultimately saves the public purse significantly in terms of prevention and the strain on services.⁹ We have also called for the Scottish Government to protect women's access to their own entitlements (including child tax credits) through individual payments of Universal Credit. These policy changes would have a measurable impact on women's income and on child poverty.

FOR FURTHER INFORMATION

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ABOUT ENGENDER

Engender has a vision for a Scotland in which women and men have equal opportunities in life, equal access to resources and power, and are equally safe and secure from harm. We are a feminist organisation that has worked in Scotland for 20 years to advance equality between women and men.

⁸ Engender (2016) *Securing women's futures: Using Scotland's new social security powers to close the gender equality gap*

⁹ JRF (2016) *Counting the cost of UK poverty*