



Department
for Education

Consultation Response Form

Consultation closing date: 14 August 2014
Your comments must reach us by that date

Consultation on setting the 2020 persistent child poverty target

If you would prefer to respond online to this consultation please use the following link: <https://www.education.gov.uk/consultations>

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.	<input type="checkbox"/>
Reason for confidentiality:	

Name: Mr John Davies	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of Organisation (if applicable): 4Children	
Address: City Reach, 5 Greenwich View Place, London E14 9NN	

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications Division by e-mail: consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the department's ['Contact Us'](#) page.

Please mark the category which best describes you as a respondent.

<input checked="" type="checkbox"/> Voluntary and community sector	<input type="checkbox"/> Central government	<input type="checkbox"/> Research body/academic
<input type="checkbox"/> Social enterprise	<input type="checkbox"/> Local authority	<input type="checkbox"/> Parent/Carer
<input type="checkbox"/> Public bodies and named partners in the Child Poverty Act	<input type="checkbox"/> Practitioner working with children/families	<input type="checkbox"/> Child/Young person
<input type="checkbox"/> Organisation representing families and children	<input type="checkbox"/> Other	

Please Specify:

4Children is the national charity all about children and families. We have spearheaded a joined-up, integrated approach to children's services and work with a wide range of partners around the country to ensure children and families have access to the services and support they need in their communities. We run Children's Centres as well as family and youth services across Britain. We develop, influence and shape national policy on all aspects of the lives of children, young people and families.

1 Do you agree that the Government should legislate for a persistent child poverty target of less than 7 per cent by 2020?

<input type="checkbox"/> Agree	<input checked="" type="checkbox"/> Disagree	<input type="checkbox"/> Neither agree or disagree
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2 If you do not agree, please give your reasons, and set out at what percentage you think the persistent child poverty target should be set at, and why.

Comments:

We believe the persistent child poverty target **should be set at 5% or less**. Children's view is that the target should be set at a level which encourages concerted action to address persistent child poverty as a specific issue, rather than just on the basis of ensuring mathematical consistency with the other child poverty measures (which is one of the primary justifications for setting a 7% target).

Evidence suggests that the experience of being in persistent poverty over a prolonged period of time (rather than just in a particular moment, as measured by metrics such as the relative child poverty indicator) is more damaging to a child's development and outcomes. For example, research published by the Institute of Education in June 2012 used data from the Millennium Cohort Study to assess the impact of poverty, and particularly persistent poverty, on children's cognitive development up until the age of seven. Notably, the study found that "persistent poverty has a larger cumulative negative impact on children's cognitive development than episodic poverty", and added that "For children who are persistently in poverty throughout their early years, their cognitive development test scores at age seven are more than 10 percentile ranks lower than children who have never experienced poverty".¹

Given the particularly negative impact that persistent child poverty can be shown to have, we therefore believe that there is a need for policy to address this problem specifically, and that the target should actively drive interventions in this area. Ultimately, we do not feel that setting the persistent child poverty target at 7% will be sufficient to achieve this, and that the target rate therefore needs to be lower.

As the consultation sets out, a persistent child poverty rate of 7% is the level that would generally be expected if the headline relative child poverty target of 10% were achieved, based on long-run data. However, if the target is set purely on the basis of ensuring internal consistency between the relative and persistent child poverty indicators, then policy measures which satisfy the former would, almost by definition, automatically serve to satisfy the latter. There would, in essence, be no incentive to address persistent child poverty separately to relative child poverty.

Consequently, we feel that the persistent child poverty target should be set at a lower level, at a rate of 5% or less.

We make two additional comments. The first concerns the data used to measure the persistent poverty rate. During a stakeholder engagement meeting that we attended as part of the consultation process earlier this month, an important contribution was made

¹ Andy Dickerson and Gurleen Popli (2012) [Persistent poverty and children's cognitive development: Evidence from the UK Millennium Cohort Study – CLS Cohort Studies, Working Paper 2012/2](#), p. 20

regarding the capacity to measure persistent poverty during the early years. It was suggested that as persistent poverty is based on the experience of poverty over a four year period, if this is measured on an individual basis then it will be mathematically impossible for any child to be classed as being in persistent poverty before the age of four. This is a particularly significant point, as evidence strongly shows that interventions aimed at improving outcomes and addressing the impact of disadvantage on life chances are most effective in the earliest years of life (indeed, the aforementioned Institute of Education study argued quite clearly that “policy targeted at poverty alleviation should be directed at these very early years”).²

This highlights the importance of using metrics which adequately reflect the experience of persistent poverty in the early years when measuring progress against whatever target is set (we note, for example, that this problem is less of an issue if persistent poverty is measured on a household basis, as it would be possible for a child to be born into a household which was already in persistent poverty). We therefore urge Government to give due consideration to such data issues, as they will be crucial from the perspective of delivering effective interventions.

Second, we note that Government’s stated aim is to develop a new set of child poverty measures, which raises a question about how useful the new persistent poverty target will be in the long-term. Furthermore, there are concerns over whether we are currently on course to meet the targets set in the Child Poverty Act 2010 – the Social Mobility and Child Poverty Commission’s inaugural “*State of the Nation*” report stated last year that the Government was not on track to meet its statutory goals and that the relative poverty target could be missed by as much as two million,³ although we recognise that at this stage failure to meet the targets is not inevitable. The Child Poverty Unit has made clear that, at present, the development and achievement of the persistent child poverty target represents a highly significant legal obligation on the Government that it intends to meet in full, and we welcome this commitment.

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
E-mail address for acknowledgement: john.davies@4children.org.uk	

² Andy Dickerson and Gurleen Popli (2012) [Persistent poverty and children’s cognitive development: Evidence from the UK Millennium Cohort Study – CLS Cohort Studies, Working Paper 2012/2](#), p. 20

³ Social Mobility and Child Poverty Commission (2013) [State of the Nation 2013: Social Mobility and Child Poverty in Great Britain](#), p. 4

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

<input checked="" type="checkbox"/> Yes	<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 use real discussion with affected parties and experts as well as the expertise of civil service learning to make well informed decisions
- departments should explain what responses they have received and how these have been used in formulating policy
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

If you have any comments on how DfE consultations are conducted, please contact Aileen Shaw, DfE Consultation Coordinator, tel: 0370 000 2288 / email: aileen.shaw@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed responses should be sent to the address shown below by 14 August 2014

Send by post to: Persistent Child Poverty Target Consultation, Child Poverty Unit, Sanctuary Buildings, 20 Great Smith Street, London, SW1P 3BT.

Send by e-mail to:

PersistentChildPovertyTarget.CONSULTATION@childpovertyunit.gsi.gov.uk.