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Douglas Hamilton
Chair of the Poverty and Inequality Commission

By email to:
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Dear Douglas

I am writing to thank you for the Commission's advice on addressing poverty during the school holidays last year. I apologise that it has taken longer than you may have expected to fully respond. It is clear that the Commission gave a great deal of thought to the report and sought to ensure it was informed by the views of stakeholders and people living in poverty.

As you know we are already making progress to address many of your recommendations through work ongoing across government and that this work is part of our wider actions to tackle child poverty as set out in Every Child Every Chance. I provided some detail when I attended your meeting on 13th December and below is further information within your three main recommendations.

Financial support

The main recommendation in this area was that the Scottish Government should introduce an additional cash benefit during school holiday periods in recognition of the additional costs that families face, with a further recommendation about advice services.

Additional Cash Benefit

A considerable amount of work is already underway to develop an income supplement for families on low incomes, as set out in Every Child Every Chance. Our main focus is on this as it addresses our fundamental position that we want people to have sufficient income to support their families and, as far as possible, for families to have stable incomes to help with household planning; this will be all year round support.

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We are carrying out options appraisals just now and I will report to Parliament in June on our progress. I am determined that we get this right to ensure it actively helps lift children and families from poverty in the most effective way possible meeting the principles set out in Every Child, Every Chance.

Introducing a cash benefit for eligible families in the school holidays would not be a quick or simple process, would require both consultation and legislation and could potentially delay our progress on delivering the income supplement. Therefore, this will remain my priority at this time.

Having said this, I am aware that some local authorities wish to explore what forms of school holiday support might be possible and they have the flexibility and ability to explore what is best for their local communities. In line with the Commission's recommendations, we will continue to support councils in this. Work is already underway using Attainment Challenge funding to trial use of the Young Scot card to access food from local authority sites during weekends and holidays. We are also discussing with partners the feasibility of testing providing cash payments in one or more local authorities in 2019/20 as part of our approach to tackling food insecurity in the school holidays. Learning from these and similar projects will inform future policy development.

In the meantime, the Scottish Government continues to directly challenge the causes of poverty by focusing on increasing incomes from employment, reducing household costs and maximising social security income. Our range of activity includes promoting the living wage, funding a range of new employability programmes with a parental focus, and by embedding a rights-based approach in the design and delivery of our new Scottish social security system.

Advice Services

As a specific example of our work to maximise incomes for families on low incomes, we launched the Financial Health Check (FHC) service in November last year, backed by funding of £3.3 million over two years. The FHC offers families access to free personalised advice on money matters including accessing financial support, benefit take-up and reducing household energy costs to address the 'poverty premium' of paying more for essential goods and services. Families can access a FHC at a time and place that best fits their needs. We have already raised awareness of this service through a marketing campaign and at least 15,000 households each year are expected to benefit. This is in addition to £1.46m already provided to Citizen Advice Scotland for welfare mitigation advice.

In addition, we provide funding to One Parent Families Scotland to support the income maximisation priority within the Tackling Child Poverty Delivery Plan and we also fund Child Poverty Action Group to provide a second-tier welfare rights advice provision to other professionals. We will consider further how our wider funding for advice services can contribute to addressing the issues for families relating to school holidays

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Co-ordinated approach to school holiday support

You recommended that the Scottish Government, COSLA and local authorities should work together to take a strategic approach to developing and funding a coordinated package of school holiday support that addresses the full range of pressures faced by families with low incomes. Additional recommendations include use of school buildings, coordination of activity within government and streamlining funding sources.

Coordination of activity across Scottish Government

We are already taking action to work more strategically with partners on tackling poverty, with a significant level of coordination now supporting delivery of our child poverty ambitions as a whole. We have established a Directors Group to steer the Child Poverty Programme across government. It is chaired by the Director General for Education, Communities and Justice, and includes the Directors for Children and Families, Education, Social Justice and Social Policy. Representatives from the Children's Sector Strategic Forum, who have a role in monitoring cross-government development of child poverty-related actions, sit as observers in this group. The group provides a strong strategic focus for a range of issues and I have now asked them to look at school holiday provision across government, in response to the Commission's report.

Coordinated Partnership Approach

We are taking a coordinated approach in the package of support for local partners to produce local child poverty action reports – with COSLA, the Improvement Service, the NHS, Poverty Alliance and the Scottish Poverty and Inequality Research Unit all contributing. Many local partners have a school holiday focus and our support is helping share innovative policy ideas and best practice. National consideration of these issues can help with and build on best practice locally and my officials will be considering how best to make this happen.

Our Programme for Government committed us to working with COSLA, local authorities, the third sector and other stakeholders to build momentum, trial new approaches and develop a clear plan of action for the future to eradicate food insecurity in the school holidays. We are ensuring that work is informed by existing services, building on good practice and encouraging spread of successful models. We are aligning with work on tackling poverty generally and with the development of out of school care policy. We are already facilitating closer working between local authorities and the third sector to harness their individual strengths and encourage better coordination of activity across a range of work. Officials in these policy areas are working together to ensure their actions are coordinated.

We have committed an additional £2 million in our Fair Food Fund in 2019/20 to step up our work to tackle food insecurity among children and have made good progress already in discussions with CoSLA about the best strategic approach, informed by some useful data that they have gathered from local authorities. Crucial to this work is developing a nuanced, cross-cutting approach that brings together the various interests and concerns.

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We are aware that in many local authorities, programmes are in place that support children with activities, lunches and transport and that many of these also offer support for the wider family including providing food to take home, offering welfare advice etc. We recognise that different communities have different requirements and it is right that local authorities have the flexibility to develop local responses.

Streamlining Funding

In relation to more joined up funding for the third sector, we will shortly be launching a new fund to promote a more responsive, community-led, needs-based, place-based approach. One that is flexible and can adapt to existing and emerging community issues, circumstances and priorities in a way that encourages more effective strategic neighbourhood/place-based partnership working in a holistic way.

Access to School buildings and other local authority venues

Scottish Government officials meet with local authority representatives responsible for managing the school estate on a regular basis through its school building programme and on their estate management plans. As a response to the Commission's advice, I will examine this matter in more detail, in collaboration with the Association of Directors of Education in Scotland and the Scottish Heads of Property Services to understand what further opportunities exist to utilise these public facilities to their maximum potential.

In addition, we are providing funding to Children in Scotland for a project specifically to tackle food insecurity in the school holidays and as part of that they are working with Community Planning Partners in a number of areas to form partnerships, utilising existing resources which will include school buildings. The learning from this work will contribute to further policy development around the holidays by allowing us to understand the facilitators and barriers to more coordinated approaches using existing resource.

Holiday and Childcare Provision

The main recommendation here is that building from existing services, holiday club provision, with nutritious and culturally appropriate food as a core element, should be available for all children from low income families, with additional recommendations including those around models of provision, transport and the Care Inspectorate.

Framework for afterschool and holiday childcare

The Programme for Government committed us to developing a strategic framework for after-school and holiday childcare over the course of this Parliament and a dedicated team has been established to drive this work forward. Our developing policy will include consideration of all types of provision for children and families available in local areas during the holiday period and won't exclusively focus on those whose primary function is childcare (ie. registered daycare of children services) recognising the value of wider activities based programmes which may also be providing food.

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Involving stakeholders

The team has brought together a range of key stakeholders into a Working Group to inform the development of the Framework. The team is also engaging widely with parents and children, including those with lived experience of poverty and those with ASN, in order to understand the barriers to accessing holiday childcare including issues such as transportation, as well as listening to children's voices regarding what they would like to see from a holiday service and what the barriers are currently to accessing those. We will publish a consultation in summer 2019 seeking views on the draft framework and the consultation process will further engage parents and children as part of this developing policy. Many of the issues raised by the Commission are likely to be directly addressed in the framework.

Models of Provision

One of the key points that the Group has agreed is that out of school care should be accessible, and meet the needs of children and young people, parents and communities. It is likely therefore that there will be different models of provision to meet the needs of different families. Affordability is a key consideration so that childcare is available for those who cannot currently access it, for example due to cost. The issue of how food can best be integrated into provision will be informed by the Working Group and considered in the context of wider work on food insecurity as referenced above.

The team are also considering how to map existing unregistered holiday provision and gather any evaluations of impact. We know what exists in relation to registered holiday provision but it will take time to understand the extent of unregistered provision and how that is delivering both food and childcare elements for families.

Impacts of wider policy developments

The team is also engaging with other policy areas within Scottish Government as they develop the framework including in relation to learning and attainment, health and wellbeing, child poverty and food insecurity, play, social security, youth strategy, accessibility, employability and economy, knowing the impacts that each of these policy areas has on the availability and accessibility of holiday childcare.

Care Inspectorate registration

In relation to the recommendation that government should work with the Care Inspectorate to clarify issues around whether registration is required for holiday provision, the Care Inspectorate are clear in the legislative definition of daycare of children services. This definition excludes provision that is primarily activity-based, such as sports clubs, and therefore, childcare vouchers cannot be used by parents to help pay for these services. We have become aware of this issue as we carry out engagement with children, parents and service providers as part of our work to develop the new framework for Out of School Care. In partnership with the Care Inspectorate, we will explore this issue as we look to improve the quality and accessibility of holiday provision in Scotland. In the meantime, I understand that clarity would be beneficial for providers of holiday care therefore I will consider how we provide that guidance.

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I hope that the information above reassures you that work is in hand across Scottish Government to address the issues raised in your report, and that the Commission's report has provided us with further actions to take forward.

I would like to thank you and the Commission as a whole for your help in developing this agenda and I look forward to continuing to work with the Commission.



AILEEN CAMPBELL

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