Dear Sir/Madam,

Re: Measuring Child Poverty: A consultation on better measures of child poverty.

The Office of Commissioner for Children and Young People (NICCY) was created in accordance with ‘The Commissioner for Children and Young People (Northern Ireland) Order’ (2003) to safeguard and promote the rights and best interests of children and young people in Northern Ireland.

Under Articles 7(2)(3) of this legislation, I have a mandate to keep under review the adequacy and effectiveness of law, practice and services relating to the rights and best interests of children and young people by relevant authorities. My remit is children and young people from birth up to 18 years, or 21 years of age if the young person is disabled or in the care of Social Services.
In determining how to carry out my functions, my paramount consideration is the rights of the child and I am required to take into account relevant articles of the United Nations Convention on the Rights of the Child (UNCRC).

The four UK Children’s Commissioners have identified child poverty as one of the most pressing child rights issues across our four jurisdictions. Our joint work on the UNCRC mid-term report in November 2010 highlighted our concern about child poverty and the responsibility on UK and devolved governments to support children and families in such a way as to ensure that each child’s right to an adequate standard of living, as outlined in Article 27 of the UNCRC, are realised.

In Northern Ireland, while we have similar levels of relative and absolute child poverty, persistent child poverty is considerably higher than other parts of the UK. Research conducted by Save the Children, the University of Ulster and Queens University Belfast in 2008 found levels of persistent poverty among children in Northern Ireland more than double that in Great Britain (21% compared to 9%).

A subsequent JRF Viewpoint ‘What can we do to tackle child poverty in Northern Ireland?’ (2009) indicated four main reasons for higher persistent poverty in Northern Ireland:

- High levels of worklessness: 31 per cent of the working age population is not in paid work, higher than any GB region and 6 per cent higher than the GB average;
- High rates of disability and limiting long-term illness, especially mental ill-health;
- Low wages: the median wage for men working full time is 85 per cent of that for British men; and
- Poor quality part-time jobs and obstacles to mothers working.
The report also drew attention to the fact that the most disadvantaged children in Northern Ireland live within communities that continue to experience high levels of violence associated with the legacy of the conflict. Moreover, disadvantaged young people are at risk of being attracted to paramilitary activities if their social exclusion is not addressed.

I welcome the concern outlined in the consultation document to understand better the reality of child poverty today. It is vital to understand the roots of child poverty and the interventions that may be successful if it is to be effectively tackled by governments. Moreover, it is vital to take action to alleviate the impact of poverty on children’s lives, on their experiences of education, play and their family life. It is particularly important to tailor interventions to the particular situations in different areas and not assume that a 'one size fits all' approach will work in every case. As the information outlined above shows, there are particular challenges in Northern Ireland that differ from other parts of the UK, requiring a customised, sustained approach.

While it is important to have a range of indicators to assist in understanding the reality of child poverty, I believe that it is essential that the four measures set out in the Child Poverty Act 2010 are maintained. These four measures, relative income, absolute income, mixed measure (low income and material deprivation) and persistent poverty have been developed over many years and through extensive consultation with a wide range of actors. Each measure provides a particular picture of poverty and, as with any statistical measure, each has its own particular limitations. Together, however, they provide a robust measure of child poverty. We will know that child poverty is truly being addressed when levels are falling across each measure.
When the First Minister and deputy First Minister presented their report to the Assembly in May 2012 on the first year of the Child Poverty Strategy, as required by Article 12(7) of the Child Poverty Act 2010, I was concerned to note that only figures for two of the four child poverty measures were included. The report did not report upon levels of persistent child poverty, nor on the mixed measure which includes low income and material deprivation.

Most data on child poverty is collected on a GB-wide basis, and the responsibility for gathering comparable NI data largely falls to the NI Administration. I have indicated to the Office of the First Minister and deputy First Minister that I am concerned that data may not be collected in relation to all four measures included in the Child Poverty Act 2010, particularly given the high levels of persistent poverty in Northern Ireland. In a time of limited resources, while developing further measures for child poverty may be a positive suggestion, it is vital that the focus is on providing robust data for Northern Ireland in relation to the four measures set out in the 2010 Act.

Clearly other data must be collected, such as the information quoted above from the JRF Viewpoint, to assist in understanding the causes of child and family poverty and to support the development of targeted interventions. However, this need not be collected on an annual basis, as the four measures already identified are adequate to ensure effective tracking of the levels of child poverty across the UK.

It is important to recognise that the four current measures reflect a common understanding of child poverty, both in terms of low income and material deprivation. As Professor John Veit-Wilson of Newcastle University has pointed out in his response to this Consultation, ‘Poverty cannot be defined in any way one likes. Its technical definition in research should not stray too far from the everyday meaning of the word.’ Moreover, it is
important that governments measure poverty in a way that allows comparison with other states, as well as over time.

I am convinced that, given the impact of the recession and of the Welfare Reform changes on children across the UK, it is imperative that the focus of UK and devolved governments should be on taking concerted action to tackle child poverty, rather than again reviewing child poverty measurement.

In conclusion, I refer you again to the three recommendations the four UK Children’s Commissioners made in relation to child poverty in our November 2011 Mid Term report:

*The UK Government and devolved administrations should fully implement the Child Poverty Act 2010.*

*Sufficient financial resources should be allocated to tackling child poverty across the UK, funding services targeted at the most disadvantaged, and increasing the household income of poor families.*

*Governments must prioritise services for poor children to address the wide range of inequalities in health and educational outcomes they experience.*

Yours faithfully,

Patricia Lewsley-Mooney
Northern Ireland Commissioner for Children and Young People