



Measuring Child Poverty: A Consultation on Better Measures of Child Poverty

Consultation Response Form

The closing date for this consultation is: 15 February 2013

Your comments must reach us by that date.

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Please tick if you wan	t us to keep your response confidential.
Reason for confidential	lity:
Name	Mr John Davies
Organisation (if applicable)	Credit Action
Address:	6 th Floor, Lynton House, 7-12 Tavistock Square, London WC1H 9LT

If your enquiry is related to the policy content of the consultation you can telephone: 0370 000 2288 or e-mail: Measure.CONSULTATION@childpovertyunit.gsi.gov.uk

If you have a query relating to the consultation process you can contact the CYPFD Team by telephone: 0370 000 2288 or via the Department's 'Contact_Us' page.

Please select the category that best describes you as a respondent.

Voluntary and community sector	Local authority	Practitioner working with children/families
Central Government	Research body/academic	Public bodies and named partners in the Child Poverty Act
Family/organisation representing families and children	Social enterprise	Other
Please Specify:		
Credit Action is a national f England & Wales No. 110694		ty (registered Charity in
Credit Action empowers peop attitudes and behaviours, to lives. It develops and delivers information and advice on m people and adults. Through citizens every year.	make the most of their s products and services noney matters, in an ap	money throughout their which provide education, propriate way for young
In responding to this consulta 2b, 8, 9, 13a, 14 and 27.	ition we have focused or	n answering questions 1,

SECTION TWO: POTENTIAL DIMENSIONS

1 Are there dimensions, other than those proposed in the consultation document, we should consider for inclusion in a multidimensional measure of child poverty?

Y	es	√ No	Not Sure

Comments:

We do not believe that, in constructing a new measure of child poverty, there is any need to include further dimensions beyond those proposed in the consultation document. Indeed, even within the eight dimensions that the consultation suggests for inclusion in a multidimensional measure, we feel that some are more significant as actual drivers of child poverty than others.

While we recognise that the aim of this consultation is to broaden the debate around child poverty, and see this as a constructive exercise in many respects, we do feel that indicators which reflect the income position of families should retain an important place within the new measurement scheme. In our view, income has a central and deterministic role in defining whether or not families find themselves in poverty. Although factors such as poor housing and education undoubtedly shape children's experience of growing up in poverty, these can arguably be characterised as effects which stem from a deeper underlying cause – lack of sufficient income – which, for example, limits access to better quality accommodation or educational opportunities.

Consequently, we would emphasise the role played by "Income and Material Deprivation", "Unmanageable Debt" (which serves to reduce available income) and to some extent "Parental Skill Level" (where this impacts upon a family's ability to manage its income effectively) as key motors of child poverty. Therefore, we believe there ought to be a core focus on these dimensions within the new measure, rather than seeing an urgent need to incorporate any additional dimensions.

DIMENSION 1: INCOME AND MATERIAL DEPRIVATION

2 a) How should we measure income as a dimension in a future multidimensional measure of child poverty?

Comments:
2 b) How important is relative and absolute income?
Very important Important Slightly important Not important Not sure
Comments:
While the consultation document seeks to move beyond the relative income indicators that have been used up to this point in measuring child poverty, we believe there is value in continuing to track it, and would urge the Government to incorporate relative income into any new measure that is devised.
In particular, relative income indicators help users to monitor the level of inequality in society, which in our opinion constitutes an important component in our understanding of child poverty. The experience of growing up with less than your peers can have a significant impact on children, both in material and psychological terms, and relative income indicators can help tap the incidence of this.
We recognize that as cuttined in the consultation feating on relative income

We recognise that, as outlined in the consultation, focusing on relative income alone can sometimes lead to slightly distorted conclusions. Equally though, we would argue that no indicator, however simple or complex, will ever be perfect, and believe that there is still considerable insight to be gained from considering relative income as part of a multidimensional measure.

In addition, we welcome the fact that this section of the consultation highlights the importance of financial capability, and the recognition that "How families spend their money matters for children" (page 21). While we do not believe that this justifies completely abandoning a focus on income altogether — which we stress again plays a central and deterministic role in child poverty — we feel that financial capability is a significant supplementary concern, and that it could be a valuable part in a multidimensional measure. We make further comment on this in our response to Question 13a.

in our response to Question 13a.
3 How does the ownership of assets such as a house affect our understanding of poverty?
Comments:
4 How can an income dimension in a multidimensional measure of child poverty avoid the drawbacks associated with a simple income threshold?
Comments:

DIMENSION 2: WORKLESSNESS

5 How important is worklessness as a dimension in a futumeasure of child poverty?	ure multidimensional
Very important Important	Slightly important
Not important Not sure	
Comments:	
6 How should worklessness be measured?	
Comments:	

7 Does the length of time for which a household is workless matter for measurement? Not Sure Yes No Comments: **DIMENSION 3: UNMANAGEABLE DEBT** 8 How important is unmanageable debt as a dimension in a future multidimensional measure of child poverty? Very important Slightly important **Important** Not important Not sure Comments: We feel that unmanageable debt plays a highly important role in shaping child poverty, insofar as it acts as to reduce family income, and therefore the amount of money that is available to provide for a child's basic needs. In our view, unmanageable debt is a particularly significant problem because of the "vicious cycle" effect, in that those who struggle to service their debts are often forced to take on additional credit in order to avoid default, adding further to their overall debt burden. Therefore, unmanageable debt not only represents a major drain on a family's income, and consequently on that family's ability to provide for its children, but one that is prospectively persistent and on-going. As such, we believe it represents a key aspect of child poverty that ought to be included in any prospective measure.

9 What aspects of unmanageable debt should we be most concerned about capturing?

Comments:

The consultation document suggests that arrears on current bills and payments are considered to be a strong objective indicator of current financial difficulties (page 26). We very much agree that arrears are an important component of unmanageable debt, but would emphasise that they are not the only one. Debt is a complex problem, and it is important to recognise that even if someone is not yet behind on their bills, they can still be struggling to manage their obligations – indeed, this is often when positive interventions can have the biggest impact.

We therefore believe that, in order to properly reflect the nature of unmanageable debt, multiple indicators will be required to effectively operationalise this as a dimension of any new child poverty measure. In particular, we feel that some kind of debt-to-income ratio would be especially informative.

DIMENSION 4: POOR HOUSING

10 How important is poor housing as a dimension in a future multidimensional measure of child poverty?
Very important Important Slightly important Not important Not sure
Comments:
Comments.
11 What aspect of poor housing should be captured in a measure?
Comments:

child poverty? Comments: **DIMENSION 5: PARENTAL SKILL LEVEL** 13 a) How important is parental skill level as a dimension in a future multidimensional measure of child poverty? Very important **Important** Slightly important Not important Not sure Comments: As an organisation with extensive experience of supporting people to manage their finances effectively, we would draw attention to the role that parents' levels of financial capability can have on child poverty. Credit Action provides a variety of products aimed at helping people to be on top of their money, including a range of advice guides (one of which is specifically aimed at the needs of single parents), online budget planners, and a mobile phone application which enables users to keep track of their spending. This work has given us a particular appreciation of how important an individual's financial capability is to their family's broader standard of living. From a child poverty perspective, we would argue that unless a child's parents have the fundamental skills necessary to manage their family income appropriately, providing for that child can prospectively become very difficult. Indeed, as mentioned in our response to Question 2b, there is a recognition of

12 How can we consider the impact of where children grow up when measuring

this within the consultation document itself, which states that:

"How families spend their income matters for children. Children in families which can budget between paydays, build savings and support their children's education are better off than children in other families which have the same income but struggle to budget" (page 21)

While the consultation argues that a pure income indicator would be unable to capture this, we feel that allying an income indicator to some kind of measure of parental financial capability would yield valuable insights about child poverty.

13 b) What level of skills matter?

14 How can we best capture parental skill level in a new child poverty measure?

Comments:

We recognise that financial capability can be a somewhat difficult concept to measure. The metrics used within the consultation primarily reflect the highest level of qualification that an individual holds, based on the National Qualifications Framework. However, as there are currently no national level tests for financial capability, approaching the concept in this way is not possible.

In our view however, one important component of financial capability is a person's attitude towards money and the importance of managing it. Therefore, some form of attitudinal indicator may provide a useful way in to capturing financial capability, and we believe it is worth exploring this as a possible way of operationalising this aspect of parental skill level.

DIMENSION 6: ACCESS TO QUALITY EDUCATION

15 What impact does attending a failing school have on a child's experience of poverty? Some impact Little impact Significant impact Not sure No impact Comments: 16 What impact does attending a failing school have on a child's life chances? Significant impact Some impact Little impact No impact Not sure Comments:

Comments:	
=	
DIMENSION 7: FAMILY ST	Stability as a dimension in a future multidimensional
measure of child poverty?	stability as a difficultion in a ratars management
Very important	Important Slightly important
Not important	Not sure
Comments:	

19 How important is the long term involvement of both parents to their child's experience of poverty and life chances?
Very important Important Slightly important Not important Not sure
Comments:
20 How important is the presence of a father to a child's experience of poverty and life chances?
Very important Important Slightly important Not important Not sure
Comments:

measure?	iences associated				
Comments:					
DIMENSION 8:	PARENTAL HEA	LTH			
	PARENTAL HEA we recognise your		multidimensio	nal measure o	of
22 How should			multidimensio	nal measure o	of
22 How should child poverty?			multidimensio	nal measure o	of
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23 How should we recognise parental drug and alcohol dependence and mental health conditions in a multidimensional measure of child poverty?
Comments:
24 How can parental disability and general poor parental health be reflected in a multidimensional measure of child poverty?
Comments:

SECTION 3: CREATING A MULTIDIMENSIONAL MEASURE

25 Are there criteria, other than those listed in Section 3 of the consultation document, that we should evaluate a new measure against? No Not Sure Yes Comments: 26 In creating a new measure should any dimension be a gateway? No Not Sure Yes Comments:

27 Should the indicators b choice of weighting?	e weighted and,	if so, what factors	s should influence the
Yes	No	Not Sure	
Comments:			
As noted in our response determinant of whether of in poverty. Consequently bring a wider range of inview those dimensions levels, and parents' all particular priority within a	or not families, a	and therefore chile nly respect the G measurement of ly reflect family of that income,	dren, find themselves overnment's desire to f child poverty, in our or household income
Of the dimensions put for and Material Deprivation (specifically relating to present the dimensions should be given	n", "Unmanagea parental financia t the indicators	able Debt" and ' capability) as co that are selec	Parental Skill Level" entral in this respect,
28 Which indicators should	d be weighted m	ore or less?	
Comments:			

29 How could we measure child poverty at the local level?
Comments:
30 How should we check the robustness and simplicity?
Comments:

31 What would you use a multidimensional measure of child poverty for?
Comments:
32 Please use this space for any other comments you would like to make.
Comments:

etc.).		
Comments:		

33 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply



Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

✓ Yes

All DfE public consultations are required to meet the Cabinet Office Principles on Consultation

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, tel: 0370 000 2288 / email: carole.edge@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 15 February 2013.

Send by post to: CYPFD Team, Department for Education, Area 1C, Castle View House, East Lane, Runcorn, Cheshire WA7 2GJ or email to: Measure.CONSULTATION@childpovertvunit.gsi.gov.uk