

Racial Equality and the Child Poverty (Scotland) Bill: Evidence Submission from the Coalition for Racial Equality and Rights

The Coalition for Racial Equality and Rights (CRER) is a Scottish strategic anti-racism organisation which works to eliminate racial discrimination and promote racial justice across Scotland.

Our primary concern in relation to the Child Poverty (Scotland) Bill is its implications on racial equality and its potential effect on minority ethnic children and families. As such, we are grateful for the opportunity to submit evidence to the Social Security Committee to provide an overview of some key points for consideration. The bulk of our response will focus on the Bill's Equality Impact Assessment (EqIA).

Racial Equality and Child Poverty

When considering child poverty in Scotland, it is important to note that statistics and studies demonstrate that children in minority ethnic families are more likely to experience child poverty than their white peers. In particular, it is worthwhile to bear in mind that:

- Children from non-white minority ethnic backgrounds are significantly more likely to be living in disadvantaged circumstances than white children, with 36% of non-white minority ethnic children living in a household with an annual income in the lowest quintiles compared to 22% of white children.¹
- 14% of white British individuals lived in the top 15 Scottish Index of Multiple Deprivation (SIMD) areas in 2011, compared to 35% of African/African British, 23% of Caribbean or Black / Caribbean or Black British, and 18% of mixed or multiple ethnicity individuals.²
- The employment rate in Scotland is considerably higher for white ethnic groups (72.0%) than for non-white minority ethnic groups (55.2%) aged 25-49³, despite school leavers from non-white minority ethnic backgrounds having higher levels of attainment than white ethnic groups.⁴
- Clustering in low-paid work is a significant factor in explaining greater in-work poverty among some minority ethnic groups, with non-white minority ethnic individuals with good qualification levels facing greater barriers to finding work which matches their qualifications than their white counterparts.⁵
- Non-white minority ethnic groups have a lower-rate of benefit take-up, whether due to lack of awareness of entitlement, stigma, or other factors.⁶

While the narrow approach to the Bill may not address issues such as employment and benefit take-up, it is crucial context to consider if the commitment to eradicate child poverty is to extend to all groups.

Race Equality Framework for Scotland 2016-2030

During the development of the Scottish Government's Race Equality Framework for Scotland 2016-2030, CRER engaged with many BME communities around issues of poverty, including child and family poverty. These concerns are reflected in a key goal of the Framework, namely: "*Ensure robust policy responses that support race equality in relation to income and poverty.*"

¹ Scottish Government (2013). [Growing Up in Scotland: Birth Cohort 2 – Results from the first year.](#)

² Scottish Government. [Ethnicity and Income and Poverty.](#)

³ Scottish Parliament Information Centre. [SPICe Briefing: Ethnicity and Employment.](#)

⁴ The Scottish Government. [Summary statistics for attainment, leaver destination and healthy living.](#)

⁵ Joseph Rowntree Foundation (2016). [Poverty and Ethnicity: Key messages for Scotland.](#)

⁶ Joseph Rowntree Foundation (2011) [Poverty and ethnicity in Scotland: Review of the literature and datasets.](#)

To meet this goal, the Scottish Government committed to:

- “Ensure that our response and approach to Social Justice considers measures to tackle poverty across all ethnicities...”
- “Work to fill the gaps in current knowledge on how and to what extent minority ethnic people are accessing the benefits they are entitled to...”
- “Implement the powers that are being devolved as a result of the Scotland Bill 2015-16 in a way that makes full use of those powers to tackle poverty across all ethnicities”
- “Make all possible efforts to assess, understand, and, where we can, mitigate the impact of any UK policies outwith our control which have a financial impact on minority ethnic people with low incomes...”

CRER does not believe the Scottish Government has properly fulfilled its obligation to the Framework’s commitments in its consideration of the draft Bill.

Equality Impact Assessment

In light of the commitments given in the Framework, [CRER’s response to the Consultation on a Child Poverty Bill for Scotland](#) stated:

“CRER hopes that a robust and thorough Equality Impact Assessment is published alongside the draft Child Poverty Bill which highlights the different realities, experiences, and challenges faced by equalities groups living in poverty. It is important to recognise that improvements for the majority do not serve as a proxy for improvements for everyone. Specialised and targeted efforts and initiatives will be needed to eradicate child poverty for all groups and will be more effective than adopting a ‘one size fits all’ approach. If policies to eradicate child poverty (and wider poverty) do not reflect the particular barriers faced by minority ethnic individuals, inequality will only perpetuate and grow.”

The EqIA does note key statistics for various protected characteristics, including ethnicity. However, CRER feels the statistics included were insufficient. While a comparison of poverty rates for all people from the white British group (17%), other white ethnic groups (26%), Asian / Asian British groups (30%), and Mixed, Black / Black British, Chinese, and other minority ethnic groups (37%) was provided, we feel this assessment is inadequate and that the manner in which ethnic groups are clustered is not useful and may mask inequalities faced by particular groups.

The EqIA noted specific issues that had been raised in response to the consultation, including linkages to other Scottish Government strategies (including the Race Equality Framework), considering equality aspects and disaggregation in relation to the income-based measures and targets, the need for better statistics so that the most at-risk groups can be identified and support can be tailored appropriately, and representation of those with knowledge of equality issues on advisory groups.

However, these issues are not given thorough consideration in the EqIA. Rather, the EqIA simply states that the evidence collected over the course of the EqIA satisfied the Scottish Government that there was clear support for establishing the Bill.

The EqIA did note that, “...new policies that seek to reduce child poverty and meet the new targets will need to ensure that equality considerations are at the forefront. Equality Impact Assessment will help with this. It is essential that in meeting these targets, the Scottish Government also closes the poverty gap that exists for gender, race, and disability.” Despite this acknowledgement, CRER is hesitant to accept that the EqIA was comprehensive and detailed enough to ensure that the BME poverty gap is closed, given the lack of inclusion of and consideration for issues affecting minority ethnic groups in particular.

While the Scottish Government does state that the Delivery Plan and individual policy actions within it would ensure that everyone was able to benefit from actions put into place, that inequality gaps would narrow as a result, and that the Bill guidance would reflect equality considerations raised, CRER believes that more detail about this is needed on the face of the Bill and in the EqIA, rather than in future guidance and policies. This Bill will set the tone for future work to eradicate child poverty. As such, serious consideration for equality implications should be given as early as possible to ensure that the legislation and associated policies and actions meet the Scottish Government's public sector equality duty to eliminate discrimination and advance equality.

CRER remains concerned that the Bill (and, to a large extent, its EqIA) has adopted a race-blind approach to the issue of child poverty, especially given the fact that minority ethnic families and children are much more likely than their white peers to experience poverty. It is not enough to simply mention the relationship between race and poverty. As the Race Equality Framework promises, robust policy responses that support race equality in relation to income and poverty are needed.

CRER asks the Committee to consider holding a separate evidence session to focus specifically on the EqIA so that these issues and issues pertaining to other equality groups may be discussed in full.

Question One: Whether statutory child poverty targets should be re-introduced for Scotland

CRER agrees that child poverty targets should be re-introduced for Scotland, as we believe this will enhance transparency and accountability.

Question Two: The appropriateness and scope of the four proposed targets

CRER is supportive of the four proposed targets. It will be important to consider equality aspects in relation to the targets to help determine which groups are the most at risk and thus, who needs the most support.

Initiatives and policies to drive improvement and progress towards meeting the targets should focus especially on the most deprived communities to reduce not only poverty, but income and poverty gaps between groups. Viewing the measures and targets through an equalities lens is crucial for this. In this way, using these established measures and targets will also help track increasing or decreasing gaps for equalities groups throughout the years to come. It is important to remember that poverty affects different equalities groups in different ways; the measures and targets should take this into account.

As such, it is also essential that equalities considerations be taken into account when evaluating progress towards these targets and that relevant data is disaggregated. For example, if the target of fewer than 5% of children being in absolute poverty is achieved, but a disproportionate percentage of those children still in absolute poverty are from a minority ethnic group, CRER would not consider that the target has been fully met. The targets should seek to change the situation for all children living in poverty, not just the majority population.

Question Four: The proposed arrangement for reporting progress towards meeting the targets and how best to hold the Scottish Government to account

CRER stresses that robust, detailed, specific EqIAs must be published alongside progress reports and delivery plans to ensure that all equalities issues have been considered in progress towards meeting the targets.

Question Five: The responsibility placed on local councils and health boards to make local progress reports

CRER believes that local councils and health boards should also produce local delivery plans with specific targets, aims, and actions detailed. It is imperative that local councils representing areas with a significant minority ethnic population – Glasgow City Council, Edinburgh City Council, Dundee City Council, Aberdeen City Council – consider racial equality implications in the development of their local plans and publication of local progress reports.

We support the view of the Equality and Human Rights Commission (EHRC) that, “Any guidance issued and any monitoring required of local partners needs to stress the equality aspects of the policy and the need for inclusive data to be sought to demonstrate that the policy is having its intended effect of benefiting all children living in poverty, not just those living in the most deprived areas.”⁷

Question Six: The existing Child Poverty Measurement Framework and its 37 indicators

CRER believes that the measurement framework, as it stands does not properly explain or detail the situation for minority ethnic children living in poverty.

Often the experiences of minority ethnic children living in poverty differ from that of the white ethnic majority. For example, while minority ethnic groups are twice as likely to be in poverty as the white Scottish/British group, minority ethnic children perform well in school. Indeed, all non-white minority ethnic groups have higher levels of positive post-school destinations than white young people. Even those minority ethnic groups which face the highest levels of poverty have high attainment. This is important to note as poor attainment is not necessarily an indicator of poverty for non-white minority ethnic children and, therefore, initiatives to raise attainment will likely not benefit these groups. Additionally, while 62.1% of the poorest children feel accepted by their pupils, this does not account for racism which may hinder feelings of acceptance for minority ethnic pupils outwith the influence of poverty.

It is also known that many minority ethnic families living with income deprivation do not live in a SIMD deprived area, meaning that indicators based on SIMD may fail to benefit a significant proportion of those who live in poverty outside these areas.

Significant variations exist across these 37 indicators in relation to education, health, employment rate, apprenticeships, housing, etc.⁸ As such, the measurement framework addresses aspects, indicators, and experiences of poverty for those from a white majority ethnic group, but at times neglects those of individuals from a minority ethnic group.

If we use this measurement framework to frame the situation and evaluate success in eradicating child poverty, minority ethnic children and their families are likely to be left behind or have their experiences and realities overlooked.

All measurement frameworks and indicators should be disaggregated for equalities groups as efforts to change the situation for one group may not necessarily address disadvantage for all groups. Different approaches, initiatives, and tactics will be needed to address poverty for all children; disaggregation of data and measurements is key for this.

Question Seven: The establishment of a national poverty and inequality commission and its status and powers in relation to the Bill

CRER would be supportive of the establishment of a national poverty and inequality commission. We stress that the commission should endeavour to include racial equality experts with knowledge of poverty issues. This would bring a racial equality focus to the work of the group and ensure that recommendations benefit all those facing poverty, not only those from majority ethnic groups.

⁷ Scottish Government. [Child Poverty \(Scotland\) Bill: Equality Impact Assessment](#)

⁸ CRER would be happy to provide the Committee with additional examples of these variances.

Conclusion

CRER asks the Committee to keep these issues in mind during its inquiry into the Child Poverty (Scotland) Bill, as we believe an equalities approach will be needed to fully address the issue. Racial equality must be given appropriate consideration.

For further information on this issue, please contact:

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