

Report on and response to formal consultation on draft Statutory Guidance for local duties on Child Poverty (Child Poverty Act 2010)

Date of consultation:

March 2010 to June 2010



Draft Statutory Guidance for local duties on Child Poverty (Child Poverty Act 2010)

**Report on and response to formal consultation
held March to June 2010**

Presented to Parliament
by the Secretary of State for Education
by Command of Her Majesty

August 2010

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Introduction

The Child Poverty Act gained Royal Assent on 25th March 2010. Part 2 of the Act is intended to enable all local authorities and their partners to establish cooperation arrangements to address child poverty in their local areas. Specifically, it places new duties on local authorities and their named partners to cooperate to tackle child poverty in their local areas, produce local child poverty needs assessments and develop local child poverty strategies. The duties came into force on 25th May 2010. Part 2 of the Act also gives Government the power to issue statutory guidance on the Part 2 duties, guidance which local authorities and their partners must have regard to in responding to the Part 2 duties.

Through a formal consultation exercise that took place over a twelve week period, ending on 18th June, we have sought views on the value of the draft statutory guidance from a wide range of partners, set out in the breakdown below. The local and general elections took place during the consultation period which meant we were unable to promote the consultation in the run-up to those elections. We had, however, undertaken extensive informal consultation, involving more than 350 participants, prior to launching the formal consultation so we did not think it necessary to extend the formal consultation period. We were also mindful of the fact that the duties came into force on 25th May and were keen therefore to conclude the formal consultation and promptly to issue this report on and response to the formal consultation.

The Child Poverty Unit (CPU) would like to express its sincere thanks to all those who took the time and care to respond to the formal consultation. The CPU will carry out a consolidated redrafting exercise to produce a final product later this summer, taking into consideration the responses to informal and formal consultation and the Coalition Government's interests in decentralisation and the localism agenda.

Throughout the report, percentages are expressed as a measure of the total number of those respondents answering each question.

The organisational breakdown of respondents was as follows:

Local Authority	16
* Other	10
Voluntary & Community/Third Sector	9
Transport Authority	1
Probation & Offending	1
Jobcentre Plus	1

** Those responses that fell into this category included a Local Strategic Partnership, an individual, The Office of the Children's Commissioner, Local Government Association, The Teachers' Union, London Councils, The Consumer Financial Education Body, a Children's Trust, The Equality and Human Rights Commission and The Audit Commission.*

The report begins with an overview followed by an analysis of each question within the consultation.

Annex A provides a statistical analysis of responses by respondent type.

Annex B lists all respondents to the consultation.

Overview

Respondents welcomed the opportunity to comment on the draft guidance.

Many respondents commented on the usefulness of the guidance to help local authorities and their partners understand how best to cooperate to tackle child poverty in their local areas and to fulfil the requirement to produce local needs assessments and develop local child poverty strategies.

Responses show that there is interest in and demand for information, advice and support from central government for local authorities, their named partners and others to enable them effectively to respond to the Part 2 duties. There was widespread support for the publication of guidance of some sort. However, several respondents commented that the guidance could be shortened while remaining a useful tool. The consultation has also identified a strong appetite for practical and expert support from sector-led bodies.

Responses show that local authorities and their partners are particularly interested in support that provides more information around the role, and better targeting, of named and un-named partners and exactly what contribution they can provide. There is demand for clear and fulsome support for compiling needs assessments and signposting to key data sets. There is also demand for further support on how to engage partners and gain senior endorsement of child poverty alongside complementary local and wider strategies.

Given the decentralisation and localism agenda, the Government has decided not to publish formal statutory guidance but instead will provide a short, non-statutory guide, accompanied by signposting to a package of sector-led support that focuses on practical tools and short information guides and good practice examples.

Summary

DUTY TO COOPERATE

'Each responsible local authority must make arrangements to promote co-operation between –

- (a) the authority;*
- (b) each of its partner authorities; and*
- (c) such other persons or bodies as the authority thinks fit.'*

Q 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?

There were 27 responses to this question.

19 (70%) respondents thought that the guidance provided a clear explanation and welcomed the multi-agency approach. Six of these went so far as to say that this section of the guidance was very helpful and clear. Several respondents welcomed the flexibility afforded to governance structures so that local authorities can decide how best to fit child poverty partnerships into existing structures. Others commended this section of the guidance for providing a series of checks and questions without being too prescriptive. They felt that it was for local partners to agree how best to implement the duties.

6 (22%) were not sure. Four of these commented on the role of Children's Trusts. There was concern that too much emphasis was put on the Trusts as a vehicle for implementing the local duties and not enough emphasis put on the wider role of the Local Strategic Partnerships (LSPs). Two respondents deemed Children's Trusts unsuitable for leading work on child poverty because they have little or no expertise in relation to adult skills, local employment markets or community cohesion.

2 (7%) respondents did not think that the guidance provided a clear explanation. It was suggested that it is made clearer that the guidance is for local authorities and named partners. One respondent felt that there was too much emphasis on the Children and Young People's Plan (CYPP) which could lead to a strategy that is contained within the children's services arena, rather than the wider issues of employment and skills, transport and housing.

4 (14.8%) respondents requested further clarity on the types of roles, level and responsibilities and examples of good practice governance structures. One respondent wanted the guidance to emphasise that there is no need to formulate new partnerships, but that existing ones can be used. Two respondents were concerned that the guidance omits reference to the wider workforce, particularly the under-5s sector. One respondent, to the contrary, welcomed the recognition of the role of early years and childcare.

4 (14.8%) respondents wanted more emphasis put on the need for joint working. They commented that the difficulty for local partnerships is how to extend joint working further. They felt that the guidance needed to enforce a principle of joint accountability for outcomes and to further reflect the need for a common vision, clear strategic leadership and commitment to the child poverty agenda.

Q2 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?

There were 29 responses to this question.

13 (45%) respondents thought that the guidance provided sufficient clarity. Two of these felt, however, that there should be some acknowledgment of the positive work that has already been done.

11 (38%) respondents were unsure. A number of these respondents requested further guidance on how to engage the statutory partners, focussing on those partners that are especially difficult to engage ('health' partners were mentioned). Questions were raised over what action could be taken if partners failed to cooperate. It was noted that there is no mention of elected members and that their involvement and endorsement is vital and their role should therefore be specifically addressed. Others commented that the guidance should give greater reference to the value of pooled budgets and shared resources and should highlight the role of commissioning. Two respondents felt that the guidance should go further to reflect the importance of housing and regeneration. Several respondents wanted the guidance to give more weight to the fact that many LSPs involve sub-groups bringing together services.

5 (17%) respondents did not think that the guidance provided sufficient clarity. Three of these thought there should be more information on the role of these partners as employers. Further clarity was requested by one respondent on the impact housing can have on the life chances of children and by another on the impact of transport, in particular in inner-city or city fringe estates where bus operators do not run services.

10 (34.5%) respondents requested more information on the expected role of the partner authorities and the nature of their involvement. They regarded the guidance to be clear on the role of local authorities but felt unsure how the partnership would work and exactly what they would contribute. Several respondents identified the need for good practice examples to illustrate how the cooperation arrangements will help to address child poverty, particularly for areas like transport and the police.

Q3 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?

There were 32 responses to this question.

15 (47%) respondents thought that the guidance provided sufficient clarity. Many of these welcomed the role of the Third Sector as a non-statutory partner. However six respondents commented that the guidance should give more weight to the contribution of the sector. It was also noted that the guidance should be amended to change 'Third Sector' to 'Voluntary and Community Sector (VCS)'. Likewise, five respondents commented that the guidance needs revising in light of the changes to status, purpose and responsibilities of some of the non-statutory partners as a result of the new Government.

13 (41%) respondents were unsure and the majority of these indicated a demand for more information on the specific role of the non-statutory partners. Some of these thought that the guidance could be clearer on how employers, businesses and adult training bodies should be involved in the partnerships. Others wanted more clarity on how parts

of the local authority, other than Children's Services, can contribute. Three respondents commented that the guidance makes no substantive reference to the distinctive aspects of rural poverty and poverty in remote urban areas.

4 (13%) respondents did not think that the guidance provided sufficient clarity. One respondent commented that 'as LAs sees fit' does not provide adequate guidance and three respondents requested further guidance on how to engage other relevant partners. Contrary to this, however, two respondents regarded the list of non-statutory partners to be unnecessary as local authorities are free to make their own arrangements and are already aware of how to organise LSPs and other partnerships.

Six respondents regarded the list of other relevant partners to be incomplete and suggested a range of additional partners: Her Majesty's Revenue and Customs (HMRC), childcare and early years providers, Primary Care providers, Fire and Rescue Authorities, Connexions Services, Registered Social Landlords (RSLs), adult training bodies, Consumer Financial Education Body, Credit Unions, welfare to work providers, black and minority ethnic (BME) and refugee community groups, disability and children's groups and Local Enterprise Partnerships (instead of Regional Development Agencies). One respondent was concerned about the LSP partnership arrangements because they regarded LSPs to be exclusionary to women. The respondent recommended that the guidance specifically addresses the barriers faced by VCS organisations that represent and support women and their children. Another felt that more weight needed to be given to the involvement of schools, given their centrality as an investment in children and their impact in leaving poverty.

DUTY TO PREPARE AND PUBLISH A NEEDS ASSESSMENT

'The arrangements made by a responsible local authority under section 21 must include arrangements to prepare and publish an assessment of the needs of children living in poverty in its area ('a local child poverty needs assessment').'

Q4. 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?

There were 33 responses to this question.

16 (48%) respondents thought that guidance provided sufficient clarity and some commented that it was comprehensive and provided helpful signposting to sources of support for data and analysis. One respondent welcomed the flexibility and the balance between prescription and advice.

14 (42%) were not sure. More than half of these were concerned about the availability of key data and requested reassurances on timely availability of data in usable formats. It was noted that regular and more immediate data release would make needs assessments more meaningful. Several respondents thought that the guidance lacked clarity in terms of evidence about which data are really key and why and others thought the guidance needed greater consistency and clarity in relation to collection and presentation of data. Some of these respondents thought that there needs to be more guidance on the methodologies for profiling child poverty cohorts, for example ethnicity. Others requested more information on the value of qualitative data, for example the lack of emotional stability.

3 (9%) respondents did not think that the guidance provided sufficient clarity. It was noted that this is the area where most partnerships appear to be struggling and that time spent on data issues often detract from wider strategy development. One respondent thought that the guidance should focus more on the over-representation of BME children living in poverty, as well as the particular needs of children living in care and unaccompanied asylum-seeking children. Another was concerned that young people aged 16 to 17 who are experiencing hardship will not be picked up by the needs assessment.

12 (36.4%) respondents identified key matters that they regarded to be missing from the guidance, for example couple parent households, housing-related indicators, levels of fuel poverty, leisure and accessibility. It was requested that trend information in relation to local employment and training, health and well-being is also included.

6 (18.2%) respondents thought that a needs assessment template would be beneficial and four respondents would welcome good practice examples of completed needs assessments.

Q5 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?

There were 28 responses to this question.

13 (46%) respondents thought that the guidance provided sufficient clarity. One respondent felt that it did not require any further detail since it is for local partners to agree how best to contribute information. Some, however, thought the guidance could go further in emphasising that it is a joint responsibility. It was suggested by seven respondents that the guidance should state explicitly that there is an expectation to commit resources and share data, information and expertise. They felt this was necessary because of the reticence for data sharing between some agencies. Two respondents signalled that the Department for Work and Pensions (DWP) often refuse to share information vital for their needs assessments.

10 (36%) were not sure and thought that the guidance provided no clear indication of the contribution partners could make with data. They requested further clarity on the contribution that partners can make and a clear identification of what data can and cannot be shared. Some requested, in particular, further clarity about the key drivers of child poverty related to partner authorities, for example housing, transport and preventative health services. It was regarded that this information would enable partners to be more focused locally. They also felt that further clarity on core data sets would be helpful given the potential plethora of data that could be used to inform needs assessments.

5 (18%) respondents did not think that the guidance provided sufficient clarity and were unclear about who is responsible for what. It was requested that the guidance is 'more instructive' about partners' contributions.

Q6 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?

There were 29 responses to this question.

19 (66%) respondents thought that the guidance provided sufficient clarity and welcomed the duty to consult children and parents.

7 (24%) were not sure and thought that this section would benefit from an 'easy to read check list' to ensure wider consultation. One respondent observed that the groups to be consulted differ on the needs assessment and strategy sections of the guidance and found this confusing. Six respondents thought that they would benefit from guidance on how to conduct effective stakeholder consultation, and one respondent wanted guidance on how to avoid stigmatising those in poverty while carrying out consultations. One respondent queried why data on vulnerable and socially excluded groups are included in the needs assessment but there is no duty to consult these groups specifically. Some respondents felt that schools, childcare and early years' providers, women's organisations and the Consumer Financial Education Body should be consulted.

3 (10%) respondents did not think that the guidance provided sufficient clarity. One respondent considered a prescriptive list to be unbeneficial as it needs to fit the individual local area. And another thought that 'as the local authority considers appropriate' is sufficient guidance. There was a degree of confusion from a couple of respondents over who exactly needed to be consulted and they sought further clarity. It was suggested by one respondent that the guidance is strengthened to highlight the importance of effective consultation.

DUTY TO PREPARE A STRATEGY

'The arrangements made by a responsible local authority under section 21 must include arrangements to prepare a joint child poverty strategy in relation to its area and to modify it in accordance with this section.'

Q7 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?

There were 31 responses to this question.

15 (48%) respondents thought that the guidance provided sufficient clarity on the relationship between the child poverty strategy and other plans and strategies. One respondent thought that this particular part of the guidance need only include a list of other needs assessments where links should be made. It was also suggested that the guidance should include learning about what works.

11 (35%) were not sure. A few of these wanted further explanation regarding the interface between local and national strategies. There was an element of confusion in the responses: one respondent claimed that local authorities are waiting for the national strategy to be published before they undertake their local strategy. Others wanted to know if the strategy needs to be a document in its own right. One respondent thought the guidance needed to avoid creating the impression that child poverty strategies are lists of existing activity under economic or child well-being programmes. A couple of respondents wanted the guidance to provide further reference to radical/innovative approaches.

5 (16%) did not think that the guidance provided sufficient clarity and felt that the guidance did not set out clear expectations of actions needed to link the various plans and strategies. There was concern and confusion about significant duplications and interdependencies with other strategies, and it was suggested that since child poverty does not exist in a vacuum, it is therefore better incorporated into a broader poverty strategy for the city as a whole. It was suggested that a timetable outlining the child poverty strategy, Joint Strategic Needs Assessment (JSNA), Local Economic Assessment (LEA) and other local authority assessments would clear up this confusion.

6 (19.4%) respondents thought that other relevant strategies should be referenced, for example employment, overcrowding, financial inclusion, Local Transport Plans, Work and Skills Plan, Education, Employment and Skills Priorities, local parenting strategy, health inequalities, economic development, wider housing strategies and homelessness strategies. It was also suggested that it might be beneficial to illustrate these links in a pictorial representation and to set out how overlaps could be addressed.

PERFORMANCE FRAMEWORK

Q8 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?

There were 29 responses to this question.

9 (31%) respondents thought that the guidance provided sufficient clarity. Some felt that the information is already familiar to councils, whereas others thought that there needed to be a centralised mechanism to measure performance.

16 (55%) were not sure and thirteen of these sought further clarity on the impact of the recent changes made under the new Government on the performance framework. Several respondents also sought further clarity and coherence around the visibility of accountability and performance. They identified a need to ensure performance monitoring arrangements are embedded into current processes to avoid creating a parallel process.

4 (14%) respondents did not regard the guidance to provide sufficient clarity and further information was requested. It was regarded that there needs to be some continuity and comparability between local authorities in respect of child poverty levels and wider social deprivation indicators in order for progress to be monitored across the board. Further information was requested on monitoring and measuring success, with costs involved so that value for money can be assessed.

GOOD PRACTICE EXAMPLES / CORE OFFER OF SUPPORT

Q9 Do you agree it would be helpful if the guidance were linked to 'good practice' examples hosted on the existing websites? What other support could be included in the Core Offer?

There were 28 responses to this question.

25 (89%) respondents agreed that it is helpful to link to 'good practice' examples – some went as far as to say it is essential. Other ideas were also suggested: a bank of information about where local authorities are getting data; update on pilots to see how effective techniques are being piloted; regular updates on Beacon Authorities; information-sharing sessions; and regular updates from central Government on the national agenda. One respondent thought that there may be additional support needs of LSPs which the Core Offer should address.

2 (7%) are not sure and thought that other support to be included in the Core Offer could include resources to help develop monitoring and evaluation tools. One respondent questioned if the support needs of LSPs had been considered in the Core Offer of Support. Another thought the guidance needed to be more explicit about which agencies local authorities and partners can contact for support.

1 (4%) did not agree that it is helpful because examples need to be understood in the context of different authorities and felt that local authorities could arrange their own peer support/exchange mechanisms if they felt it necessary.

TIMETABLE

Q10 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?

There were 23 responses to this question.

8 (35%) respondents agreed that the timetable provided enough flexibility and several of these commented that they had already begun implementing the new duties.

10 (43%) were not sure and there was a degree of confusion about when exactly the needs assessment and strategy need to be developed and/or published. Most of these respondents were concerned about simultaneous and burdensome deadlines, for example LEA, JSNA, and Childcare Sufficiency Audits. Six respondents requested a clearer timetable of the process with dates, ideally in a diagram format.

5 (22%) respondents did not agree that the timetable provided enough flexibility. Most of these thought that the lack of additional funding and tight budgets may affect alignment of priorities and delay or hinder progress. It was noted that two-tier authorities will find timescales especially tight.

COMMENTS

Q11 Do you have any further comments on the guidance?

There were 12 responses to this question.

5 (41.7%) respondents indicated that they found the guidance to be a useful and clear resource. Three respondents praised the guidance for striking a balance between prescription and advice. They felt that the guidance was not overly burdensome and was thorough, detailed and reflected the fact that many partnerships will be at different levels of understanding of child poverty.

5 (41.7%) respondents commented that the guidance could have been more concise and should focus on the essential 'to dos' and key dates. The respondents thought that the guidance covers a lot of material that is already familiar to councils, for example the section on how to organise LSPs.

Many respondents welcomed the fact that there is no need to introduce new structures to fulfil the new duties and the endorsement of the importance of addressing child poverty through wide partnership working rather than leaving it to be tackled solely by children's services.

In regards to the strategy, some respondents felt that the guidance should ensure that strategies demonstrate what difference will be made, with emphasis on how national and local strategies should bridge and articulate gaps between economic and children's outcomes. There was an element of confusion from several respondents about whether it was a requirement to have a stand-alone strategy or not. Likewise, several respondents questioned the need for it to be a document in its own right and argued that since child poverty does not exist in a vacuum, it makes more sense to incorporate it into a broader poverty strategy.

In addition, there were more specific comments made about the guidance as a whole: it needs updating to reflect changes under the Coalition Government; it does not explicitly regard children's rights; it lacks gender analysis, especially the connection between women's poverty and child poverty; and it needs greater acknowledgement around ensuring capacity within local partnerships to respond to duties.

Response and next steps

The consultation has helped us to establish a clearer understanding of how the local duties on Child Poverty will apply to and impact on local authorities and their partners. The responses will provide valuable input to shaping the Government's support offer going forward and ensuring that it responds directly to what the sector is telling us they need.

The Coalition Government places great emphasis on decentralisation and localism. This means less top-down direction and greater encouragement and support for local areas to identify their own priorities and determine locally how best to address those priorities. **Coalition Government Ministers have decided, therefore, that it would not be appropriate or consistent to issue formal statutory guidance and prescriptive regulations in relation to the duties in Part 2.** The Government's preferred approach is to meet the demand shown in the informal and formal consultation responses for information, advice and support initially in the form of a shorter framework guide to Part 2 of the Act, providing clear signposting to a continuing package of sector-led support that will be available to all local authorities and their partners. This Core Offer of Support on child poverty will include a toolkit on how to develop local child poverty needs assessments, which is being developed by Local Government Improvement and Development (LGID) (formerly the Improvement and Development Agency (IDeA)) in conjunction with local data experts, and a short data-sharing guide, as well as other specific products.

The purpose of the Core Offer of Support is to enable knowledge, expertise and practical advice to be available to ensure child poverty can be reduced and its effects mitigated through better targeted and coordinated local action. The Core Offer of Support group will meet with a renewed focus of addressing all the support needs that this report has identified.

We are currently working with colleagues in the Department for Education, DWP and the Department of Communities and Local Government to look at the future framework for sector-led support through organisations such as the Centre for Excellence and Outcomes in Children and Young People's Services (C4EO), LGID and the Regional Improvement and Efficiency Partnerships (RIEPs) and already have strong and growing relationships with each of them. These organisations, as well as many others, are already actively involved in providing a range of support around many of the issues that responses to the consultation addressed. Together we will work to develop a fulsome package of practical support that will ensure that we meet the needs that the consultation has identified.

ANNEX A: Responses to Consultation – Statistics

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?			
There were 27 responses to this question			
Options	Responses		Across Consultation
Yes:	19	70%	50%
Not Sure:	6	22%	16%
No:	2	7%	5%
Key Indicators:			
Helpful/adequate clarity	6	22.2 %	15.8 %
More information on joint working	4	14.8 %	10.5 %
Role of Children’s Trusts	4	14.8 %	10.5 %
Examples of good practice including roles and responsibilities	4	14.8 %	10.5 %

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?			
There were 29 responses to this question			
Options	Responses		Across Consultation
Yes:	13	45%	34%
Not Sure:	11	38%	29%
No:	5	17%	13%
Key Indicators:			
How to engage	4	13.8 %	10.5 %
More information on expected role / nature of involvement	10	34.5 %	26.3 %
Examples of good practice	4	13.8 %	10.5 %
More information on role as employers	3	10.3 %	7.9 %
Value of pooling budgets and sharing resources	3	10.3 %	7.9 %
Role of commissioning	3	10.3 %	7.9 %

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?			
There were 32 responses to this question			
Options	Responses		Across Consultation
Yes:	15	47%	39%
Not Sure:	13	41%	34%
No:	4	13%	11%
Key Indicators:			
How to engage	3	9.4 %	7.9 %
More information on expected role	10	31.3 %	26.3 %
More weight to contribution of VCS	6	18.8 %	15.8 %
Changes under coalition govt	5	15.6 %	13.2 %
Additional other partners	6	18.8 %	15.8 %

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?			
There were 33 responses to this question			
Options	Responses		Across Consultation
Yes:	16	48%	42%
Not Sure:	14	42%	37%
No:	3	9%	8%
Key Indicators:			
Availability of data	9	27.3 %	23.7 %
Good practice examples	4	12.1 %	10.5 %
Additional proposed data-sets	12	36.4 %	31.6 %
Template	6	18.2 %	15.8 %

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?			
There were 28 responses to this question			
Options	Responses		Across Consultation
Yes:	13	46%	34%
Not Sure:	10	36%	26%
No:	5	18%	13%
Key Indicators:			
Duty to share information and good practice	7	25.0 %	18.4 %
Further clarity on partners' contribution	10	35.7 %	26.3 %

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?			
There were 29 responses to this question			
Options	Responses		Across Consultation
Yes:	19	66%	50%
Not Sure:	7	24%	18%
No:	3	10%	8%
Key Indicators:			
Practice examples	2	6.9 %	5.3 %
Further guidance on how to run a good consultation	6	20.7 %	15.8 %

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?			
There were 31 responses to this question			
Options	Responses		Across Consultation
Yes:	15	48%	39%
Not Sure:	11	35%	29%
No:	5	16%	13%
Key Indicators:			
More information and clearer expectations of actions	9	29.0 %	23.7 %
Interface between local and national strategies	3	9.7 %	7.9 %
Additional proposed strategies and plans	6	19.4 %	15.8 %

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?			
There were 29 responses to this question			
Options	Responses		Across Consultation
Not sure:	16	55%	42%
Agree:	9	31%	24%
Disagree:	4	14%	11%
Key Indicators:			
Changes under coalition govt	13	44.8 %	34.2 %
More information	8	27.6 %	21.1 %

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?			
There were 28 responses to this question			
Options	Responses		Across Consultation
Agree:	25	89%	66%
Not sure:	2	7%	5%
Disagree:	1	4%	3%
Key Indicators:			
Updates on national agenda	2	7.1 %	5.3 %
Learning from pilots and Beacons	4	14.3 %	10.5 %
Information sharing sessions	5	17.9 %	13.2 %

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?			
There were 23 responses to this question			
Options	Responses		Across Consultation
Not Sure:	10	43%	26%
Yes:	8	35%	21%
No:	5	22%	13%
Key Indicators:			
Funding	7	30.4 %	18.4 %
Clearer timetable	6	26.1 %	15.8 %
Simultaneous deadlines	3	13.0 %	7.9 %

11 Do you have any further comments on the guidance?			
There were 12 responses to this question			
Options	Responses		Across Consultation
Key Indicators:			
Lacks gender analysis	1	8.3 %	2.6 %
Strikes balance between prescription and advice	3	25.0 %	7.9 %
Could be more concise	5	41.7 %	13.2 %
Useful and clear resource	5	41.7 %	13.2 %

ANNEX B: List of respondents

Organisation	Ref No.
4 Children (Anne Longfield)	20
Audit Commission, The (Kathy Turner)	36
Birmingham City Council (Geoff Bateson)	19
Blackburn with Darwen Borough Council (Beth Speak)	4
Bradford Children's Trust (Steve Wilkinson)	32
Buckinghamshire County Council (Yvette Thomas)	22
Citizens Advice (Katie Lane)	35
Colchester Borough Council (Tina Dopson)	16
Consumer Financial Education Body (Frederick Good)	31
Daniels, Deborah	5
Directorate for Children Young People and Families, Barnsley (Sharon Cooke)	6
Durham Tees Valley Probation Trust (Carina Carey)	15
Equality and Human Rights Commission (Denise Morrisroe)	34
Gateshead Council (Claire Appleby)	10
Hampshire County Council (Colin Payne)	8
Haringey Strategic Partnership (Chloe Surowiec)	33
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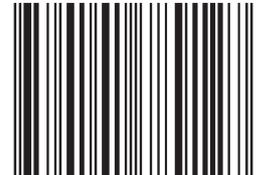
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