

# Statutory Guidance for Local Duties on Child Poverty (Child Poverty Act 2010)

## Consultation Response Form

The closing date for this consultation is: 18 June  
2010

Your comments must reach us by that date.



department for  
**children, schools and families**

**THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online or offline response facility available on the Department for Children, Schools and Families e-consultation website (<http://www.dcsf.gov.uk/consultations>).**

The information you provide in your response will be subject to the Freedom of Information Act 2000 and Environmental Information Regulations, which allow public access to information held by the Department. This does not necessarily mean that your response can be made available to the public as there are exemptions relating to information provided in confidence and information to which the Data Protection Act 1998 applies. You may request confidentiality by ticking the box provided, but you should note that neither this, nor an automatically-generated e-mail confidentiality statement, will necessarily exclude the public right of access.

**Please tick if you want us to keep your response confidential.**

Name Rebecca Handley  
Organisation (if applicable) **pteg** Support Unit  
Address: Wellington House, 40-50 Wellington Street, Leeds LS1 2DE

If your enquiry is related to the policy content of the consultation you can contact Greg Boone on:

Telephone: 0114 259 3898

e-mail: [gregory.boone@childpovertyunit.gsi.gov.uk](mailto:gregory.boone@childpovertyunit.gsi.gov.uk)

If you have a query relating to the consultation process you can contact the Consultation Unit on:

Telephone: 01928 794888

Fax: 01928 794 311

e-mail: [consultation.unit@dcsf.gsi.gov.uk](mailto:consultation.unit@dcsf.gsi.gov.uk)

Please tick the box that best describes you as a respondent.

<input type="checkbox"/> Local Authority	<input type="checkbox"/> Third sector	<input type="checkbox"/> Government Office
<input type="checkbox"/> Police Authority	<input checked="" type="checkbox"/> Transport Authority	<input type="checkbox"/> Health Service
<input type="checkbox"/> Probation & Offending	<input type="checkbox"/> Jobcentre Plus	<input type="checkbox"/> Other

Please Specify: **pteg** represents the six Passenger Transport Executives (PTEs) which between them serve more than eleven million people in Greater Manchester (GMPTE), Merseyside (Merseytravel), South Yorkshire (SYPTTE), Tyne and Wear (Nexus), the West Midlands (Centro) and West Yorkshire (Metro). The PTEs plan, procure, provide and promote public transport in some of Britain's largest city regions, with the aim of providing integrated public transport networks accessible to all.

1 Does the guidance provide a clear explanation (in Section Two) of how child poverty partnership and cooperation arrangements should work, and how these fit with existing partnerships and structures? If not, how else should this be covered?

Yes

No

Not Sure

Comments:

We welcome the multi-agency approach to tackling child poverty. All too often there is disjuncture between the strategies and actions of various agencies which can undermine efforts to tackle poverty and social exclusion. The Social Exclusion Unit report *Making the Connections*, for example, recognised that where services are located and how they are delivered must be given careful consideration. The report found that many new developments such as colleges, hospitals and employment sites are located outside town centres and are in places that are difficult or expensive to reach by public transport. Seven years on from this report, the problem persists. We hope that the cooperation arrangements to deliver local duties on child poverty will help to join up transport, land-use planning and other sectors more effectively to reduce unnecessary transport demands.

2 Does the guidance provide sufficient clarity (in Section Two) on why and how each of the partner authorities named in the Child Poverty Act should be involved in the cooperation arrangements? If not, how else should this be covered?

Yes

No

Not Sure

Comments:

We welcome the inclusion of Transport Authorities as key partner authorities given the vital role transport plays in connecting families to the opportunities that can offer routes out of poverty, including employment, education and training.

The explanation for why transport authorities should be involved in cooperation agreements makes reference to transport infrastructure, and accessibility to local services being particularly important for those living in more remote or rural areas. We would like to add that remote areas frequently include inner-city or city fringe estates where bus operators do not consider it profitable to run services. As a result, many families can find it difficult to reach the best in local services as well as education and job opportunities.

The explanation rightly draws attention to the importance of affordable public

transport in tackling child poverty. In PTE areas, commercial bus fares have soared in real terms to almost double what they were 20 years ago. This means that many families on the lowest incomes find themselves 'priced out' of using public transport and forced to make fewer journeys than they would ideally like to make.

The explanation also highlights the importance of having the confidence to use local transport – this is particularly the case for children for whom public transport is a gateway to independence and positive activities. Getting into the public transport habit at a young age helps to broaden travel horizons, enabling children to branch out from their own neighbourhood to reach the opportunities that lie beyond its boundaries and to raise their aspirations. This is key as in later life, reluctance to travel outside of the familiar local area can limit the learning and work opportunities people are willing to consider.

The missing element from the explanation concerns the impact that transport interventions can have on reducing the health inequalities associated with child poverty. For example:

- Public transport, walking and cycling can help ease congestion, thereby improving air quality and safety in urban areas.
- Promotion of walking and cycling for trips, or portions of trips to increase physical activity.
- Bundling child fares with measures to encourage physical activity – for example, a child travel smartcard doubling as a free swimming pass.

To maintain positive outcomes around physical activity for both children and their parents, we need to recognise the importance of promoting 'smarter' travel choices long-term so that walking, cycling and public transport remain the first choice for families, even when income has improved (and when families tend to think about investing in a car). We welcome the opportunity that the local duties offer to better integrate our work in this area with that of Primary Care Trusts and Strategic Health Authorities as fellow partner authorities.

We would also like to comment on the role of Jobcentre Plus in working with local partners to support parents to access employment, as referred to on page 18 of the document. This would fit well with the policy objectives of PTE led WorkWise schemes that are in operation across several PTE areas in partnership with Jobcentre Plus and other local agencies. The schemes support unemployed people to access work by providing free public transport passes to reach interviews and for the first 3 months of employment. The schemes have been very successful in getting people back to work. In the West Midlands, for example, WorkWise has recently been launched across Dudley MBC following successful schemes in Birmingham, Sandwell, Solihull, Walsall and Wolverhampton. Since the initiative started, more than 7,000 passes have been provided for interviews and more than 6,900 people have been given help with travel costs for their new job. The scheme has won national awards for the role

it has played in getting people back into work. We would welcome recognition of the role of partnership schemes such as WorkWise in tackling child poverty by overcoming parents' transport barriers to unemployment.

3 Does the guidance provide sufficient clarity (in Section Two) on how other relevant partners should be involved? If not, how else should this be covered, and what other partners should be included?

Yes

No

Not Sure

Comments:

4 Does the guidance provide sufficient clarity (in Section Three) on what matters should be covered in a needs assessment? If not, how else should this be covered?

Yes

No

Not Sure

Comments:

We welcome the recommendation that the assessment of drivers of child poverty should include consideration of the role of transport. We would like to see this include the mapping of public transport provision. This is important to ensure, for example, that any employment opportunities identified as part of the needs assessment can physically be reached by those who would benefit from them.

5 Does the guidance provide sufficient clarity (in Section Three) on what contribution to the needs assessment partners can make? If not, how else should this be covered?

Yes

No

Not Sure

Comments:

6 Does the guidance provide sufficient clarity (in Sections Three and Four) on who should be consulted in the production of the needs assessment and the strategy? If not, how else should this be covered?

Yes

No

Not Sure

Comments:

7 Does the guidance provide sufficient clarity (in Section Four) on the relationship between the child poverty strategy and other plans and strategies? If not, how else should this be covered?

Yes

No

Not Sure

Comments:

We would like to see Local Transport Plans included under section 4.7 as documents that local child poverty strategies need to draw and build upon. More broadly, efforts to improve outcomes for children living in poverty will be undermined without greater integration between transport, accessibility and child poverty policies at local (as well as national) level. For example, it is generally accepted at local and national level that work is the key route out of poverty. However, attempts to improve family income in this way will fail if people do not have the transport to access employment opportunities or childcare provision. Clear lines of responsibility should be identified for all stakeholders and thought should be given as to how different funding streams can be aligned to support the delivery of partnership schemes.

8 Does the guidance provide sufficient clarity (in Section Four) on the accountability and performance framework around the new duties on child poverty? If not, how else should this be covered?

Agree

Disagree

Not sure

Comments:

9 Do you agree it would be helpful if the guidance were linked to "good practice" examples hosted on existing websites? What other support could be included in the core-offer?

Agree

Disagree

Not sure

Comments:

We think this would be very helpful and PTEs would be willing to support this work by providing good practice examples focused on addressing child poverty at a local level. Additional support that would be valuable might include resources which help us to develop the monitoring and evaluation tools and systems that will help us show how our activities have made a demonstrable difference in tackling child poverty.

10 Does the proposed timetable (in Section Five) provide enough flexibility for the first child poverty needs assessments and strategies to be produced alongside other activities? If not, why not?

Yes

No

Not Sure

Comments:

11 Do you have any further comments on the guidance?

Comments:

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**

Here at the Department for Children, Schools and Families we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

Yes  No

All DCSF public consultations are required to conform to the following criteria within the Government Code of Practice on Consultation:

Criterion 1: Formal consultation should take place at a stage when there is scope to influence the policy outcome.

Criterion 2: Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.

Criterion 3: Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.

Criterion 4: Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.

Criterion 5: Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.

Criterion 6: Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.

Criterion 7: Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

If you have any comments on how DCSF consultations are conducted, please contact Donna Harrison, DCSF Consultation Co-ordinator, tel: 01928 794304 / email: [donna.harrison@dcsf.gsi.gov.uk](mailto:donna.harrison@dcsf.gsi.gov.uk)

**Thank you for taking time to respond to this consultation.**

Completed questionnaires and other responses should be sent to the address shown below by 18 June 2010

Send by post to: Gabriella Goldkorn, Child Poverty Unit, Ground Floor, Sanctuary Buildings, Great Smith Street, London, SW1P 3BT

Send by e-mail to: [statutoryguidance.consultation@childpovertyunit.gsi.gov.uk](mailto:statutoryguidance.consultation@childpovertyunit.gsi.gov.uk)