
Consultation Response Form

The closing date for this consultation is: 15 February 2013
Your comments must reach us by that date.
Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

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

**Reason for confidentiality:**  

<table>
<thead>
<tr>
<th>Name</th>
<th>Hetan Shah</th>
</tr>
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<tbody>
<tr>
<td>Organisation</td>
<td>Royal Statistical Society</td>
</tr>
<tr>
<td>Address</td>
<td>12 Errol Street</td>
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<td>London</td>
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If your enquiry is related to the policy content of the consultation you can telephone: 0370 000 2288 or e-mail: Measure.CONSULTATION@childpovertyunit.gsi.gov.uk
If you have a query relating to the consultation process you can contact the CYPFD Team by telephone: 0370 000 2288 or via the Department's ‘Contact Us’ page.

Please select the category that best describes you as a respondent.

<table>
<thead>
<tr>
<th>☐ Voluntary and community sector</th>
<th>☐ Local authority</th>
<th>☐ Practitioner working with children/families and children</th>
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<tr>
<td>☐ Central Government</td>
<td>☐ Research body/academic</td>
<td>Public bodies and named partners in the Child Poverty Act</td>
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<tr>
<td>☐ Family/organisation representing families and children</td>
<td>☐ Social enterprise</td>
<td>X Other</td>
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Learned society and professional body for statistics
SECTION TWO: POTENTIAL DIMENSIONS

1 Are there dimensions, other than those proposed in the consultation document, we should consider for inclusion in a multidimensional measure of child poverty?

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<th>Yes</th>
<th>No</th>
<th>Not Sure</th>
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This question presupposes that a move to a multidimensional profile of measures will be made. There is a case to be argued that this is not necessary.

First, it is not a priori obvious that a more elaborate measure formed by condensing a number of indicators of disparate aspects will yield a more valid or reliable measure of poverty than the one based solely on income such as the existing HBAI measure. Income as a proxy for poverty has its weaknesses, but merely developing a more sophisticated definition and/or combining multiple aspects into a single measure does not guarantee a superior measure. Moreover, much of the polling evidence in the consultation document is unreliable (e.g. involving self-selected samples, as in web surveys). At the very least, convincing evidence that a proposed alternative measure will be superior should be adduced before substantial costs are incurred.

Second, of vital importance to the government must be conformity to international norms, so that valid comparisons can be made within the European Union, the OECD and the United Nations. All use a definition of household income relative to the median, and the government should hesitate to make it more difficult for the UK to provide internationally comparable data.

Third, a multidimensional profile of indicators can be useful, not least as a way of identifying aspects of poverty. However, it is almost inevitable that a unidimensional scale will at some point be produced, not least because this is necessary if a final figure (e.g. ‘proportion living in poverty’) is to be reported, which can act as a driver for public policy. To produce such a scale, some sort of aggregation or selection of indicators is necessary. This can be done, but care is needed. In this regard, the consultation document conflates causes, symptoms, things associated with poverty, and things which do not seem to be related to poverty in any major way. It can be legitimate to combine such disparate indicators in a coherent way to yield an overall measure, but great care is needed to see that this is done effectively (see question 27).

DIMENSION 1: INCOME AND MATERIAL DEPRIVATION
2 a) How should we measure income as a dimension in a future multidimensional measure of child poverty?

The current HBAI measurement of low income conforms to internationally agreed definitions, and is thus internationally respected and comparable. It is also important for making comparisons across time as well as across space. This data is seen as invaluable by users, and it is especially crucial to retain time series data if the government wants to track long term trends in poverty (as indicated by the consultation document’s focus on long term poverty).

To maintain that standard, it is crucial to protect the Family Resources Survey, and to ensure that its sample size is not reduced, in order to maximise the linkages that can be made within that dataset. But it also important not to try and overload respondents to this survey by adding in the full range of measures suggested by the consultation.

Finally, the current definition(s) of poverty according to income are the product of valid social science procedure. Any replacement would need to be subject to the same degree of rigour, including a robust process of consultation.

2 b) How important is relative and absolute income?

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<th>Important</th>
<th>Slightly important</th>
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This is an area for political debate, which should not take place solely in the technical arena. Relative and absolute measures are appropriate for answering different questions. Once the question is clear, an effective measurement procedure to answer that question can be developed.

There are differences in views on whether to use relative or absolute measures of poverty. These different views represent political judgements and are not empirical in nature. What is needed is a body of empirical evidence against which alternative political formulations can be debated and assessed.
3 How does the ownership of assets such as a house affect our understanding of poverty?

Stores of wealth upon which people can draw may affect their level of resilience against fluctuations in regular income. The liquidity of any assets held is an important measure of the extent to which such stores can be utilised. Houses are inherently illiquid but may provide opportunities to earn income, for example, by letting out a room.

4 How can an income dimension in a multidimensional measure of child poverty avoid the drawbacks associated with a simple income threshold?

The primary perceived drawbacks of an income measure are (a) that it is seen as tapping into just one aspect of poverty, and (b) the debate about whether a relative or absolute threshold should be adopted. Aspect (a) would doubtless be regarded as important in any multidimensional construct, so it should be included. Aspect (b) may or may not be relevant depending on the statistical procedure used to construct a single poverty measure from the multiple component measures. Note, moreover, that the current income threshold is not ‘simple’, but is equivalised for household size, and that a range of measures are already available within the HBAI ‘family’, such as income relative to an historic median.

DIMENSION 2: WORKLESSNESS

5 How important is worklessness as a dimension in a future multidimensional measure of child poverty?
It is important to note that, if measures of worklessness are to be included in an overall univariate poverty measure, they should be included in a statistically legitimate way: appropriate procedures must be used for causes, effects, correlates, etc.

6 How should worklessness be measured?

See previous answer.

7 Does the length of time for which a household is workless matter for measurement?

[ ] Yes  [ ] No  [ ] Not Sure
DIMENSION 3: UNMANAGEABLE DEBT

8 How important is unmanageable debt as a dimension in a future multidimensional measure of child poverty?

☐ Very important ☐ Important ☐ Slightly important
☐ Not important ☐ Not sure

It is important to note that debt is already captured in the HBAI (through questions in the FRS) and through the Wealth and Assets Survey (the key vehicle). Again, debt is related to poverty – sometimes as a cause, but most likely as an effect – and measuring it separately makes sense, as it allows policymakers to explore the inter-relationships, in a way that they could not if they were combined as part of a composite measure.

Also, what makes debt unmanageable is largely a function of income compared to debt level, and so the ‘unmanageability’ of debt cannot be separated as a concept or measure from low income.
9 What aspects of unmanageable debt should we be most concerned about capturing?

See answer to Question 27.

DIMENSION 4: POOR HOUSING

10 How important is poor housing as a dimension in a future multidimensional measure of child poverty?

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<td>Not important</td>
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Measurement of housing is already recognised as a challenge in poverty measurement, which is a reason behind the existence of both before and after housing costs measures. Discussion of how better to reflect quality of housing in measurements of poverty – and, to take a step back, whether this is an inadequacy of current measurements – could be a fruitful one.
11 What aspect of poor housing should be captured in a measure?

12 How can we consider the impact of where children grow up when measuring child poverty?

See answer to Question 27.

DIMENSION 5: PARENTAL SKILL LEVEL

13 a) How important is parental skill level as a dimension in a future multidimensional measure of child poverty?

[ ] Very important [ ] Important [ ] Slightly important
13 b) What level of skills matter?

Unable to answer this out of context.

14 How can we best capture parental skill level in a new child poverty measure?
DIMENSION 6: ACCESS TO QUALITY EDUCATION

15 What impact does attending a failing school have on a child's experience of poverty?

- Significant impact
- Some impact
- Little impact
- No impact
- Not sure

Measuring the value of public goods is an area worthy of exploration. A measure focused solely on private income could ignore (potentially more efficient) mechanisms for securing adequate incomes, e.g. provision of public goods. (The rise in the threshold of the Minimum Income Standard as public support for childcare has been reduced is, to some extent, an example of how a measure of adequacy of income can take public provision into account.)
16 What impact does attending a failing school have on a child's life chances?

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<tr>
<th>Significant impact</th>
<th>Some impact</th>
<th>Little impact</th>
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<tbody>
<tr>
<td>No impact</td>
<td>Not sure</td>
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The consultation document appears to conflate poverty with life chances (and, implicitly, social mobility). These are very different, if interlinked, concepts, and no single measure can capture both (or all three).

Defining and then constructing a measure of 'life chances' is potentially a very interesting undertaking. This would undoubtedly require gathering and using longitudinal data (see, for example, ‘Understanding Society’) – which is not mentioned in the consultation document – and would be worthy of being opened up to comprehensive debate. (Again, there are wider problems here about process.) But it cannot be conflated with poverty. Not only are poverty and life chances different concepts, which thus cannot be combined in one measure, but to attempt to do so would undermine efforts to analyse the extent of the causal link between the two.

17 How should access to quality education be measured?

See answer to Question 15.

DIMENSION 7: FAMILY STABILITY
18 How important is family stability as a dimension in a future multidimensional measure of child poverty?

[ ] Very important  [ ] Important  [ ] Slightly important
[ ] Not important  [ ] Not sure

This is an example of a measure which is normative and hard to measure, more so in an objective manner. See also answer to Question 27.

19 How important is the long term involvement of both parents to their child's experience of poverty and life chances?

[ ] Very important  [ ] Important  [ ] Slightly important
[ ] Not important  [ ] Not sure

See answer to Question 18.
20 How important is the presence of a father to a child’s experience of poverty and life chances?

- [ ] Very important
- [ ] Important
- [ ] Slightly important
- [ ] Not important
- [ ] Not sure

See answer to Question 18.

21 Which experiences associated with family stability should be captured in a measure?

See answer to Question 18.

DIMENSION 8: PARENTAL HEALTH
22. How should we recognise young carers in a multidimensional measure of child poverty?

See answer to Question 27.

23. How should we recognise parental drug and alcohol dependence and mental health conditions in a multidimensional measure of child poverty?

See answer to Question 27.

24. How can parental disability and general poor parental health be reflected in a multidimensional measure of child poverty?
SECTION 3: CREATING A MULTIDIMENSIONAL MEASURE

25 Are there criteria, other than those listed in Section 3 of the consultation document, that we should evaluate a new measure against?

- [ ] Yes
- [ ] No
- [ ] Not Sure

See answer to Question 27.
26 In creating a new measure should any dimension be a gateway?

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<th>Yes</th>
<th>No</th>
<th>Not Sure</th>
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See answer to Question 27.

27 Should the indicators be weighted and, if so, what factors should influence the choice of weighting?

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<th>Yes</th>
<th>No</th>
<th>Not Sure</th>
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A multidimensional measure of poverty can be used in two ways. The first retains the different dimensions as distinct dimensions, so that the overall profile yields deeper insights into poverty and its structure. The second is to use it as the basis from which to extract a single scalar measure which can be used to drive public policy. This extraction involves combining the separate dimensions, and this can be done in various ways. It is perhaps important to note here that this condensation into a single measure does not presuppose the existence of a single dimension of poverty in the real world. Approaches to measurement which do make such an assumption are often termed ‘psychometric’, and are widely used in psychology. However, it is also possible to combine indicators of different aspects (in this case, of poverty) into a single measure, which can be useful for policy decisions. Such measures are sometimes called ‘clinimetric’ and are widely used in diagnostic medicine.

Regarding the first use, the DCLG measures of neighbourhood deprivation provide an example of a basket of measures which are reported independently,
but can be considered as a whole, in order to give a fuller picture of the thing (deprivation) which is being measured, including in this case a spatial dimension. Offering ways of presenting data in clusters, or linking datasets, could be something useful the Child Poverty Unit could offer.

Regarding the second use, combining different dimensions to yield a single overall measure can be done in various ways. Perhaps the simplest is that implicit in the question, a weighted sum, but this is not the only way (e.g. one can require separate dimensions to exceed individual specified thresholds, or gateways).

For clinimetric measures constructed as weighted sums, there is no absolute external criterion which can guide us to the ‘correct’ set of weights. Rather, this is something which must be settled by discussion and consensus, based on what exactly is trying to be achieved (the precise question to be answered).

28 Which indicators should be weighted more or less?

See answer to Question 27.

29 How could we measure child poverty at the local level?
It is highly desirable that it should be possible to replicate any national measure of child poverty at the local level so that local policy decisions are based on the same criteria as national ones. This depends largely on the availability of data sources which allow the necessary degree of disaggregation, which in practice means either administrative sources (or the Census). One of the difficulties in using income as a proxy for poverty is that it is not possible to produce robust estimates at local level from surveys such as the FRS because sample sizes are insufficient (though some useful modelling work has been carried out in the past to produce synthetic estimates). This has led to production of measures such as the DCLG measures of deprivation (see answer to Question 27).

30 How should we check the robustness and simplicity?

The Royal Statistical Society would be happy to comment on any proposed measure.

31 What would you use a multidimensional measure of child poverty for?
Developing a deeper understanding of poverty – and of what is happening to and inside poorer households – is desirable, and many of the elements proposed to form part of the measure will help to do this (though the extent to which that is true needs to be investigated properly). But that is not the same thing as changing how poverty is actually measured, and careful and sophisticated statistical modelling, as well as detailed consultation bearing in mind the use to which the measure is to be put, would be necessary to achieve this. Moreover, any loss of time series data, which would be a result of abandoning existing measures, would be detrimental to recording progress (or otherwise) on child poverty.

32 Please use this space for any other comments you would like to make.

We have four broad comments:

1. Developing a multidimensional suite of measures would be useful for understanding the structure of child poverty.

2. Condensing these measures down to yield a single scalar numerical summary statistic is possible, but care must be taken in doing this if it is to yield a valid measure.

3. It is not clear that the results of the exercise described in (2.) would yield a measure which is more useful for the intended uses than the existing, relatively simple, proxy measure based on income. This is a matter which would need very careful thought before the expense could be justified.

4. The questions primarily address questions related to obtaining a central estimate of poverty at a point in time. Other important questions need to be addressed, including the statistical validity of the estimators (precision and bias); longitudinal questions (persistence and pathways into and out of poverty); situational factors (e.g. household composition/dynamics, neighbourhood); wider psychological concepts such as inclusion/exclusion; time use/contribution; and worth. To make wise choices between alternative policy options requires a statistical picture to be painted that brings together a variety of evidence at different levels.
Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

It was highly unclear in the consultation document what the government’s objection to the current measure of poverty is. For example, at various points the inadequacy of an income measure is discussed; in others, criticism of a relative income measure of poverty, though without an explicit favouring of an absolute measure (in any case, current measures of child poverty, as defined in the Child Poverty Act 2010, include both relative and absolute measures, as well as a composite measure of low income and material deprivation); and space is given also to debating the political incentives that current measures create (though a political question can and should never be resolved through a technical exercise).

The questions in the consultation format do not provide space for critiquing the rationale behind the proposal for a multidimensional measure. Indeed, taken at face value, the format of the consultation response strongly suggests that a decision has already been taken on introducing a multidimensional measure, which would suggest only a partial consultation is taking place.

There is also a crucial issue regarding trust in official statistics: changing the measure of poverty in a way that could be seen as politically expedient means that any measure that replaces (or even ‘supplements’) the current measure as the prime measure of poverty must both be very clear, and have a transparent and inclusive process around determining it – which should include a full consultation on the limitations of the existing measurement.

It is not clear what is hoped to be achieved by many questions, such as 15 and 16, which invite one to tick a box. Since the respondents are self-selected, the proportions giving each response are meaningless. To report the proportions giving answers to such questions invites ridicule and risks damaging public trust in official statistics.

Finally, it is not clear what implications this consultation on the measurement of child poverty is intended to have on the measurement of poverty within the population as a whole. We would argue that there is nothing intrinsically different in the measure of child poverty from general poverty, and therefore any changes in one should be carried over to the other. Otherwise, there is the risk that children identified as ‘poor’ might appear in households that are not so
identified, and vice versa.
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 Education 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?

X Yes  No

All DfE public consultations are required to meet the Cabinet Office Principles on Consultation

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected
- consultation should be ‘digital by default’, but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, tel: 0370 000 2288 / email: carole.edge@education.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 15 February 2013.

Send by post to: CYPFD Team, Department for Education, Area 1C, Castle View House, East Lane, Runcorn, Cheshire WA7 2GJ or email to: MeasureCONSULTATION@childpovertyunit.gsi.gov.uk