



## **Joint Response from Close the Gap, Engender and Scottish Women's Aid to the Call for evidence on the Tackling Child Poverty Delivery Plan 2026-2031**

**March 2025**

### **1. Introduction**

The evidence is clear that child poverty is women's poverty.<sup>1</sup> It is not possible to deliver the First Minister's mission on eradicating child poverty without taking targeted action to address the intersecting gendered inequalities which cause harm to women and constrain their participation and outcomes in life. As national strategic women's organisations, Close the Gap, Engender and Scottish Women's Aid welcome the opportunity to provide expertise on the urgent change needed to meet the child poverty targets. Central to this is delivering targeted interventions to reduce women's poverty, and particularly those who are most marginalised including disabled women, domestic abuse victim-survivors, single parents, racially minoritised women, migrant women, and women with no recourse to public funds.

### **2. Answers to questions**

**We would welcome your views on the proposed key strategic themes and the cross-cutting focus on addressing the needs of families at greatest risk of poverty.**

#### **Q2. Are there other key strategic themes we should consider?**

Our organisations welcome the acknowledgement of the deeply gendered nature of child poverty identified as relevant across all four themes. However, it is essential that this must not be seen as a separate issue and instead this understanding must be integrated in actions to reduce child poverty. Gendered causes and impacts of

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<sup>1</sup> Close the Gap (2021) *Response to Scottish Government consultation on the child poverty delivery plan 2022-26*, available at: <https://www.closesthegap.org.uk/content/resources/Close-the-Gap-Response-to-Scottish-Governments-Consultation-on-Child-Poverty-Delivery-Plan---September-2021-.pdf>

child poverty must be addressed by targeted actions under each of the themes outlined.

The UK is three years into a cost of living crisis that has caused profound harm to women in Scotland.<sup>2</sup> Existing gendered inequalities in access to resources, power, security, and wellbeing have been entrenched. Disabled women, racially minoritised women, younger and older women, single parents, women experiencing domestic abuse, unpaid carers, and migrant and asylum-seeking women have been at particular risk of deepening poverty and destitution.

This has come at a time when many thousands of women in Scotland were already fundamentally struggling. The UK Government has continued to implement a wide range of cuts that violate women's rights. A recent study found that austerity measures have resulted in decreased life expectancy in the UK, with women almost twice as impacted as men.<sup>3</sup> The UK Government has also just announced proposals for deeply harmful austerity measures on disability benefits, which will have severely negative impacts on disabled women and their children.<sup>4</sup> The Government's own impact assessments estimate 250,000 more adults and 50,000 children being pushed into poverty undermining its own child poverty strategy. The largest group affected by the changes will be single women, making up 44% of those losing out, at an average of £1,610 a year.<sup>5</sup>

At the time of writing, we await the publication of the Scottish Government's 2025 child poverty update, which will show the latest progress against the targets of the 2017 Child Poverty (Scotland) Act. However, it is widely acknowledged, including by the Poverty and Inequality Commission, that 'it is unlikely the interim targets will be met', and that 'without immediate and significant action, the Scottish Government will not meet the 2030 targets.' We agree with the Commission's view that to deliver its policy priority of eradicating child poverty, 'the Scottish Government needs to be

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<sup>2</sup> Engender (2022) *Women & the Cost of Living: A Crisis of Deepening Inequality*. Available at: <https://www.engender.org.uk/content/publications/Women-and-the-cost-of-living---updated-copy.pdf>

<sup>3</sup> Berman, Y and Hovland, T (2024) *The Impact of Austerity on Mortality and Life Expectancy*. LSE International Inequalities Institute. Available at: [https://eprints.lse.ac.uk/123915/1/WP\\_139.pdf](https://eprints.lse.ac.uk/123915/1/WP_139.pdf)

<sup>4</sup> UK Women's Budget Group (2025) *Women's Budget Group response to the Government changes to disability benefit*, available at: <https://www.wbg.org.uk/article/wbg-response-to-government-changes-to-disability-benefit/>

<sup>5</sup> UK Women's Budget Group (2025) *Government's own analysis shows largest group to be hit by disability benefit cuts are single women, highlights Women's Budget Group*, available at: <https://www.wbg.org.uk/article/our-immediate-response-to-the-spring-statement-2025/>

much bolder.’<sup>6</sup> The central thread of this bold action must be intersectional gender analysis of the drivers of and solutions to child poverty.

**As you think about each theme, noting the plan must set out measures for the purpose of meeting the 2030 child poverty targets, we would also be keen to hear your views on any or all of the following questions:**

**Q1: What is working well and what actions should Scottish Government and partners either continue to do or to do more of?**

We welcomed the First Minister’s acknowledgement in the 2024-25 Programme for Government that women’s and children’s poverty are inextricably linked. We are clear that this acknowledgement needs to be reflected in the new delivery plan actions. Learning from where policy has failed to meet the needs of women and children is key. We are therefore pleased that the next child poverty progress report will focus on how a gender lens has been applied in relevant policies to tackling child poverty.

We urge Scottish Government to revisit, and build on, the gender analysis in the first child poverty delivery plan (2018-2022). This first plan was explicit in its aim to ‘improve the economic position of women in Scotland’, and to have a focus on ‘tackling gender inequality’. It specifically linked the economic challenges faced by women with child poverty and acknowledged that this link goes beyond paid work: ‘Wider social structures and power relations mean that we cannot simply assume that women share the same access to resources.’<sup>7</sup> It further acknowledged the particular challenges faced by women as ‘traditionally the main carers of children’, understood the gender pay gap as ‘symptomatic of structural gender inequalities in the workplace, education and wider society’, focused on the particular challenges facing single parents, and considered pregnancy and maternity discrimination.<sup>8</sup>

Our organisations were extremely concerned to see the second plan drop much of this language and analysis, even though women’s financial inequality and poverty had become more acute. The plan’s gender-blind use of ‘parents’ throughout obscures the gendered experiences women with childcare responsibilities face in employment, education and training, and in progression. For example, the section on

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<sup>6</sup> Poverty and Inequality Commission (2024) *Child Poverty Delivery Plan progress 2023-2024*, available at: [https://povertyinequality.scot/wp-content/uploads/2024/06/Child\\_Poverty\\_Delivery\\_Plan\\_progress\\_2023-2024\\_Scrutiny\\_by\\_the\\_Poverty\\_and\\_Inequality\\_Commission.pdf](https://povertyinequality.scot/wp-content/uploads/2024/06/Child_Poverty_Delivery_Plan_progress_2023-2024_Scrutiny_by_the_Poverty_and_Inequality_Commission.pdf)

<sup>7</sup> Scottish Government (2018) *Every Child, Every Chance: Tackling child poverty delivery plan 2018-2022*, available at: <https://www.gov.scot/publications/child-chance-tackling-child-poverty-delivery-plan-2018-22/>

<sup>8</sup> Ibid.

childcare does not mention women or mothers specifically, despite clear evidence that childcare provision is the most immediate barrier to women being able to work, train and study.

Building on the gender analysis of the first plan, the new delivery plan should include explicit acknowledgement of ‘the fact that the causes and consequences of poverty, and the routes in and out of poverty, are profoundly affected by gender.’<sup>9</sup> Importantly, it is critical that this understanding informs the new set of actions.

### Extending the reach of the real Living Wage

We welcome the prioritisation of paying the real Living Wage in Scottish Government’s fair work conditionality policy. The extension of real Living Wage coverage in undervalued female-dominated jobs and sectors is an important starting point for ensuring women are appropriately remunerated for their skills. Women are the main beneficiaries of raising the wage floor as they are overrepresented among low paid workers. We therefore welcome that the proportion of women (employees aged 18+) earning the real living wage or more has increased from 83.9% in 2021 to 89.7% in 2022.<sup>10</sup> In addition to low pay, women are also more likely to be in insecure work, including on temporary and zero-hour contracts. It is therefore critical that efforts focus not only on increasing the reach of the real Living Wage but also increasing the number of employers who are Living Hours accredited. There needs to be a more targeted approach which improves pay, terms and conditions in female-dominated sectors such as childcare, social care and retail. This is also an essential step in reducing occupational segregation – if men are to be attracted into the sector, there needs to be an economic imperative to do so. Tackling occupational segregation is also necessary to address sectoral skills shortages.

Our calls:

- Take a more targeted approach to expanding the reach of the real Living Wage and improving women’s terms and conditions by focusing activity on childcare, social care and retail sectors.

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<sup>9</sup> [Tackling child poverty delivery plan 2018-2022: annex 2 - gov.scot](#)

<sup>10</sup> Scottish Government (2024) *Best Start, Bright Future – tackling child poverty: progress report 2023 to 2024*, available at: <https://www.gov.scot/publications/best-start-bright-futures-tackling-child-poverty-progress-report-2023-24/>

## **Q2: Are there policies, actions or approaches that the Scottish Government and/or partners should either stop or do differently?**

The evidence is clear that child poverty is women's poverty. If Scottish Government is to meet the child poverty targets it must refocus its efforts on taking a targeted, gendered approach to the action plan.

### Centre gender equality in the next child poverty delivery plan

It was highly disappointing to our organisations that the second child poverty delivery plan (2022-26) represented a significant step backwards in terms of gender competence. Best Start Bright Futures briefly mentions continued work on the gender pay gap but does not provide further nuance or analysis of the relationship between gender and poverty. There is a short section on domestic abuse, in relation to the Domestic Abuse (Protection) (Scotland) Act 2021, which acknowledges that 'there is a strong relationship between domestic abuse and poverty.'<sup>11</sup> Neither of the child poverty delivery plans include targeted actions to address women's poverty specifically, even with extensive evidence that mothers' poverty is a key driver of child poverty.<sup>12</sup> There is also a lack of action to tackle women's low pay and other causes of the gender pay gap. The deprioritisation of the gender pay gap was highlighted as a key risk by Close the Gap when the gender pay gap action plan was subsumed into the refreshed fair work action plan in 2022. The ongoing lack of focus on the gender pay gap in child poverty and in wider policy is a significant omission given that 70% of children living in poverty are in households where at least one adult is in paid work.

The First Minister's National Advisory Council on Women and Girls (NACWG) has also criticised the lack of gendered approach by Scottish Government in responding to the cost of living crisis, despite women being disproportionately affected, and in its wider anti-poverty work. Its last report noted: 'The NACWG's examination of the Scottish Government's response to the cost of living crisis has found that there is very little evidence of women's experiences being considered, even though it is women who are already most marginalised that have been most sharply affected by the crisis.' NACWG has called for 'the child poverty delivery plan [to] prioritise the needs of marginalised women and girls to meet 2030 targets.' It further recommends

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<sup>11</sup> Ibid.

<sup>12</sup> Women's Budget Group (2025) *Women's and Children's Poverty: Making the Links*, available at: <https://www.wbg.org.uk/wp-content/uploads/2025/01/Womens-and-Childrens-Poverty-report-WBG-2025.pdf>

that ‘gender equality-specific interventions are urgently needed which take an intersectional approach to tackling poverty in Scotland.’<sup>13</sup>

A gendered lens must be applied to the key strategic themes outlined. To use the Scottish Government’s own language, ‘the fact that the causes and consequences of poverty, and the routes in and out of poverty, are profoundly affected by gender.’<sup>14</sup> This gendered lens must centre an intersectional analysis to understand how the most marginalised women experience poverty. This is not evident in the current policy framework. It must be addressed as a priority in the next delivery plan to ensure the most marginalised women and their children are not ignored and left behind.

Our calls:

- Take steps to build improved intersectional gender competence in officials working on child poverty, including at senior level, to ensure that a gender analysis is central to the new delivery plan.

#### Applying a domestic abuse lens

The two delivery plans to date do not examine the relationship between domestic abuse and poverty or consider the additional challenges faced by domestic abuse victim-survivors who also experience financial instability. It is therefore critical that the next child poverty delivery plan is domestic abuse-competent, including economic abuse. Domestic abuse is a significant contributor to women’s poverty. This is necessary to embed an intersectional approach to gender equality, as women and their children experiencing domestic abuse face specific challenges with poverty and financial inequality.

Our calls:

- The next delivery plan must reflect the interconnection between poverty and domestic abuse, and specifically the realities of economic abuse and coerced debt.

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<sup>13</sup> First Minister’s National Advisory Council on Women and Girls (2024) *Phase Two Report 2024*, available at: <https://www.generationequal.scot/second-focus-of-scrutiny/>

<sup>14</sup> [Tackling child poverty delivery plan 2018-2022: annex 2 - gov.scot](#)

## Theme 1: Increasing earned incomes by supporting and providing opportunities for parents and carers, to enter, sustain and progress in work.

### *Gender-competent employability support*

The Scottish Government's employability strategy, No One Left Behind (NOLB) is described as 'placing people at the centre of the design and delivery of employability services'.<sup>15</sup> The recent NOLB strategic plan delivery plan<sup>16</sup> acknowledges that 'Child poverty rates remain too high, with parents continuing to experience barriers to entering and increasing their income from employment. There is a strong gendered element to this, with women more likely to be employed in low-paid, part time work'. It further notes that 'significant barriers to accessing fair work in the labour market persist for women, disabled people, unpaid carers, people with convictions and individuals from racialised minorities who continue to experience lower employment rates than others.' Despite this, the strategic plan does not set out how women's specific needs will be met. There are no actions or outcomes to deliver gender-competent employability support, no actions to centre tackling occupational segregation and women's concentration in low paid work in employability activity, and no recognition that capacity needs to be built in employability services to deliver change for women.

Priority 3 in the strategic plan is tackling child poverty by increasing parental income from employment. Three actions are set out which include working with partners including the public and third sector to take a targeted approach to engaging parents; working with partners and employer engagement colleagues to enhance the offer to parents who are in work; and work with partners to lever employability resources to address workforce challenges in sectors which impact on parents' ability to enter employment, such as childcare. The gender-blind use of 'parents' throughout the new strategic plan typifies how gendered barriers to employment, education and training are ignored. There is no acknowledgement of the intrinsic connection between women's propensity to do unpaid childcare and the constraints this creates on their ability to engage with the labour market as a gendered inequality.

Despite the ambitions of NOLB, there is mounting evidence that there has been little change in how employability support is delivered. The implementation evaluation of

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<sup>15</sup> See <https://www.employabilityinscotland.com/policy/no-one-left-behind/>

<sup>16</sup> Scottish Government (2024) *No One Left Behind: Strategic delivery plan*, available at: <https://www.gov.scot/publications/no-one-left-behind-employability-strategic-plan-2024-2027/pages/5/>

NOLB identified ongoing gendered differences in participation and outcomes including:

- Men were more likely than women to have received support to access a volunteering or work placement (29% compared with 21%).
- Childcare responsibilities preventing access to training or work was reported as an issue by 53% of single parents, 25% of all women, and 5% of men.
- Worries about money at the first engagement with the service were more frequently reported by single parents (47%) compared with all survey respondents (34%).
- Single parents were twice as likely to strongly disagree that employment services treated them with dignity and respect (10% compared to 5% of those who were not single parents).
- Single parents were also more than twice as likely to strongly disagree that services respected their privacy (9% compared with 4% of those who were not single parents).<sup>17</sup>

There is no intersectional data used in the evaluation so there is no evaluation of disabled women's and racially minoritised women's experiences in engaging with employability services.

Research by Close the Gap on Black and minority ethnic women's (BME) employment found that employability services were not commonly accessed amongst women surveyed. Participants in the research highlighted how some employability services seem to channel BME women into low-paid, gendered, precarious work, such as cleaning or retail, rather than actively disrupting occupational segregation and adopting a personalised approach to support.<sup>18</sup>

Close the Gap is currently undertaking mixed methods research on disabled women's experiences of employment in Scotland. Emerging findings from the online survey indicate that employability services are failing to meet the needs of most disabled women. Of those who had accessed employability support, only a third reported that it had met their needs, while a third said that it had partially met their needs, and a third said it had not met their needs. When asked about why it had not met their needs, disabled women highlighted a range of issues including:

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<sup>17</sup> Scottish Government (2023) *Implementation Evaluation of No One Left Behind and Young Person's Guarantee* <https://www.gov.scot/publications/implementation-evaluation-no-one-left-behind-young-persons-guarantee/documents/>

<sup>18</sup> Close the Gap (2019) *Still Not Visible: Research on Black and minority ethnic women's experiences of employment in Scotland*, available at: [https://www.closesthegap.org.uk/content/resources/1557499847\\_Still-Not-Visible.pdf](https://www.closesthegap.org.uk/content/resources/1557499847_Still-Not-Visible.pdf)

- it was not appropriate for their skill level and experience (53%);
- it was not relevant to their goal of getting secure employment (40%);
- they did not gain a job as a result (28%);
- their access needs were not met at all (17%) or were met too late (4%);
- they felt discriminated against when accessing the service (11%);
- the service was inaccessible due to location and or/physical infrastructure (9%).<sup>19</sup>

The evidence is clear that generic employability programmes replicate gendered patterns of skills acquisition and employment, entrenching occupational segregation and widening the gender pay gap. The job-matching approaches adopted by these programmes are often inappropriate as women are funnelled into low-paid, inflexible jobs such as retail and care, which they inevitably leave as a result of these roles being incompatible with their caring responsibilities and other complexities of their lives. Occupational segregation is a cause and a consequence of women's inequality in employment, acting as a barrier to women's progression in the workplace, and entrenching women's in-work poverty and child poverty. To be effective for women, employability services must take account of occupational segregation, stereotyping and norms around paid and unpaid work, racism and disability discrimination, women's childcare roles and the cost of childcare, women's experiences of men's violence, women's greater reliance on public transport, disabled women's access needs including recognition that they have more expensive transport needs.

We draw attention to a good practice employability initiative targeted at single parents. In 2024, One Parent Families Scotland and Public Health Scotland were named finalists in the Employer Partnership category at the ERSA 2024 Employability Awards for a jointly delivered lone parent partnership project - supporting single parents to access opportunities for training and employment.

Single parent participants in the pathway benefitted from:

- **Pre-Employment Training:** A six-week OPFS Academy programme covering work-family balance, financial planning, and essential skills, with guaranteed interviews for participants.
- **Paid Employment Opportunities:** The opportunity to apply for an 18-month work contract with Public Health Scotland.
- **Skills Development:** Access to SCQF Level 5 or 6 in Business Administration through the City of Glasgow College to enhance their skills and employability.

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<sup>19</sup> Close the Gap (forthcoming) *Research on disabled women's experiences of employment in Scotland*

- **Comprehensive Support:** Holistic support and assistance covering childcare and travel costs to ease financial pressures.<sup>20</sup>

This work has been overwhelmingly positive, and we recommend that the learning from this should be used to design further opportunities and for this to be replicated and built upon across Scotland.

Our calls:

- Design and deliver targeted employability support for disabled women that is accessible, flexible, appropriate to skill level, and that proactively challenges occupational segregation.
- Use learning from the One Parent Families Scotland and Public Health Scotland employability project to expand targeted support to single parents which provides tailored support and high-quality workplace opportunities.
- Design and deliver targeted employability support for racially minoritised women that is flexible, appropriate to skill level, anti-racist and that proactively challenges occupational segregation.
- Employability programmes should provide support for childcare costs including childcare for disabled children which has a higher cost attached.
- Ensure that childcare support provided through employability programmes does not negatively interact with funded childcare hours.
- Employability programmes should recognise that women are more reliant on public transport, and that disabled women have higher transport costs.
- The needs of domestic abuse survivors should also be targeted such as enabling participants to leave and re-engage, rather than it being a one-time offer.
- Intersectional gender competence should be built in employability policy officials and local employability support staff.

### Refresh the National Strategy for Economic Transformation

The National Strategy for Economic Transformation (NSET) is identified in delivery plans as an important element of achieving both child poverty targets and a wellbeing economy. Our organisations have been very critical of NSET and have raised repeated concerns about the lack of gender analysis, and its failure to engage with women's economic inequality. We continue to call for a refresh of NSET and to use the opportunity to understand the gendered impact of the current strategy and

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<sup>20</sup> Further information on the OPFS and Public Health Scotland employability project can be found at: <https://opfs.org.uk/get-involved/news-and-events/news/pioneering-lone-parent-employment-partnership/>

take action to redress this. This is crucial to ensure women can engage in and benefit equally from Scotland's economy and that the current national ten-year strategy does not ultimately work to worsen gender inequality.<sup>21</sup>

The current framing of NSET both underestimates and obscures women's contribution to Scotland's economy. Far from being transformational, it perpetuates a traditional, neoclassical understanding of what is included within a national economy and, as a result, disproportionately benefits men and the jobs in which they are more likely to work. A critical omission is the complete absence of any attention on women's unpaid work which props up the economy in Scotland. Scottish Government research estimates the value of unpaid care to be around £36 billion annually.

NSET relies on gross domestic product as the main way to measure the success of our economy. As a result, this skews investment towards male-dominated industries and sectors. The strategy does not acknowledge the undervaluation of women's work, the unpaid care economy, or the critical importance of investing in childcare and social care, as vital social infrastructure, to improve women's access to the paid labour market.

Our calls:

- Refresh NSET to centre gender equality, including a focus on counting and valuing women's unpaid work.
- Designate childcare and social care key growth sectors so that care is viewed as vital social infrastructure, and the requisite policy attention and investment is allocated.
- In line with the primary prevention approach of Equally Safe, integrate an understanding of the links between violence against women and girls and poverty in economic policymaking and implementation.

### Design and deliver high-quality, accessible, affordable childcare

Close the Gap and One Parent Families Scotland's joint position paper on childcare, *A Childcare System for All: Putting gender equality at the centre of Scotland's childcare*

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<sup>21</sup> Scottish Women's Aid (2024) *Post-Legislative Scrutiny of the Child Poverty (Scotland) Act 2017*, available at: [SWA-PLS-Child-Poverty-Scotland-Act-Sept-2024.pdf](https://www.swa.org.uk/publications/post-legislative-scrutiny-of-the-child-poverty-scotland-act-2017); Engender (2024) *8 Steps to Towards Women's Equality in Scotland*, available at: <https://www.engender.org.uk/content/publications/8stepstowardswomensequality.pdf>

*policy*<sup>22</sup> sets out the importance of childcare to women's lives, especially women who are single parents. The lack of affordable and flexible childcare reinforces women's social, economic and labour market inequality because it is women who are more likely to do the bulk of unpaid childcare. This significantly constrains women's engagement with the labour market, and whether they are able to study or do training. Childcare provision routinely determines whether women have a job, they type of job they have, the hours they work, and the amount of pay they get. Ensuring that there is high-quality, accessible and affordable childcare for all women and their families is a necessary step to reduce child poverty.

Close the Gap has welcomed the introduction of the 1140 funded hours. This expansion has been a positive step towards improving access to affordable and flexible childcare in Scotland. However, current commitments must be the starting point, rather than the end point of reform.

There remain critical system challenges which manifest in a lack of affordable, flexible childcare for women, especially those on low incomes. In particular, the current system fails to meet the needs of children under three years, and disabled children<sup>23</sup>. This has a disproportionate impact on women who are single parents, especially young single mothers, who are already more likely to experience deeper and more persistent poverty. Coram's Childcare Survey 2024 found that the cost of childcare is rising and there is a major gap in provision which in Scotland was particularly severe for under 2 year olds, disabled children and school-age childcare.<sup>24</sup> Research by One Parent Families Scotland found that over a fifth (21%) of single parent participations were not able to afford childcare at all<sup>25</sup> and a data from Scottish Government found that single parents were twice as likely as dual-earner households to report significant difficulties paying for childcare.<sup>26</sup>

The vision articulated by Close the Gap and One Parent Families Scotland, and endorsed by 25 civil society organisations, proposes a childcare system which works for everyone. It contains a set of principles which should drive the next stages in the

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<sup>22</sup> Close the Gap and One Parent Families Scotland (2023) *A Childcare System for All: Putting gender equality at the centre of Scotland's childcare policy*, available at: <https://www.closesthegap.org.uk/content/resources/CtG-and-OPFS---A-childcare-system-for-all-FINAL.pdf>

<sup>23</sup> Close the Gap and One Parent Families Scotland (2023) *A Childcare System for All: Putting gender equality at the centre of Scotland's childcare policy*, available at: <https://www.closesthegap.org.uk/content/resources/CtG-and-OPFS---A-childcare-system-for-all-FINAL.pdf>

<sup>24</sup> Coram (2024) *Childcare Survey 2024*, available at: <https://www.coram.org.uk/resource/childcare-survey-2024/>

<sup>25</sup> One Parent Families Scotland (2022) *Living Without a Lifeline*, available at: <https://opfs.org.uk/policy-and-campaigns/policy-research/living-without-a-lifeline/>

<sup>26</sup> One Parent Families Scotland (2024) *Pre-budget briefing 2024-25: Policies for single parents*, available at: <https://opfs.org.uk/wp-content/uploads/2024/12/OPFS-Scotgov-Pre-Budget-Briefing-2025-26.pdf>

development of Scotland's childcare offer. The principles describe a system of childcare that promotes women's socio-economic and labour market equality, advances children's rights, and addresses child poverty. The principles are:

- A system of childcare that puts choice for all families at the heart of provision.
- A universal funded entitlement of 50 hours per week for children aged 6 months and above that is free at the point of use for all families.
- A high quality service which delivers positive outcomes for children and realises children's rights.
- A diverse and skilled childcare workforce that is valued, paid fairly, and gender balanced.
- Flexible delivery that enables families to access childcare when they need and want it.
- Investment in childcare should be considered as necessary infrastructure for a sustainable wellbeing economy and a good society.
- Work towards a childcare system that is not based on profit-making.

Our calls:

- Commit to the ambition to offer the choice of up to 50 hours' early learning and school-age childcare, which is free at the point of use, and design a pathway to implementation.
- Accelerate progress on expanding universal childcare to one and two year olds, and the creation of a system of funded school-age childcare.
- Prioritise work on making childcare more flexible, using key learning from sector leaders on flexible services including Flexible Childcare Services Scotland.
- Use state wage-setting powers to increase the pay of all early learning and childcare workers to the real Living Wage, with a more ambitious target set thereafter.
- Designate childcare and social care key growth sectors so that care is viewed as vital social infrastructure, and the requisite policy attention and investment is allocated.

Theme 2: 'Reducing the costs of living and maximising incomes from social security to allow families to live dignified lives and meet their basic needs.'

Theme 2 is particularly important to progress with additional actions that target women because women are more reliant on inadequate and shrinking social security

entitlements than men.<sup>27</sup> This is due to women's propensity to have caring roles and be second earners. Consistently, women comprise the majority of applicants for devolved direct application social security payments in Scotland. For example, data shows that 82% of applicants to the five family payments are women.<sup>28</sup>

Ensuring women who have caring roles and/or who are in lower-paid, insecure work can access adequate levels of social security to access a liveable income is essential to preventing child poverty. Women tend to act as managers of household budgets, particularly around spending on children and non-durable items like food and domestic products, that are susceptible to price hikes during periods of inflation. Research by the Living Wage Foundation found that women were considerably more likely to have fallen behind with bills and to have skipped meals due to rising costs.<sup>29</sup> Cash-first approaches and access to financial support to maximise women's incomes is therefore a necessary step in tackling child poverty.

### *Targeted support for domestic abuse survivors*

We welcome the work undertaken to date on the Fund to Leave. SWA and the Scottish Government ran the pilot from December 2023 to March 2024, supporting women experiencing domestic abuse to prepare for separation, separate, and stay separate.<sup>30</sup> 1109 women and children were supported by the pilot. Scottish Government now needs to commit to creating a permanent Fund to Leave and for this to be extended to all victim-survivors in Scotland, including women with No Recourse to Public Funds (NRPF).

The next delivery plan must address the ongoing impacts of the cost of living crisis, as well as the disproportionate impacts of the Covid-19 pandemic on women. Scottish Women's Aid's Cost of Leaving campaign highlighted the effects of rising food and energy costs on women and children experiencing domestic abuse and on their ability to leave abusive partners. It must also take account that the social security system can be used to perpetrate financial abuse, for instance, by withholding benefits intended for victim-survivors, falsely claiming benefits in a victim-survivor's name, or falsely reporting victim-survivors for benefits fraud.

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<sup>27</sup> Engender (2022) Women & the Cost of Living: A Crisis of Deepening Inequality. Available at:

<https://www.engender.org.uk/content/publications/Women-and-the-cost-of-living---updated-copy.pdf>

<sup>28</sup> <https://www.socialsecurity.gov.scot/asset-storage/production/downloads/Social-Security-Scotland-Five-Family-Payments-Client-Survey-Dec-2023-Mar-2024.pdf>

<sup>29</sup> Living Wage Foundation (2022) "Low paid work and cost-of-living crisis disproportionately affecting women." Available at: <https://www.livingwage.org.uk/news/low-paid-work-and-cost-living-crisis-disproportionately-affecting-women>

<sup>30</sup> Scottish Government, 'Support to leave an abusive relationship', 17 October 2023, available at: <https://www.gov.scot/news/support-to-leave-an-abusive-relationship/>

Our calls:

- Make the Fund to Leave permanent, and extend to all victim-survivors in Scotland, including women with NRPF.

### *Scottish Welfare Fund*

The Scottish Welfare Fund (SWF) requires reform to meet the needs of the most marginalised women, and other minoritised and low-income groups to support levels of social security support. Recent independent review of the SWF found significant shortfalls in investment, gaps in equality data, and the need for revised statutory guidance.<sup>31</sup> Additional Scottish Government funding of £20m for the SWF in 2024/25 is extremely welcome and in line with the funding gaps highlighted by local authorities. It is vital that this is sustained in future budgets, alongside action to ensure the funds reach those most in need.

SWF has been increasingly accessed by women since its creation in 2013,<sup>32</sup> reflecting the gendered nature of poverty and insecurity in Scotland. Women are around 60% and 54% respectively of those who access the Community Care Grant and Crisis Grants. However, a systematic gender analysis of SWF demand, use, parameters and guidance has never been undertaken. The 2023 review and subsequent Scottish Government action plan have a very limited focus on gender and do not engage with intersectionality.<sup>33</sup> Gender analysis is needed to equip the SWF to support the most marginalised groups of women, including unpaid carers, migrant women and – when possible – women with NRPF status.

Our calls:

- Revise statutory guidance to integrate an intersectional gender analysis of SWF's structures and delivery plan, including a focus on improved data collection and use.
- Ringfence increased SWF funding at an additional £20m per annum and uplift annually in line with inflation.
- Expand access to SWF for the most marginalised groups of women with dedicated streams to support unpaid carers, migrant women and women with NRPF when possible.

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<sup>31</sup> Scottish Government (2023) *Review of the Scottish Welfare Fund: Main Report*

<sup>32</sup> Scottish Government (2023) *Scottish Welfare Fund Statistics: Update to 31 December 2022*

<sup>33</sup> Scottish Government (2023) *Scottish Welfare Fund: action plan*

## *Social Security for Unpaid Carers*

Unpaid care work is a major cause of gendered poverty, undermining financial security for women and girls across generations. Unpaid carers from BME communities, in rural areas, and those caring for disabled people face specific challenges and added costs. These group of unpaid carers are on their knees following the pandemic and the cost of living crisis, but are routinely excluded from forms of government support.<sup>34</sup>

Scottish Government's Carer Support Payment and Carer's Allowance Supplement amount to a maximum of £2.66 per hour<sup>35</sup> for essential and skilled care work. The real Living Wage in the UK is currently £12.60. The earnings threshold for Carer Support Payment is set at £196 per week, restricting unpaid carers to low-wage employment and increasing the risk of poverty into retirement.<sup>36</sup> This egregiously inadequate support discriminates against women, who are 70% of those in receipt of carers' social security payments and twice as likely to give up paid work to provide unpaid care.

With the new Carer Support Payment, Scottish Government has an opportunity to rectify this historic failure of support for unpaid carers. We are resolute in calling for a real Living Wage for carers to reflect the value of unpaid care to Scotland's economy and society. The Scottish Government's longer-term proposals to improve access to education and employment are welcome, as is an Additional Person Payment for those with multiple caring roles. However, timescales for this are unclear, and the Additional Person Payment is proposed at £10 per week for a minimum of 20 hours of care – a maximum rate of 50p per hour and a quarter of the basic rate of Carer Support Payment.

Currently, there are restrictions on access to Carer Support Payment for both younger and older people who are providing unpaid care. This discriminates against young women and girls, who are the majority of young carers, and older women, who are more likely to experience pension poverty than men.<sup>37</sup> We are calling for

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<sup>34</sup> Until recently carers were not prioritised for 'safety net' support within the Scottish Welfare Fund, they did not receive vital Cost of Living Payments from the UK Government, and were not eligible for Covid-19 vaccine in 2024.

<sup>35</sup> Carer Support Payment is £81.90 per week for a minimum 35 hours of caring, or £2.34 an hour. The Scottish Government's supplement is £288.60 twice a year, or £11.10 per week – a maximum rate of £0.32 per hour.

<sup>36</sup> Carers Scotland and the Centre for Care (2024) *Valuing Carers 2022: Scotland*, available at: <https://www.carersuk.org/reports/valuing-carers-2022-scotland/>

<sup>37</sup> Age UK (2021) *New Age UK analysis finds one in five UK women pensioners now living*

eligibility for Carer Support Payment to be extended to 16 to 19 year olds in full-time, non-advanced education and for a new support payment for older carers. Carers' contributions should be recognised regardless of age, educational status, or separate income through employment or social security.

Our calls:

- Commit to a real Living Wage for unpaid carers through the Scottish Carer Supplement that does not lead to income reductions for those they care for.
- Publish plans to expand access to Carer Support Payment with regards to education, employment and multiple caring roles.
- Pay the proposed Additional Person Payment at least at the same rate as Carer Support Payment.
- Extend eligibility for Carer Support Payment to 16 to 19 year olds in full-time, non-advanced education.
- Introduce a specific recognition payment for older unpaid carers who cannot be paid Carer Support Payment due to receiving a State Pension.

### *Reform of Universal Credit*

The UK social security system has been heavily critiqued for its misogynist design and inequitable impact. In 2018, the UN's Special Rapporteur on extreme poverty and human rights described Universal Credit by saying, "If you got a group of misogynists together in a room and said 'how can we make a system that works for men but not women?' they wouldn't have come up with too many other ideas than what's in place."<sup>38</sup> Action to address this ingrained gender injustice is urgently needed for women and for their children. Urgent changes are needed to the Universal Credit system to tackle this. The UK Government must introduce automatic split payments and scrap the 5-week wait, and the Scottish Government must do everything in its power to influence this.

The policy of single household payments of Universal Credit (UC) assumes that resources are shared equally within households. It undermines women's access to an independent income and greatly increases risks of poverty and domestic abuse for women and children.<sup>39</sup> The Scottish Government has committed to individual UC

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*in poverty*, available at: <https://www.ageuk.org.uk/latest-press/articles/2021/new-age-uk-analysis-finds-one-in-five-uk-women-pensioners-now-living-in-poverty/>

<sup>38</sup> Engender (2025) *ICESCR: Updates shadow report, January 2025*, available at: <https://www.engender.org.uk/content/publications/FinalICESCR-briefing2025.pdf>

<sup>39</sup> Engender (2016) *Gender Matters in Social Security: Individual Payments of Universal*

payments, but delivery is dependent on the UK Government's impact assessment, and both governments have failed to prioritise achieving this in a timely fashion. The two-child limit within UC and Child Tax Credit systematically discriminates against women, penalising them for their reproductive and family circumstances. We welcome the recent commitment from Scottish Government to mitigate the two-child limit. Our organisations have long campaigned for its abolishment. It is vital that the mitigation mechanism developed is domestic abuse-competent and supports and empowers victim-survivors.

Our calls:

- The mechanism to mitigate the two-child limit must be gender- and domestic abuse-competent, and support and empower victim-survivors.
- Scottish Government must engage with the UK Government in a timely manner to enable the delivery of automatic, individual payments of Universal Credit.

### *Reducing Costs of Care - Support for Disabled Women*

Social care charging and lack of access to social care support is an ongoing area that disproportionately impacts the higher rates of poverty experienced by disabled women and their carers.<sup>40</sup> Given low rates of social security support, the cost of living crisis is pushing hundreds of thousands of unpaid carers into extreme financial hardship. Carers Scotland found that 50% of carers were unable to manage expenses in March 2022, before the height of the crisis.<sup>41</sup> Subsequent energy and transport price hikes had devastating impacts on older and disabled people and their carers, many of whom are disabled women themselves. Scottish Government has committed to remove fees for social care support received in the home. This would bring some urgently needed relief to low-income groups in receipt of social care and their unpaid carers. However, delivery has been repeatedly delayed.<sup>42</sup> In the immediate term, Scottish Government should make it a statutory requirement for all local authorities to consider Disability Related Expenditure when calculating total client contributions for non-residential care. In England, such a requirement is

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Credit. Available at: <https://www.engender.org.uk/content/publications/Gender-matters-in-social-security---individual-payments-of-universal-credit.pdf>

<sup>40</sup> Glasgow Disability Alliance and Scottish Women's Budget Group (2023) *Briefing paper*, available at: <https://gda.scot/resources/gda-and-scottish-womens-budget-group-briefing-paper-november-2023/>

<sup>41</sup> Carers Scotland (2022) 'We are eating one meal a day and will not put the heating on in the house' State of Caring in Scotland 2022. Available at: <https://www.carersuk.org/media/n3kd03ji/state-of-caring-in-scotland-a-cost-of-living-crisis-for-carers-final.pdf>

<sup>42</sup> Scottish Government (2024) *Removal of non-residential social care charging: FOI release*, available at: <https://www.gov.scot/publications/foi-202300387766/>

accompanied by a more expansive definition of Disability Related Expenditure within statutory guidance.

Our calls:

- Accelerate delivery of the existing commitment to abolish non-residential social care charging.
- Create statutory guidance that requires local authorities to take clearly defined Disability Related Expenditure into account when calculating social care contributions.

### **Q3: Are there new policies, actions or approaches that Scottish Government should consider implementing?**

#### *Address the undervaluation of women's work*

Work that is seen as 'women's work', such as cleaning, care and retail, is systematically undervalued in the labour market because this work is done by women. The concept of undervaluation underpins gendered experiences of low pay, poverty, occupational segregation and the gender pay gap.<sup>43</sup> Tackling undervaluation is also necessary to reduce occupational segregation. If more men are to be encouraged into stereotypically female roles such as care and childcare, there needs to be an economic imperative to do so.

Covid-19 illuminated the critical role 'women's work' in sectors such as care, childcare, nursing, and retail play in Scotland's economy. Although these workers were essential to a successful pandemic response, they remain undervalued, underpaid, and underprotected.<sup>44</sup> For example, the designation of care as low-skilled contributes to the economy-wide undervaluation of care work more broadly. The undervaluation of the social care workforce is sustained by norms and stereotypes around gender roles and assumptions relating to women's and men's capabilities and interests.<sup>45</sup> The idea that women are intrinsically more caring is used to justify the low pay attached to care work in the labour market, with perceived job satisfaction a substitute for fair pay.

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<sup>43</sup> Grimshaw, Damien and Jill Rubery (2007) *Undervaluing Women's Work*, Equal Opportunities Commission

<sup>44</sup> Close the Gap and Engender (2020) *Gender and Economic Recovery*, available at: <https://www.closesthegap.org.uk/content/resources/Gender--Economic-Recovery---Engender-and-Close-the-Gap.pdf>

<sup>45</sup> Close the Gap (2020) *Close the Gap submission to the Independent Review of Adult Social Care* available at: <https://www.closesthegap.org.uk/content/resources/Close-the-Gap-submission-to-the-Independent-Review-of-Adult-Social-Care.pdf>

Although the undervaluation of women's work is a driver of women's in-work poverty and therefore child poverty, there has been no specific focus on addressing this systemic economic injustice. As mentioned in our answer to Q2, we welcome the prioritisation of paying the real Living Wage in Scottish Government's fair work conditionality policy as it is an important starting point for ensuring women are appropriately remunerated for their skills. However, the Living Wage is not a panacea for undervaluation as it does not address the crux of the low pay problem, which is that this work is undervalued because it is predominantly women who do the work. Increasing the pay of undervalued work alone will be insufficient to better recognise the status and skills of the women working in female-dominated jobs.

The 2019 gender pay gap action plan, *A Fairer Scotland for Women*, acknowledged that the undervaluation of women's work was a key driver of Scotland pay gap. However, it did not include any actions to tackle this. In 2021, Scottish Government published research<sup>46</sup> it commissioned on international mechanisms to revalue women's low-paid work in sectors such as social care, early learning and childcare, retail, and cleaning. The research makes a number of recommendations on job evaluation, collective bargaining, public procurement and gender pay gap reporting. There has been no formal response to the research from Scottish Government. In the refreshed fair work action plan Scottish Government again stopped short of committing to action on undervaluation, instead setting out it would 'draw lessons from other comparable economies on what is achievable and what has worked in different contexts'. The lack of action to realise pay justice for low-income women is a critical failure of Scottish Government's flagship fair work policy. It undermines not only efforts to narrow the gender pay gap, but it sustains women's and children's poverty. There is no fair work in Scotland without fair work for women.

Our calls:

- Accelerate the implementation of sectoral bargaining in social care, including the establishment of the sector-level body for social care workers, as proposed by the Fair Work Convention in its *Fair Work in Scotland's Social Care Sector* report.
- Issue guidance to all public sector employers on the need to update and maintain job evaluation schemes and ensure that new and changed jobs are evaluated and correctly graded to achieve equal pay for work of equal value in the post-Covid-19 context.

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<sup>46</sup> Scottish Government (2021) *International Mechanisms to Revalue Women's Work: Research exploring and evaluating international mechanisms that aim to revalue or result in the revaluation of women's work*, available at: <https://www.gov.scot/publications/international-mechanisms-revalue-womens-work-research-exploring-evaluating-international-mechanisms-aim-revalue-result-revaluation-womens-work/>

- Use state wage-setting powers to increase the pay of all early learning and childcare workers to the real Living Wage, with a more ambitious target set thereafter.

### Require public sector employers to publish and report on gender pay gap action plans

Women are the majority of public sector workforce, concentrated in stereotypically female, low-paid, undervalued work such as homecare, teaching assistants, admin, cleaning and catering and healthcare assistants. Listed public sector employers in Scotland have been required to report their gender pay gap since 2013 under the Scottish-specific duties of the public sector equality duty. It is reasonable to expect that performance of this duty to have improved over the course of a decade. However, the opposite is true, with a steady and marked decline in performance with increasing numbers of public bodies failing to publish their pay gap as legally required, and fewer actions being taken to tackle the causes of organisational pay gaps. Analysis by Close the Gap found that in 2023, only 87% of public bodies had published their gender pay gap as required. Public bodies that had not done so had either published no figure at all, or published a figure that was non-compliant, for example, excluding certain groups of staff. The vast majority (82%) of public bodies published a pay gap of over 5%, but fewer than one in ten (9%) of these had published an equality outcome or action that addressed its causes.<sup>47</sup>

Close the Gap's five-year assessment of reporting by Scottish employers under the UK gender pay gap reporting regulations found also that the vast majority of employers are not using their data to develop substantive action to tackle the gender pay gap.<sup>48</sup> In 2022, 75% of employers had published a notable gender pay gap but had failed to publish actions to address it. This analysis, along with other Close the Gap assessments of Scottish and UK gender pay gap reporting, aligns with UK and international evidence on the necessary regulation to secure employer action on the gender pay gap. The common flaw in both the Scottish-specific duty on gender pay gap reporting and the UK regulations is that neither require employers to develop an action plan to tackle the gender pay gap. Wider UK and international evidence also shows that employers are unlikely to take action on gender equality unless they are compelled to do so by law.<sup>49</sup> A 2020 analysis of international gender pay gap

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<sup>47</sup> Close the Gap (forthcoming) *The case for mandatory gender pay gap actions plans in the public sector*

<sup>48</sup> Close the Gap (2023) *Positive shifts, persistent problems: A five year analysis of Scottish employer gender pay gap reporting*

<sup>49</sup> Global Institute for Women's Leadership (2020) *Gender pay gap reporting: A comparative analysis*; IFF Research (2015) *Company Reporting: Gender pay data, Government Equalities Office*; Winterbotham et al

reporting regimes found that, in order to be effective, reporting requirements must include mandatory, measurable action plans and clear mechanisms for accountability and transparency.<sup>50</sup> It is clear that reporting alone does not compel employers to take action on the gender pay gap, and that this needs to be rectified if Scotland's public sector employers are to tackle the causes of pay gaps that sustain women's in-work poverty.

Our call:

- As part of the review of the public sector equality duty, require public bodies to publish and report progress on a gender pay gap action plan.

Issue Ministerial guidance to local authorities and NHS boards to direct them to take a gendered approach to tackling child poverty

Under the Child Poverty (Scotland) Act 2017, local authorities and NHS boards are required to work together to produce annual local child poverty action reports (LCPARs). These reports should include a description of activities they have undertaken during the reporting year to reduce child poverty planned future actions to address child poverty in their area.

Scottish Government guidance on LCPARs notes that the Act requires local authorities and NHS boards to 'describe measures (taken and proposed) relating to children in households whose income or expenditure is adversely affected because a member of the household has one or more protected characteristic'.<sup>51</sup> There is no mention of the link between women's poverty and child poverty, and no guidance on the need to take an intersectional approach to local activities. There is widespread evidence on the lack of gender competence in public bodies and their failure to mainstream gender equality into their functions.<sup>52</sup> It therefore follows that without specific direction from Scottish Government on the need for gender-competent action, local authorities and NHS boards do not meaningfully engage with gender, and do not design activities that specifically target gendered barriers. This is evidenced in Scottish Government's review of year 4 (2021-2022) local child poverty

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(2014) *Company Reporting: gender pay gap data*, Government Equalities Office: London; and Close the Gap (2013) *Missing out on the benefits: Summary of research on the reporting of the gender pay gap in Scotland*

<sup>50</sup> The Global Institute for Women's Leadership et al (2021) *Bridging the gap? An analysis of gender pay gap reporting in six countries*

<sup>51</sup> Scottish Government (2022) *Developing a local child poverty action report: guidance*, available at:

<https://www.gov.scot/publications/developing-a-local-child-poverty-action-report-guidance/documents/>

<sup>52</sup> See for example: Close the Gap (2025) *Submission to the Equality, Human Rights and Civil Justice Committee on the review of the public sector equality duty*, and Close the Gap (2025) *Response to the draft equality and human rights mainstreaming strategy*.

action reports.<sup>53</sup> Aside from a reference to mandated action to provide support to pregnant women, there is no mention of women's poverty or gendered approaches being taken at the local level.

Similarly Improvement Service's analysis of Year 4 and Year 5 reports LCPARs also indicates a generalised approach to child poverty with no specific focused action to consciously target women's poverty or related gendered barriers.<sup>54</sup> The analysis found that even the priority group of young mothers, which most obviously relates to women, was not considered from a gendered perspective. It notes that 'young mothers under the age of 25 were given comprehensive consideration in 1 report and cursory consideration in 19 reports [in the sample reviewed].'

The available analysis of LCPARs demonstrates that not only are local authorities and NHS boards not thinking about the link between women's poverty and child poverty, but review exercises by Scottish Government and other public bodies are not integrating gender analysis in evaluation methods. Scottish Government must demonstrate leadership, and provide clear direction to local delivery organisations on the need to tackle women's poverty to reduce child poverty.

Our calls:

- Update guidance on LCPARS to direct local authorities and NHS boards to develop targeted gender-competent action that will tackle the causes of women's poverty as a necessary step in reducing child poverty.

#### Support victim-survivors of domestic abuse to access child maintenance

While the child maintenance system is within the competence of the UK Government, there are actions that the Scottish Government can take to ensure that women and children experiencing domestic abuse have the resources that they need which prevents them from living in poverty.

Our calls:

- The next delivery plan must engage with the specific challenges that the child maintenance system poses for victim-survivors, including the fact that inconsistent and withheld payments can be used as a form of economic abuse that can lead to financial hardship for children. Women should be able to safely receive what their children are entitled to.

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<sup>53</sup> Scottish Government (2023) *Local child poverty action reports: year 4 (2021-2022)*, available at: <https://www.gov.scot/publications/review-year-4-2021-2022-local-child-poverty-action-reports/documents/>

<sup>54</sup> Improvement Service, *Analysis of Year and Year 5 reports*, available at: <https://sway.cloud.microsoft/f26YrHEcEHYLCN4>

- Scottish Government should influence DWP to work with specialist domestic abuse charities to embed a trauma-informed approach across the child maintenance system to help all staff to better support victim-survivors of domestic abuse.
- Scottish Government should work with DWP to introduce planned legislative reform that takes into account unearned income, self-employment and real-time earnings to better assess the non-resident parent's income and ensure children receive the maintenance they are entitled to.

### Economic abuse

Economic abuse involves the exploitation, sabotage, and restriction of women's economic and financial resources (i.e. money, income, housing, transport, employment, education). These tactics deplete women of their economic resources and creates financial dependence on the perpetrator for survival. Financial insecurity, and a lack of economic independence, can trap women and children with an abusive partner for years impacting their safety, physical and mental health, and their ability to rebuild their lives after separating. Economic abuse contributes to the financial insecurity and poverty that women and children in Scotland experience. There is currently no working definition of economic abuse within policy, legislation or strategy in Scotland, other than, loosely, within the Domestic Abuse (Scotland) Act 2018. Outside of specialist domestic abuse services, there is very limited advice and information available on economic abuse, coerced debt, and financial barriers for women who have experienced domestic abuse.

Our calls:

- The next delivery plan must reflect the realities of economic abuse and its impacts on women and children's poverty.

### Coerced debt

Coerced debt is debt that a domestic abuse victim-survivor has been forced, coerced or threatened into, or that has been taken out fraudulently without her knowledge or consent, by her partner. The debt can be held privately (i.e. banking products such as loans, mortgages, etc.) or publicly (i.e. council tax debt or rent arrears). Coerced public debt plays a huge role in worsening women and children's economic security. It can trap them with abusive partners or force them to return and therefore go on to experience abuse for longer. Perpetrators often deliberately accrue public debt as a form of economic abuse.

Our calls:

- Scottish Government should promote awareness and understanding of economic abuse and coerced debt within local councils, housing associations and utility companies.
- Local authorities must disregard rent or council tax arrears when providing emergency accommodation to victim-survivors and their children and ensure that no public debt prevents victim-survivors from accessing emergency accommodation. Local authorities and utility companies must prohibit aggressive debt collection practices that push families deeper into poverty.
- Local authorities must develop debt recovery policies that recognise the impact of domestic and economic abuse and prevent victims being pursued for coerced debt in their name because of abuse.
- Local authorities and utility companies must suspend debt collection by public bodies for victim-survivors for 12-24 months to allow time to emotionally and financially recover without facing additional pressures and financial hardship.

For more detail on coerced public debt, please see Scottish Women Aid's joint briefing with Aberlour and Financially Included.<sup>55</sup> For more detail on the financial implications of leaving an abusive partner, please see Scottish Women's Aid's recent response to the Social Justice and Social Security Committee Inquiry.<sup>56</sup>

**Q5: What more can we do to understand the challenges being faced by the family at greatest risk of poverty, including the six priority families identified to ensure their specific and interconnected needs are met?**

The child poverty delivery plan's focus on family groups at greatest risk of poverty, including lone parents, families with a disabled adult or child, young mothers, minority ethnic families, families with a child under one, and larger families, is designed to enable the targeting of resources. However, for this to be genuinely impactful, an intersectional analysis is required. While there will be variations in these family groups around needs and priorities, it is important to recognise that each priority family is not a homogenous group. Women's experiences of inequality are not universal, but rather shaped by the intersecting inequalities they face. For example, while there are commonalities experienced by all women at work, disabled

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<sup>55</sup> Scottish Women's Aid, Aberlour and Financially Included (2024) *Joint briefing on coerced debt*, available at: [https://womensaid.scot/wp-content/uploads/2024/11/Coerced-Debt-Joint-Briefing\\_Nov2024.pdf](https://womensaid.scot/wp-content/uploads/2024/11/Coerced-Debt-Joint-Briefing_Nov2024.pdf)

<sup>56</sup> Scottish Women's Aid (2025) *Submission to the Social Justice and Social Security Committee inquiry on financial considerations for leaving an abusive relationship*, available at: <https://womensaid.scot/wp-content/uploads/2025/03/SWA-SJSS-Consultation-Response-February-2025.pdf>

women<sup>57</sup>, racially minoritised women<sup>58</sup>, lesbian, bisexual and trans women<sup>59</sup>, refugee women<sup>60</sup>, young women<sup>61</sup>, and older women<sup>62</sup> experience intersecting and compounding inequalities which erect barriers to participation in the labour market, and to progression within their occupation. An intersectional approach is therefore crucial to so that policy design and delivery takes account of the needs of marginalised women, who are most likely to be living in poverty. Although language around intersectionality is becoming more prominent, this is not reflected in policy development, with little meaningful focus on the needs of different groups of women.

The next child poverty delivery plan must be cognisant of the relevance of gender to all priority groups. For example:

- Nine in ten single parents are women, and there is a significant overlap with experiencing domestic abuse and being a single parent.
- Women are more likely to be disabled, and more likely to be carers for disabled children and adults.
- Disabled women experience higher levels of underemployment and unemployment, and in-work poverty.
- A high proportion of young mothers are also single parents, and domestic abuse is also a common experience.
- Women with large families (three or more children) often face prohibitively high childcare costs creating additional barriers to the labour market.
- Minority ethnic women experience higher levels of unemployment and low pay, and some groups of minority ethnic women experience particularly high levels of 'economic inactivity'.

This requires policymakers leading on the child poverty delivery plan and related policy work to be gender competent, and be able to analyse the impact of intersecting inequalities on women and children's experiences of poverty. For example, women are the vast majority of single parents. The Scottish Government's overview of the priority families identified that 92% of lone-parent families are headed by women and that 'successful interventions are generally those

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<sup>57</sup> Close the Gap (2018) *Response to the Scottish Government Consultation on Increasing the Employment of Disabled People in the Public Sector*

<sup>58</sup> Close the Gap (2019) *Still Not Visible: Black and Minority Ethnic Women's Experiences of Employment in Scotland*

<sup>59</sup> Stonewall (2014) *The Double-Glazed Glass Ceiling: Lesbians in the workplace* and House of Commons Women and Equalities Committee (December 2015) *Transgender equality*

<sup>60</sup> Scottish Refugee Council (2014) *One Step Closer*

<sup>61</sup> YWCA Scotland (2016) *Status of Young Women in Scotland*

<sup>62</sup> Scottish Commission on Older Women (2015) *Older Women and Work: Looking to the future*

geared positively towards gender equality.’<sup>63</sup> However, there continues to be a preponderance of gender-blind approaches when trying to understand the experiences of priority family groups. As a result, actions do not target the gendered inequalities underpinning the higher rates of poverty experienced for single-parent families including low-paid, part-time work, inflexible work, inaccessible and unaffordable childcare, inadequate support for unpaid carers, and domestic abuse.

The lone parent section in the current delivery plan does mention child maintenance, a critical issue for many single parents experiencing poverty. However, the next delivery plan must address the additional challenges with the child maintenance system that are faced by domestic abuse survivors. Perpetrators who are paying parents commonly utilise inconsistent child maintenance payments as a form of economic abuse against the resident parent. In these situations, child poverty can be caused by the deliberate withholding of funds by an abusive parent.

Data published by Scottish Government shows the intersections between priority groups.<sup>64</sup> For example, more than two-thirds (68%) of children within households with a young mother also belong to at least one other priority group; 24% belong to three priority groups; and 11% are represented in four priority groups. The data further shows that of children living in households with young mothers:

- Almost half (47%) are also in single parent households;
- A third (33%) have a baby in the household;
- Almost a third (30%) have a disabled adult or child in the household;
- More than one in ten (11%) are in larger families (3+ children); and
- 3% are in non-white households.

Domestic abuse is also an inequality which shapes many young mothers’ lives. Research by the Centre for Research on Families and Relationships found that for mothers who were both in the youngest age category and the poorest income category it is predicted that one in three experience some form of abuse. By contrast, one in ten mothers who were neither in the youngest nor poorest categories are predicted to experience abuse.<sup>65</sup>

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<sup>63</sup> Scottish Government (2024) *Tackling child poverty priority families overview*, available at: <https://www.gov.scot/publications/tackling-child-poverty-priority-families-overview/pages/lone-parent-families/>

<sup>64</sup> Scottish Government analysis of Family Resource Survey.

<sup>65</sup> Skafida, Dr Valeria, Dr Fiona Morrison and Professor John Devaney (2021) *Mothers living with domestic abuse in Scotland – a tale of poverty and social inequality*, Centre for Research on Families and Relationships, Research briefing 94, March 2021

The delivery plan must also address challenges faced by women with no recourse to public funds (NRPF), including in situations of domestic abuse. It is worrying that the previous delivery plans do not contain significant detail on the specific barriers faced by women with NRPF or plans to support them.

Our organisations welcome current work by Scottish Government analysts to review the evidence on gender and poverty, and evaluate the extent to which key policy frameworks have taken account of this critical link.

Our calls:

- Integrate learning from the evidence review on gender and poverty to centre intersectional gender equality in the new delivery plan, with targeted interventions to support women who are most marginalised and their children such as disabled women, victim-survivors of domestic abuse, young mothers and women with NRPF.

**Q6: What targeted action could be taken to tackle inequalities faced by marginalised groups, to help raise their incomes and improve their outcomes? This could include specialist support for one or more groups.**

Our response has set out in previous answers the evidence base for an approach which targets action at the most marginalised women and their children including young mothers, single parents, victim-survivors of domestic abuse, disabled women, migrant women, and racially minoritised women.

We would suggest that the next child poverty delivery plan creates a targeted strand on addressing women's poverty and financial inequality to set out specific actions that improve women's incomes through paid work and recognition of unpaid care through social security support. This explicit section of the plan focusing on gender should be accompanied by gender-competent actions being embedded across the four strategic themes and in targeted action focused on the priority group families.

This would present an opportunity to take a 'twin-track' approach to mainstreaming an intersectional gendered approach in the next delivery plan. It requires having specific, focused goals for gender equality that are then further supported by embedding gender across all other policy areas. The twin-track approach is recognised internationally as a necessary and effective component of

mainstreaming.<sup>66</sup> It is also supported by NACWG which has made similar calls for a twin-track approach to Scottish Government's mainstreaming work while also calling for a national gender equality strategy to be developed.<sup>67</sup>

**Q7: Please use this text box to enter anything else you feel is relevant that we may have missed, this may include any research, evaluation or findings from consultations that you have undertaken which are relevant to this call for evidence. You can attach any published reports, research on lived experience of poverty, or internal pieces of work you may hold along with your submission.**

There continues to be a severe lack of gender-sensitive data collection on levels of poverty and child poverty that can accurately determine levels of poverty for different groups of women in Scotland. The equality analysis that was most recently undertaken from the limited data collected on poverty by the Scottish Government is fundamentally flawed because: 'Poverty is measured at a household level. Everyone in the same household is considered either in poverty or not in poverty. This makes it difficult to measure the poverty risk by individual characteristics such as age or gender for people who share the households with others.'<sup>68</sup>

There needs to be focused action to improve the range of intersectional data available on poverty levels for women within households. This is particularly important for the child poverty action plan to understand the gendered dynamics of intra-household resource allocation, including families within the priority groups.

We know that women are much more likely to share households with others, whether as unpaid carers, partners who are lower earners, or those who are mainly responsible for childcare and other reproductive labour within a household. The analysis undertaken by the Scottish Government only focuses on including single adult households (with or without dependent children). This leads to a flawed conclusion determining that it is childless male-headed households experiencing the highest poverty rates. It obscures the experiences of women within households experiencing poverty, in which they have less access to financial resources and are often primary managers of household budgets and shock absorbers of poverty to ensure their children or other dependents are fed, clothed and cared for.

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<sup>66</sup> UN Women (2020) *UN Strategic Planning and Gender Equality and the Empowerment of Women: Guidance*, available at:

<https://www.unwomen.org/sites/default/files/Headquarters/Attachments/Sections/How%20We%20Work/UNSystemCoordination/UN-SWAP/UN-SWAP-2-Guidance-on-UN-strategic-planning-and-gender-equality-and-empowerment-of-women-en.pdf>

<sup>67</sup> First Minister's National Advisory Council on Women and Girls (2024) *Phase Two Report 2024*, available at:

<https://www.generationequal.scot/second-focus-of-scrutiny/>

<sup>68</sup> <https://data.gov.scot/poverty/>

We also continue to see a lack of explicit acknowledgement that the priority family group of single-parent households with children is made up of an overwhelming majority of female-headed households, even though the data collected from the Scottish Government on poverty states: 'estimates for single fathers are not available due to small sample sizes.' The chronic lack of evidence collected on women's experiences of poverty means that efforts to measure the impact of the child poverty action plan will be constrained by data gaps.

NACWG has highlighted the need for investment in improved intersectional data gathering and analysis. It also highlights the need for gender policy coherence, and adequate prioritisation and resource allocation to achieve this. Our organisations therefore support the following NACWG calls to enable this to be realised:

- Scottish Government should publish a measurement framework to track progress on women's equality in Scotland which should be underpinned by an action plan to address intersectional data gaps and make better use of qualitative data from organisations in the women's sector and wider civil society.
- A national intersectional gender equality strategy should be produced which captures existing work on women's and girls' equality, and includes new targeted policy and programmes to address the gaps.
- Anti-poverty strategies and plans, including the child poverty delivery plan, should prioritise the needs of marginalised women and girls in order to meet the 2030 targets.
- Scottish Government, COSLA and local authorities should work together to progress the commitment to ending care charges for disabled women and to halt approaches to recover social care debt.
- Integrate gender budget analysis into the Scottish budget setting process and put it on a statutory footing.
- As part of the review of the public sector equality duty, require public bodies to gather and use intersectional data, and integrate intersectional gender budget analysis into their budget setting procedures.