1. The NASUWT welcomes the opportunity to comment on HM Government’s consultation on its draft Child Poverty Strategy 2014-17.

2. The NASUWT is the largest teachers’ union in the UK.

3. The NASUWT’s response considers important contextual issues that should guide the development of national child poverty policy and gives the Union’s views on the key proposals set out in the draft strategy.

GENERAL COMMENTS

4. The NASUWT is clear that one of the most profound and damaging consequences of child poverty is the impact that it has on pupils’ educational attainment, their wider wellbeing and their future life chances.

5. The establishment of a purposeful and coherent cross-Government approach to tackling child poverty and social exclusion must therefore be regarded as a fundamental duty of central Government.

6. NASUWT members, through their work as teachers and school leaders, remain acutely aware of the negative impact of poverty on the lives of pupils, their families and the communities in which they live. This experience has informed the development of the Union’s understanding of
the key features of effective policy strategies to tackle poverty and improve children and young people’s life chances. These include:

- the establishment of an effective statutory and regulatory framework for policy development and implementation;
- sustained investment in anti-poverty programmes;
- co-ordinated cross-Government policy on poverty; and
- the promotion and implementation of effective local approaches to tackling poverty and addressing its impacts.

7. For these reasons the NASUWT welcomed the establishment of a legislative framework through the Child Poverty Act 2010, which set four legally binding income-based targets to be met by 2020. These targets are focused on:

- the proportion of children experiencing relative low income;
- measures of combined low income and material deprivation; and
- measures of absolute low income and experience of long-term poverty.

8. The NASUWT has also remained clear that the development of an income targets and legislative approach must also be complemented by action to ensure that the education system and other child-focused public services are resourced fully to enable them to make an effective contribution to tackling the impacts of material deprivation on children and young people.

9. It is for this reason that the NASUWT remains profoundly concerned that the effect of current and proposed Coalition Government policy, both in terms of specific poverty reduction measures and its broader strategy for education and other key public services will impact negatively on co-ordinated, sustained and effective future work to tackle child poverty. As this submission makes clear, the provisions set out in the draft Child Poverty Strategy 2014-17 do not constitute the effective framework of
policy required to address issues related to children and young people’s material deprivation.

10. The Union has identified a range of policy considerations that it considers essential to the development of an effective child poverty strategy. These issues include:

- the role of the education system in work to address the implications of material deprivation on children and young people’s future life chances and their wider wellbeing;
- the contribution made by wider services for children and young people in tackling the impacts of poverty;
- the importance of policies designed to raise the incomes of financially constrained households;
- the implications of cost-of-living pressures on children and young people in or at risk of poverty; and
- the equality dimensions of child poverty policy.

11. These considerations inform the analysis of the draft Child Poverty Strategy 2014-17 set out in this submission.

SPECIFIC COMMENTS

The role of the education system in addressing the effects of child poverty

12. The NASUWT is clear that the provision of high-quality, meaningful, relevant and engaging learning experiences for children and young people has a critical role to play in addressing the impact of poverty on their educational progress and achievement.
13. It is important at the outset to recognise the progress made by the education system in this country in this respect. While the NASUWT remains clear that continued action is required to sustain and further enhance the ability of the education system to contribute to work to address the consequences of poverty, the achievements of the education system in this country in addressing the education-related impacts of poverty were confirmed in a recent wide-ranging, international comparative study of the effectiveness of education systems in industrialised countries and territories.¹

14. However, it is evident that key elements of the Coalition Government’s policy agenda are placing the ability of the education system to address the implications of poverty at significant risk. Specifically, aspects of policy associated with school funding, the freedoms and flexibilities granted to schools as well as systemic, structural and workforce-related elements of the Coalition Government’s policy programme give rise to legitimate concern. These issues are addressed below.

**School funding**

15. The Union must restate its profound concerns about the implications of the Coalition Government’s policy on the ability of schools to continue to support the educational achievement of children and young people in poverty. The real terms cuts in the school budget of 0.6% per year set out in the 2010 Comprehensive Spending Review (CSR), combined with reductions in the ‘non-schools’ budget of 12% by the end of 2014, continue to have a serious impact on the ability of the schools to support pupils from disadvantaged and socially excluded backgrounds and thereby to promote their progress and attainment as learners.

16. The claim by the Coalition Government that the Pupil Premium is an effective means of supporting children and young people in poverty does
not withstand serious scrutiny at the present time. Rather than representing additional investment in provision for the most vulnerable pupils, the Pupil Premium has merely involved redistribution between schools of a declining overall schools budget, the result of which will be that 87% of secondary pupils and 60% of primary pupils will attend schools set to experience real terms cuts in spending between 2010/11 and 2014/15.

17. The net effect of this feature of the approach to school funding adopted by the Coalition Government will be that over 85% of pupils in schools serving the most deprived areas will see no significant increase in their budget as a result of the introduction of the Pupil Premium. Many children and young people in poverty remain enrolled in schools that face severe resource constraints. In addition, the failure of the Coalition Government to establish effective arrangements to monitor the use to which the Pupil Premium is put by schools has called into serious question its ability to address the needs of children and young people in poverty.

18. It is therefore essential that the Coalition Government recognises that the ability of schools to resource provision focused on addressing the implications of child poverty has become more constrained. Notwithstanding wider considerations about future public spending priorities, it is critical that effective steps are taken to ensure that public money allocated to supporting the needs of materially deprived children and young people is allocated through mechanisms that can appropriately ensure that it is used to the best possible effect.

19. The Department for Education (DfE) will be aware that the NASUWT has continued to raise its concerns about the current approach to funding through the School and Academy Funding Group and through other relevant forums. The Union would welcome the opportunity to continue to

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engage with the DfE to explore ways in which current approaches to funding might be revised to ensure that they make a more effective contribution to supporting the work of schools in tackling the consequences of child poverty.

**Charging policies in schools**

20. Following the Education Act 2011, the NASUWT has continued to express serious concerns about the extension of the statutory definition of ‘optional extras’ by which schools are granted freedoms and flexibilities to levy charges for certain elements of provision deemed outside pupils core curricular entitlement. These concerns are compounded by curriculum, qualifications and accountability reform, particularly that related to the introduction of the English Baccalaureate, that has expanded the range of learning-related activities that school are able to exclude from their core curricular offer and, thereby, permitted to levy charges to parents/carers.

21. The impact of these changes was illustrated in *The Cost of Education*, research undertaken by the NASUWT on schools’ charging policies and the costs these practices impose on parents and carers.³

22. This research has confirmed, for example, that over a fifth of parents responding to the survey reported that they were required to pay for field trips that are compulsory elements of examination courses, such as A-level geography and biology. The vast majority (84%) of respondents also reported that they were required to pay for other education visits such as trips to museums, theatres or nature reserves. Almost half of parents paid more than £50 per year to ensure that each of their children could participate in educational visits required by the curriculum.

23. More broadly, the flexibilities made available to schools to charge for goods and services have continued to impact negatively on pupils’ access

to the curriculum and on the rising cost of living experienced by households with children. The NASUWT research found that well over a quarter of parents were required to purchase textbook and reference books for their children that might reasonably be expected to be made available to pupils without charge. Four out of five parents were required to provide writing instruments for their children while over three quarters of children had basic stationary, such as erasers, compasses and protractors, bought for them by their parents rather than by their schools. Over half of parents surveyed in the research were required to spend in excess of £25 per year per child on equipment and materials of this nature.4

24. With specific regard to physical education, over one-sixth of parents report being required to provide essential equipment for their children, such as armbands, bats and balls, with more than four-fifths of respondents obliged to clothing and footwear for physical education lessons, costing more than three in ten parents in excess of £50 per year per child.

25. School uniform costs were identified as significant by respondents in the research. Of parents required to purchase a uniform, over half spent over £100 on their eldest child alone. In light of the removal by the Coalition Government of advice to schools on the supply of school uniforms, it is particularly noteworthy that well over half (57%) of respondents surveyed in the research were required to purchase uniform exclusively from particular named suppliers. This anti-competitive measure has served to drive up the costs of school uniform, a point which has recently been highlighted with concern by the Office of Fair Trading which found that three-quarters of schools placed restrictions on where school uniform could be bought.5

4 ibid.
5 Office of Fair Trading (2012) Supply of school uniforms, OFT1436 Crown Copyright
26. The research for the NASUWT also considered the growing use of Electronic Cashless Payment Systems (ECPMs). While these systems were introduced initially to resolve issues related to the carrying of cash by pupils, *The Cost of Education* research confirms that they are increasingly being used to put pressure on parents to contribute to ostensibly voluntary school funds and to force substantial pre-payments for school meals and other essential items. Parents surveyed in the research also reported that in some schools, unspent balances in ECPM systems were not refunded and that additional transaction fees were levied by schools and the private sector providers of ECPM services.

27. *The Cost of Education* research highlighted the deteriorating situation across the education system in relation to charging, with increases between 2012 and 2013 in the scale and scope of schools’ charging activities in areas including uniform, educational equipment, educational visits and after-school activities, indicating a greater willingness on the part of many schools to impose costs on parents for core areas of school activity. These trends are corroborated by recent school balances data issued by the DfE that confirms that ‘earned income’ has come to represent an increasingly significant revenue stream for state funded schools.

28. HM Government should therefore be concerned by a growing culture of charging in state funded schools, given the disproportionate impact such practices have on the ability of materially deprived children and young people to access their core educational entitlement. It is essential that action is taken by the DfE to address unacceptable charging policies. This should include consideration of the imposition of a cap on the overall level of charges schools are permitted to apply and unambiguous requirements on schools to ensure that charges are not levied for educational provision nor for goods and services necessary to support pupils’ participation in learning and to facilitate their inclusion in the wider life of their school communities.
School systems, structures and workforce-related policy

29. On admissions policy, the removal of powers previously available to the Office of the Schools Adjudicator to monitor the cumulative impact on socioeconomic equality of schools’ admissions policies, and to take forward remedial action where necessary, are likely to discriminate against vulnerable and socially excluded children. The Coalition Government will note that concerns about this and other similar issues related to implications of the revised School Admissions Code introduced by the Coalition Government have been highlighted in research published recently by the Office of the Children’s Commissioner.6

30. The cumulative effect of these legislative changes has been to risk increasing the extent of segregation of pupils between settings on the basis of their socioeconomic status, the negative effects of which on the progress and achievement of children from disadvantaged backgrounds are confirmed by a considerable body of independent research.7

31. The sub-national effects of structural changes, including the introduction of free schools, the rapid expansion in the proportion of state-funded schools with academy status and, more generally, a diminution in democratic, local oversight of spending decisions, has increased the likelihood of the misallocation of money distributed to schools to address poverty.8 In this regard, the Coalition Government’s reforms to school structures and the nature of the relationship between schools and local authorities have placed at risk the ability of the education system to make the most

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effective contribution possible to tackling the learning-related implications of child poverty.

32. In addition, policies related to the school workforce must be acknowledged as critical to ensuring that the education system is well-placed to address the impact of material deprivation on children and young people as learners.

33. In particular, access to qualified and experienced teachers has a major impact on children’s educational outcomes. Governments with a genuine commitment to tackling the impact of poverty on learning and securing excellence for all children must ensure that every pupil is taught by a qualified teacher. Achievement of this objective requires appropriate levers to be in place to recruit and retain qualified teachers and to ensure the continuous development of teacher quality.\(^9\)

34. It is clear that the Coalition Government's policies in relation to the workforce are entirely inconsistent with these principles. The ending of the entitlement of all children to be taught by a qualified teacher, the dismantling of key elements of the national pay and conditions framework for teachers and the undermining of contractual provisions designed to allow teachers and school leaders to concentrate on their core responsibilities for teaching and leading teaching and learning, have all served to impede the ability of the education system to address the implications of child poverty effectively.

35. The curricular and qualifications frameworks within which teachers undertake their professional roles and responsibilities are also central to the ability of the education system to support work to tackle the learning impacts of child poverty. An effective curriculum and qualifications entitlement, supported by an appropriate system of school accountability,

is critical to ensuring that the education system can enhance the future life chances of children and young people.\textsuperscript{10}

36. In its submissions to DfE consultation exercises on school accountability, curriculum and qualifications reform, the NASUWT has made clear consistently its concern that the Coalition Government’s policy agenda in these areas will work to undermine rather than support opportunities for all children and young people to develop the skills and knowledge required to make the most of their potential in a rapidly changing economic and cultural context. The marginalisation of subjects such as art, music, design and technology, all critical to the UK’s comparative economic advantage in creative and cultural industries, the downplaying of skills development in the revised National Curriculum and the constraints generated by reformed qualifications on the scope available to teachers to make effective use of their professional skills and expertise inhibit the effectiveness of the education system in this respect.

37. The considerations set out above therefore serve to emphasise the urgent need for the Coalition Government to reappraise significant elements of its policy approach if teachers and school leaders are to be given the support they require to help secure the best possible learning outcomes for materially deprived and vulnerable children and young people.

**The role of wider services for children in work to tackle child poverty**

38. While the importance of the distinctive role played by the education system in work to tackle the implications of child poverty is clear, as noted above, it is equally well-established that effective strategies to address the implications of material deprivation on the life chances of children and young people require the development of effective multi-agency and multi-disciplinary policy approaches.

\textsuperscript{10} ibid.
39. However, the direction of policy established by the Coalition Government in relation to collaboration between services for children and young people is placing their ability to contribute effectively to addressing the impact of child poverty at serious risk.

40. In particular, the abolition of the requirement on key services for children, including schools, to collaborate with local authority-led Children’s Trusts has served to fragment and undermine the ability of these services to ensure that their activities maintain an effective focus on the needs of disadvantaged children, young people and their families. The lack of local service co-ordination that the disestablishment of Children's Trusts has generated will serve to undermine the demonstrable progress they secured previously in meeting the needs of children and young people in poverty.\textsuperscript{11}

41. The ongoing and significant reductions in funding for children’s services also placed this work in jeopardy. As a result of the pressures on under-resourced children’s services to narrow the scope of their activities to address budget constraints, the integrated working central to tackling child poverty has been impaired significantly.\textsuperscript{12}

42. In relation to the undermining of work to tackle child poverty related to the deterioration of multi-agency frameworks since 2010, the NASUWT notes the findings of the Independent Review of Early Intervention commissioned by Ministers on the contribution that effective early intervention strategies can make to work to address the impact of poverty on the life chances of children and young people.\textsuperscript{13}


43. It is particularly important to note that the Review placed great stress on the importance of multi-agency working in effective approaches to early intervention.\textsuperscript{14} It is clear that many of the examples of effective multi-agency working identified by the Review involved local agencies and practitioners operating within the context of the collaborative frameworks established prior to the Coalition Government taking office.

44. In taking forward effective policy with regard to tackling poverty through early intervention programmes, the Review’s findings highlight the extent to which the steps proposed and those already taken by the Coalition Government will undermine rather than support effective action to address the consequences of material deprivation during childhood. In this respect, the Review complements the position established in this submission that the dismantling of collaborative interagency frameworks will hinder local-level work to enhance the life chances of children and young people. A more effective, multi-agency approach to tackling the implications of child poverty must therefore be central to the recasting of national strategies advocated in this response.

**Work and household income**

45. While it is essential that effective policy approaches are adopted at national and local level to support the ability of schools and wider services for children to tackle the implications of poverty for the life chances and wellbeing of children and young people, the NASUWT remains clear that HM Government must continue to ensure that progress towards the targets for poverty reduction set out in the Child Poverty Act is sustained. This must include prioritising policies that will improve the income levels of households in or at risk of poverty.

46. However, projections for levels of child poverty for the rest of this decade are profoundly disappointing. Research undertaken by the independent

\textsuperscript{14} ibid.
Institute for Fiscal Studies (IFS) confirms that as result of the Coalition Government’s economic and social policy agenda, the number of children in the UK experiencing absolute poverty is set to increase by 1.4 million between 2010 and 2020. As a result, over 27.2% of children will be living in absolute poverty by 2020, significantly beyond the 5% target mandated currently by the Child Poverty Act.

47. The impact of growing levels of poverty on school age children and young people were identified in research undertaken by the NASUWT. This research, *The Impact of Financial Pressures on Children and Young People*, found that almost three-quarters of teachers had encountered children coming to school hungry, while four fifths of respondents surveyed in the research reported that they were aware of pupils who were lacking in energy or concentration due to eating poorly. A similar proportion of respondents reported that they had seen pupils wearing clothes inappropriate for the weather conditions of the day, had clothes that were unwashed or who did not have appropriate footwear.

48. Housing was emphasised as a particular area of concern in the research. Almost a third of teachers reported that they had encountered pupils who had left or arrived mid-term because they were forced to leave their homes or who had been living in temporary accommodation such as hostels or bed and breakfast establishments.

49. The research identified that as a result of these pressures, over one-fifth of respondents had lent or given money to pupils themselves, with a further two-fifths reporting that their school or college had lent or given money to pupils directly. Respondents also reported incidents of food, equipment and clothing given or lent to pupils.

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17 *ibid.*
50. The survey confirmed that respondents to the survey were clear that poverty had a profound effect on the pupils they taught in terms of their progress as learners as well as on their socialisation, their emotional welfare and their physical wellbeing.  

51. In terms of effective policy responses to these implications of poverty, teachers not only identified issues related to the availability of resources, but also stressed the contribution that wider services for children are able to make to addressing the impacts of material deprivation, reflecting concerns expressed elsewhere in this submission in relation to the approach to these services adopted by the Coalition Government.

52. A copy of *The Impact of Financial Pressures on Children and Young People* is appended to this submission.

53. The research also stressed the impact of unemployment on the poverty experienced by children and young people. The NASUWT therefore notes the emphasis in the draft Child Poverty Strategy 2014-17 on increasing levels of employment as a key means of raising children and young people in materially deprived households out of poverty. The Union recognises that the relationship between prolonged unemployment and poverty is well established and therefore supports action to increase high-quality employment opportunities a key element of any effective strategy to tackle unemployment and reduce the levels of poverty experienced by children and young people.  

54. The NASUWT further notes the reference in the draft Strategy to the fact that, since 2010, the number of adults in work has increased by 1.3 million. While any growth in employment is welcome, it should be recognised that

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18 *ibid.*

figures published by the Office for National Statistics (ONS) highlight important changes in the UK labour market that cast doubt on the extent to which this growth in employment is likely to have a positive impact on raising household incomes and thereby addressing levels of child poverty.

55. In particular, the most recent ONS data indicates significant increases in levels of self-employment. Between January 2008 and January 2014, the ONS reports that the number of workers in some form of self-employment increased by over 485,000.\textsuperscript{20} Research confirms that for a substantial proportion of these workers, entry into self-employment has been driven by limited availability of other forms of work and has often been associated with significant reductions in their levels of disposable income.\textsuperscript{21} Over the same period, the number of people working on a part-time basis has increased by 588,000, compared with an increase in the numbers of full-time workers of less than 64,000.\textsuperscript{22} Many workers in these circumstances have also experienced declines in income and have only taken on part-time work as a result of an absence of better-paid, full-time employment opportunities.\textsuperscript{23} Growth in employment has also been centred in occupational sectors with relatively low pay, with almost 80% of job creation since June 2010 centred in industries in which the average wage is below £7.95 an hour.\textsuperscript{24}

56. Despite claims by the Coalition Government that disposable income has increased for the majority of workers, ONS analysis confirms that incomes

\textsuperscript{22} ONS (2014). \textit{op.cit.}
outside of the upper deciles of the income distribution dataset have, in fact, stagnated or declined in recent years.\textsuperscript{25}

57. It is therefore difficult for the Coalition Government to sustain on any factual basis its assertion that changes in the wider labour market will make an effective contribution to tackling levels of child poverty.

58. Research published by the Child Poverty Action Group also confirms that it is also not the case, as the draft Strategy insists, that the reforms to the tax credit and benefits system being taken forward by the DWP and HM Treasury will support efforts to move children and young people out of poverty.

59. It is therefore evident that these policies must be reversed if adults are to be provided with the support they require to secure well-paid, secure jobs and ensure that their dependent children are not subjected to unemployment-related poverty and deprivation.

60. The NASUWT is also clear that given the over-representation of households led by adults with protected characteristics under the framework of the 2010 Equality Act among those that are subject to poverty and material deprivation, it is essential that equality dimensions of policy are embedded from the outset in national child poverty strategies.\textsuperscript{26}

61. The Union is therefore concerned that the draft Child Poverty Strategy 2014-17 fails to reflect adequately the extent to which the incidence and impacts of material deprivation impact disproportionally on children, young people and families with protected characteristics. HM Government must therefore undertake a meaningful review of the equality impact of its child


poverty measures to date if policy development is to be taken forward effectively and equitably.

Living standards

62. The NASUWT recognises that as well as enhancing levels of household income, action to address child poverty must also take effective account of the living costs faced by families in materially deprived circumstances.

63. Research confirms that the cost of bringing up children in households near or below absolute and relative poverty thresholds has increased significantly since the Coalition Government took office.

64. The minimum necessary cost for raising a child rose by 4% in 2013.\(^{27}\) These costs included significant increases in childcare costs, which increased at 5.9% from 2012 to 2013, as well as other outgoings associated with council tax charges and increasing rents for social housing.\(^{28}\)

65. It is therefore a matter of profound regret that while the draft Strategy apparently recognises the importance of rising living costs on levels of child poverty, it does not set out a coherent approach to tackling the cost pressures faced currently by low-income households.

66. The NASUWT further notes the Coalition Government's assertions that recent reductions in the headline rate of inflation will alleviate cost pressures on low-income households. However, notwithstanding Ministerial claims to the contrary, independent analysis confirms that price increases in non-discretionary items, including food, utility costs and transport, have continued to exceed overall price measures as indicated by the overall rate of CPI. Given that non-discretionary items constitute a


\(^{28}\) ibid.
greater proportion of the expenditure of low-income households than for households generally, inflation in the price of essential goods and services continues to have a serious and detrimental impact on the material wellbeing of children and young people in poverty.²⁹

67. It is therefore clear that as part of the development of an alternative national anti-child-poverty strategy recommended by the NASUWT, the Coalition Government must give more purposeful consideration to the impact of cost-of-living pressures on children and young people living in low-income households. In particular, it must ensure that its tax and benefit policies are recast to take more effective account of the impact of current cost pressures on the budgets of materially deprived families.

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General Secretary

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