



Department
for Education



Department
for Work &
Pensions

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 want us to keep your response confidential.

Reason for confidentiality:

Form completed by:	Brian Wilson (Research Director)
Name	
Organisation (if applicable)	Rural Services Network
Address:	c/o Kilworthy Park, Drake Road, Tiverton, Devon, PL19 0BZ

If your enquiry is related to the policy content of the consultation you can telephone: 0370 000 2288 or e-mail:

Measure.CONULTATION@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.

<input type="checkbox"/> Voluntary and community sector	<input type="checkbox"/> Local authority	<input type="checkbox"/> Practitioner working with children/families
<input type="checkbox"/> Central Government	<input type="checkbox"/> Research body/academic	<input type="checkbox"/> Public bodies and named partners in the Child Poverty Act
<input type="checkbox"/> Family/organisation representing families and children	<input type="checkbox"/> Social enterprise	X Other

Please Specify:

The **Rural Services Network (RSN)** is a membership organisation, which represents around 110 local authorities, 100 other local service providers (fire and rescue authorities, police authorities, health care trusts, housing associations, bus operators, etc) and several thousand community-level organisations (including many parish and town councils). This membership is drawn from across rural England. The RSN is devoted to safeguarding and improving services that serve rural communities. It seeks to represent the views of its membership in order to influence policy, and to share information and good rural practice amongst its membership.

The RSN notes that central Government has made a formal commitment to 'rural proof' all of its policy development. It has said it will think through the rural implications of proposed policy changes and will identify where adjustments are needed to suit rural needs or circumstances. The RSN welcomes this Government commitment (led by the Rural Communities Policy Unit in Defra).

We have not attempted to answer every question, but have focused on those where we have some expertise and points to make.

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?

Yes

No

Not Sure

Comments:

There are higher household costs associated with living in rural areas, which will inevitably impact on levels of poverty. A 2010 study for the Joseph Rowntree Foundation showed that a working age couple with two children living in a hamlet required £72 per week more to achieve the same minimum standard of living as their counterparts in an urban area. This 18% rural premium was mainly accounted for by extra transport costs and heating costs.

Another contextual consideration is that wages earned in rural areas are on average 9% lower than those earned in urban areas. Data from the ONS Annual Survey of Hours & Earnings showed that rural earnings averaged £20,155 whilst urban earnings averaged £21,972. Low wage levels and high living costs can be seen as the backdrop to our comments and are issues which need to be reflected in the Child Poverty Measure.

Fuel poverty has become a high-profile issue and it affects around one in six households, not least because of rapidly rising fuel prices. It is particularly prevalent among those living in areas which are off the mains gas network and who must rely on other means such as heating oil, LPG or solid fuels. Living in a cold or poorly insulated house can have a long term affect on health. There is a widely recognised measure (where keeping a home at a defined level of warmth results in fuel bills that exceed 10% of household income) and one which is tracked and measured by DECC. Indeed, it has been modelled by that department down to a small area level.

Access to pre- or after-school activities is another dimension we would wish to see considered, as this contributes to a child's development and health (fitness, where sport is involved). Where children live further away from school and where public transport options to/from school are lacking this can be a particular issue. Children can miss out on pre- and after-school activities if they have to catch the school bus, which runs only at the start and close of the taught school day. Defra measures household distance to schools, so it should be possible to construct an indicator.

Housing affordability is another highly relevant social issue, with average house prices typically many multiples of the annual average household income. In some areas, where housing markets are constrained and demand is high, this can have a particular impact on lower income households and their children. They are excluded from owner occupation and are more likely to be in private rented accommodation. This can have an immediate impact on a child's wellbeing and a long term affect on its life chances. There are good indicators readily available which measure the relationship between housing prices and household incomes.

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:

It is important that the low income (poverty) threshold chosen is set at a suitable level. That should include those children in households where an adult is on a low wage, as well as those where household income comes solely from state benefits.

2 b) How important is relative and absolute income?

Very important

Important

Slightly important

Not important

Not sure

Comments:

No comment.

3 How does the ownership of assets such as a house affect our understanding of poverty?

Comments:

As noted above, the affordability of housing is a key issue likely to impact on a child's early life chances. High house prices can be a burden, excluding from home ownership many on modest incomes and leading to proportionately high mortgage repayments for many who do manage to join the housing ladder. Where house prices are high, children are more likely to be brought up in private rented accommodation, a sector which has much poor quality housing.

Whilst it is recognised that high housing values can be viewed as an asset for those households who no longer have mortgages to pay off, we do not think this is a suitable or relevant measure to apply to child poverty. It does not represent a realisable value or income: it is money tied up in bricks and mortar. Added to which it is difficult to interpret, since high house prices can equally be seen as a burden (given that a mortgage eats into the available household income).

4 How can an income dimension in a multidimensional measure of child poverty avoid the drawbacks associated with a simple income threshold?

Comments:

It will be important to recognise that there are different costs associated with living in different types of area, so poverty thresholds will be higher in certain places than in others. As noted at question 1, evidence shows there is a particular cost of living premium for those living in small rural settlements, due to additional transport costs to access jobs, services and other opportunities, and typically higher heating bills for housing.

DIMENSION 2: WORKLESSNESS

5 How important is worklessness as a dimension in a future multidimensional measure of child poverty?

<input type="checkbox"/>	Very important	<input type="checkbox"/>	Important	<input checked="" type="checkbox"/>	Slightly important
<input type="checkbox"/>	Not important	<input type="checkbox"/>	Not sure		

Comments:

We have marked this as only slightly important in order to make the point that it is a measure which is misleading in the way it is often measured and interpreted. In rural areas labour markets are much more fluid than in urban labour markets and the distinction between being in-work and out-of-work is less precise. Low income households include a high proportion containing someone in low paid work; wages in rural-based jobs are below national averages, especially in the more peripheral parts of the country e.g. south west peninsular, the Marches and the east coast. It seems likely there will be “negative implications” for children living in low income working households, just as there will be for those living in workless households. We are not aware of any evidence to the contrary.

Additionally, a disproportionate number in rural areas are in insecure or seasonal employment. The fact they may be measured as in work can give a false picture. Again, this type of employment seems likely to create insecurity in the home for children, in just the same way as worklessness.

It is essential that any measure of worklessness is taken at the right point in the year. It must not be taken at a time when seasonal work (in agriculture and tourism) is near its peak. This would be atypical and skew the findings.

Before agreeing a worklessness indicator, DfE and DWP should test how much duplication there is with the planned low income measure. The two may be so closely related that the low income measure is sufficient on its own, already encompassing worklessness issues.

6 How should worklessness be measured?

Comments:

As noted above, if used, it must avoid measurement at peak periods for seasonal work.

It could perhaps include all those who are out of work at any one of some different times during the year.

7 Does the length of time for which a household is workless matter for measurement?

Yes

X No

Not Sure

Comments:

Ticking the 'no' box is perhaps to over-state our view, however it should be noted that seasonal worklessness and regular spells of worklessness can be important factors impacting on a household and its children. They must not be dismissed as relatively unimportant when compared with longer term worklessness.

DIMENSION 3: UNMANAGEABLE DEBT

8 How important is unmanageable debt as a dimension in a future multidimensional measure of child poverty?

<input type="checkbox"/>	Very important	<input type="checkbox"/>	Important	<input type="checkbox"/>	Slightly important
<input type="checkbox"/>	Not important	<input type="checkbox"/>	Not sure		

Comments:

No comment.

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

Comments:

No comment.

DIMENSION 4: POOR HOUSING

10 How important is poor housing as a dimension in a future multidimensional measure of child poverty?

<input type="checkbox"/>	Very important	<input checked="" type="checkbox"/>	Important	<input type="checkbox"/>	Slightly important
<input type="checkbox"/>	Not important	<input type="checkbox"/>	Not sure		

Comments:

No comment.

11 What aspect of poor housing should be captured in a measure?

Comments:

Housing with poor insulation would seem a useful measure, because of its obvious impact upon household expenditure and in many cases on the health of occupants. It is highly relevant to the Government's decent homes standard. SAP ratings are the standard measure of dwelling heating efficiency used.

Indeed, the issue of children in households in fuel poverty (mentioned above) could perhaps be dealt with under the poor housing heading.

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

Comments:

The consultation document indicates that living in a deprived area may have implications. It says that families in such areas may face "additional barriers to accessing services and job opportunities, such as poor transport connections".

In fact it is families living in rural areas who face the worst access to services and job opportunities, and who have the poorest transport connections. Defra's annual publication, *Statistical Digest of Rural England*, shows this very clearly. It is a very serious concern and a dimension to poverty which goes largely unreported and unmeasured. Children in smaller rural settlements cannot easily reach facilities such as youth clubs, after-school opportunities and formal leisure facilities. Many live miles away and with no (or very limited) public transport options. We strongly urge DfE and DWP to include some access indicators to the Child Poverty Measure. We suggested above an access to pre- and after-school indicator. Defra holds various data on access to services which could be explored and used. The DCLG Indices of Deprivation also uses relevant data sets to calibrate its access to services domain.

The inference in the consultation document that living within a deprived area could itself be a measure to use seems wholly illogical. It would introduce double-counting. Other measures to be included in the Child Poverty Measure should instead be analysed to show the extent to which there are spatial patterns such as deprived areas.

Housing estates are essentially a feature of urban settlement patterns, albeit one which can have the effect of sorting households into rich and poor areas. It is important to understand that rural settlement patterns are very different. Research shows that in rural areas the poor are mostly scattered and living next door to more affluent households. This does not make them any better off. Furthermore, it should be noted there are almost as many poor households in rural as in urban areas, but this will not show up on a map of poor or deprived areas because their geography is so different. Where poor and rich live next door to each other there is a statistical averaging effect. The Child Poverty Measure must avoid falling into the trap of simply measuring urban settlement patterns / housing markets (and overlooking rural geographies).

DIMENSION 5: PARENTAL SKILL LEVEL

13 a) How important is parental skill level as a dimension in a future multidimensional measure of child poverty?

<input type="checkbox"/>	Very important	<input type="checkbox"/>	Important	<input type="checkbox"/>	Slightly important
<input type="checkbox"/>	Not important	<input type="checkbox"/>	Not sure		

Comments:

No comment.

13 b) What level of skills matter?

Comments:

No comment.

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

Comments:

No comment.

DIMENSION 6: ACCESS TO QUALITY EDUCATION

15 What impact does attending a failing school have on a child's experience of poverty?

<input type="checkbox"/> Significant impact	<input type="checkbox"/> Some impact	<input type="checkbox"/> Little impact
<input type="checkbox"/> No impact	<input type="checkbox"/> Not sure	

Comments:

No comment.

16 What impact does attending a failing school have on a child's life chances?

<input type="checkbox"/> Significant impact	<input type="checkbox"/> Some impact	<input type="checkbox"/> Little impact
<input type="checkbox"/> No impact	<input type="checkbox"/> Not sure	

Comments:

No comment.

17 How should access to quality education be measured?

Comments:

No comment.

DIMENSION 7: FAMILY STABILITY

18 How important is family stability as a dimension in a future multidimensional measure of child poverty?

Very important

Important

Slightly important

Not important

Not sure

Comments:

It would seem important not to leap to (what could be seen as judgemental) conclusions that certain types of households are inherently linked with poverty.

Otherwise, no comment.

19 How important is the long term involvement of both parents to their child's experience of poverty and life chances?

<input type="checkbox"/> Very important	<input type="checkbox"/> Important	<input type="checkbox"/> Slightly important
<input type="checkbox"/> Not important	<input type="checkbox"/> Not sure	

Comments:

No comment.

20 How important is the presence of a father to a child's experience of poverty and life chances?

<input type="checkbox"/> Very important	<input type="checkbox"/> Important	<input type="checkbox"/> Slightly important
<input type="checkbox"/> Not important	<input type="checkbox"/> Not sure	

Comments:

No comment.

21 Which experiences associated with family stability should be captured in a measure?

Comments:

No comment.

DIMENSION 8: PARENTAL HEALTH

22 How should we recognise young carers in a multidimensional measure of child poverty?

Comments:

From the data presented in the consultation document, this issue seems quite problematic for a Child Poverty Measure. It appears there are simply some probabilities e.g. a higher than average percentage of those with mental health problems are not employed, a higher than average percentage of those with disabilities are on low incomes. It would be a big leap, therefore, to conclude that all children in households with a disabled adult or where an adult experiences mental health problems should be counted under this dimension of poverty. Indeed, the evidence in the consultation document indicates that, despite the higher than average prevalence, most of the disabled are not on low incomes and most of those with mental health problems are employed.

Otherwise, no comment.

23 How should we recognise parental drug and alcohol dependence and mental health conditions in a multidimensional measure of child poverty?

Comments:

No comment.

24 How can parental disability and general poor parental health be reflected in a multidimensional measure of child poverty?

Comments:

No comment.

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?

X Yes

No

Not Sure

Comments:

In addition to the criteria listed, it is essential (in line with the Government's rural proofing commitment) that the new measure works equally well in different geographic types of area. It should not favour social or economic issues more typical of urban areas, at the expense of those more typical of rural areas. Nor should it favour larger settlements and their typical housing markets by trying to measure deprived area affects e.g. on urban housing estates. The Child Poverty Measure must have credibility across different geographies if it is to be useable and widely accepted by stakeholders and policy practitioners.

26 In creating a new measure should any dimension be a gateway?

X Yes

No

Not Sure

Comments:

Arguably, low income should be a gateway measure, since many of the other indicators flow from this. Indeed, many of the other indicators would not be such an issue where there is a good income e.g. fixing poor housing can be afforded and paying off debt is an option.

27 Should the indicators be weighted and, if so, what factors should influence the choice of weighting?

Yes

No

Not Sure

Comments:

There should at least be recognition that some indicators are more important than others and that some may double-count others. Hence, the low income measure could be a gateway and more heavily weighted. Where potential indicators are found to duplicate each other (statistically) there is a case for leaving out the duplicates altogether.

At the same time, there is a case for not overcomplicating the Measure, so it becomes hard for users to describe or understand.

28 Which indicators should be weighted more or less?

Comments:

This could at least be guided by statistical analysis e.g. to find out which indicators double count each other.

29 How could we measure child poverty at the local level?

Comments:

As far as possible indicators should be used which are measurable at below local authority level, so the information is useable to authorities wanting to explore child poverty issues within their area. Increasingly data is available (or in some cases modelled) at ward, postcode and Census output area levels. However, it is recognised that data availability issues will be a constraint and that some compromises will be needed.

It may be that the full measure (using all indicators chosen) is used at the local authority area level, but that only those indicators which are available for finer grained geographies are applied to smaller levels.

30 How should we check the robustness and simplicity?

Comments:

No comment.

31 What would you use a multidimensional measure of child poverty for?

Comments:

Individual local authority members of the Rural Services Network might use the measure to guide their policy development, implementation and monitoring activities. This will inevitably differ from one authority to another.

32 Please use this space for any other comments you would like to make.

Comments:

There would appear to be potential for confusion between this piece of work by DfE-DWP, on the one hand, and the Indices of Deprivation that is maintained by the Department for Communities & Local Government, on the other hand. The Indices of Deprivation is a multi-dimensional measure (covering a range of social and economic issues), so broadening out the child poverty measure beyond its current focus on income brings the two pieces of work into the same territory. In addition to that, DCLG has recently published (December 2012) a 'Children in Income Deprived Households Index'. Government departments will need to explain the difference between these various pieces of work and why different measures or indices are required for different policy applications.

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 etc.).

Comments:

Attempts should be made to reduce the number of consultation questions in future. The questions were relatively clear, if read alongside the consultation document.

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 X

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?

XYes	<input type="checkbox"/>	No
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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.CONULTATION@childpovertyunit.gsi.gov.uk