

**COUNCIL OF EUROPE COMMISSIONER FOR HUMAN RIGHTS -
MEMORANDUM ON CHILD POVERTY IN THE UK: RESPONSE FROM UK
GOVERNMENT**

INTRODUCTION

Growing up in poverty has damaging consequences for children's health, education and future employment as well as for the UK's future economic prosperity. The UK has higher child poverty rates than most comparable European Union and Organisation for Economic Co-operation and Development (OECD) countries. Nearly a third (31%) of children are in relative low income (after housing costs) in the UK.

Shortly after the 2024 General Election, the Prime Minister set up the Ministerial Child Poverty Taskforce to bring together ministers and external experts to develop an ambitious Child Poverty Strategy, considering all available policy levers to reduce child poverty. Government alone cannot achieve this goal. This change requires consensus, partnership and shared action. In developing the strategy, the government put the voices of children and families experiencing poverty at the heart of its work, undertaking meaningful and structured engagement with children and their families, actively listening to their voices and building our strategy around their insights and experiences.

The UK-wide Child Poverty Strategy, published on 5 December 2025 will lift 550,000 children out of relative low income (after housing costs) in 2029/30 – and will see the largest reduction in a single UK Parliament since comparable records began. The removal of the two-child limit in Universal Credit from April 2026 will reinstate support for all children and will alone lift 450,000 children out of poverty in the last year of this Parliament. Alongside this, work is also underway to fundamentally fix the structural drivers of child poverty so that families can access affordable better-quality housing and parents can be supported to move into secure and rewarding employment.

The UK Government welcomes the recognition in the Commissioner's Memorandum of the important progress it is making on child poverty and its commitment to delivering lasting change for children and families experiencing living in poverty. The UK Government recognises, however, that fundamentally fixing the structural drivers of child poverty will take time and it has been clear from the start this will be a long-term, 10-year strategy. Through the Monitoring and Evaluation Framework published alongside the Strategy, the UK Government is putting in place robust arrangements for ensuring it builds on the progress made and holds itself to account on delivering the impact it has promised throughout this Parliament and beyond. Further details on the Monitoring and Evaluation approach will be set out in the baseline report publication due in Summer 2026.

The Child Poverty Strategy is UK-wide and tackling child poverty requires action across reserved, devolved and local levers. The Scottish Government, Welsh Government and the Northern Ireland Executive have their own distinct powers to tackle child poverty as set out in their devolution settlements. These powers vary across nations, with some policy levers being devolved to the devolved governments, while others remain reserved to the UK Government.

The Devolved Governments are proactive in their individual responsibilities for poverty reduction and the Child Poverty Strategy, is intended to build on and complement work underway across all nations of the UK. The UK Government is committed to continued collaboration with the devolved governments throughout the delivery and implementation phase.

CONCLUSIONS AND RECOMMENDATIONS

Child Poverty Strategy Implementation

- ***Give full political priority and ensure allocation of all necessary resources to the implementation of the Child Poverty Strategy.***

The UK Government's Child Poverty Strategy brings together the substantial action it has taken to increase incomes (including the removal of the two child limit in Universal Credit) and employment, reduce essential costs and strengthen local services to address child poverty in the short term and to set the groundwork to tackle its key drivers.

The UK Government will continue to work across Government and with stakeholders and partners to ensure it delivers on its commitment to long-term lasting change, and it has put in place the structures to ensure that this Strategy delivers and that it can build upon its success. The Monitoring and Evaluation Framework published alongside the Strategy sets out how Government will hold itself to account on delivering the impact it has promised through this Parliament and beyond as part of its ongoing commitment to transparency, accountability, and continued learning.

A crucial part of this approach will be the continued emphasis on including and hearing directly from children and families with experience of poverty to ensure a wide range of voices are considered when evaluating the Strategy's successes and areas for development. Further details on the approach will follow in a baseline report in Summer 2026, which will also set out the latest statistics and evidence, with annual reporting thereafter to monitor and evaluate progress.

- ***Ensure that the Strategy's implementation, as well as any further measures, adopt a distinctly human rights based approach, including***

through mandatory child rights impact assessments and requiring dedicated attention to the impact on children from particularly affected groups.

The UK Government is committed to safeguarding and advancing children's rights and firmly upholds the principles of the UN Convention on the Rights of the Child as part of the policy-making process.

From the outset, development of the Child Poverty Strategy has been guided by a children's rights approach. This has included actively engaging with children and young people, as well as organisations that represent them, to ensure their voices and lived experiences shaped policy development. This also included gathering direct insights from children from vulnerable and less well heard groups, with particular risk of poverty.

Building on the work undertaken throughout the strategy's development to engage directly with children, the government will consider publishing a Children's Rights Impact Assessment (CRIA) which concludes that the Child Poverty Strategy is expected to have an overall positive impact on children's rights, particularly in relation to Articles 6 (right to life, survival and development), 26 (social security) and 27 (adequate standard of living). This would be published alongside a child-friendly version of the strategy. This version is designed to speak directly to children and explain what the Government is doing to help improve their lives.

We are committed to continuing this approach as the strategy is implemented, by involving children in monitoring its impact, ensuring their experiences and feedback shape how this work develops over time with an emphasis on understanding the experiences of children and families from different groups and across different local areas.

Beyond the implementation of the Child Poverty Strategy, the UK Government will also continue to carry out Child's Rights Impact Assessments to assess the impact on children of decisions that affect them. This assessment is a valuable tool in ensuring children's rights are considered and the UK government has worked with civil society experts to develop a robust template to capture the relevant information.

- ***Further elaborate clear and measurable child poverty reduction targets and timelines and consider embedding these in legislation.***

The Child Poverty Strategy sets out commitments that will result in 550,000 children being lifted out of relative low income after housing costs in 2029/30. Due to the Strategy, there will be 7.1 million children, including 1.4 million children in deep material poverty, living in households whose incomes will increase.

The Child Poverty Strategy highlighted that this is the beginning of the process and, alongside the main publication, outlined a Monitoring and Evaluation Framework to track progress, and ensure transparency, accountability and continued learning.

This includes tracking progress against two complementary headline metrics: relative low income (after housing costs) and deep material poverty. Relative low income is an internationally recognised measure of poverty which reflects changing living standards over time. Deep material poverty is a new measure based on material deprivation, which reflects the UK Government's commitment to addressing deeper child poverty based on what families report they can afford.

Further details on the UK Government's approach to monitoring and evaluation will follow in a baseline report in Summer 2026, which will also set out the latest statistics and evidence, with annual reporting thereafter to monitor and evaluate progress.

These arrangements will be in addition to the existing statutory duty on the UK to publish poverty statistics annually, and together, these arrangements will ensure that the UK Government holds itself to account for the progress it makes in delivering the Strategy.

International and Domestic Legal Obligations

Strengthen international and domestic legal frameworks for combating child poverty by:

- ***Ratifying the Revised European Social Charter and accepting collective complaints.***

The UK Government remains committed to advancing social rights and continues to support the European Social Charter as part of its engagement with the Council of Europe. The UK Government values the Charter as an important framework for promoting social protection, equality, and wellbeing, and it remains actively engaged with Council of Europe institutions on these matters.

The UK Government is preparing to participate in the High-Level Conference on the Charter in Chişinău, Moldova, in March 2026. In addition, it has recently received the European Committee of Social Rights' report on the UK's Non-Accepted Provisions of the European Social Charter and will review its findings.

- ***Lifting reservations to the ICESCR and ratifying the Optional Protocols to the ICESCR and CRC.***
- ***Taking further steps to incorporate these instruments in domestic law.***

Ratifying the Optional Protocol to ICESCR:

The UK Government has considered its position on accepting the right to individual petition to the UN under ICESCR. It concluded that the benefits of the communication procedure remain too unclear, especially for the applicant.

In particular, the UN process is not an appeal mechanism, it cannot reverse decisions of the domestic courts, and it cannot result in an enforceable award of compensation for the applicant.

The UK Government notes the Committee's previous observation that it needs to give effect to its obligations and provide legal remedy. The UK Government is confident that it is fully compliant with its UN treaty obligations, including ensuring effective remedies where required for any breaches.

Ratifying the Optional Protocol to the UNCRC:

The UK Government is fully committed to children's rights and the continued implementation of the UNCRC, to make the Convention a reality for all children and young people living in the UK. Since ratification of the UNCRC in 1991, implementation of the Convention in the UK has been pursued through legislation and policy initiatives and there are no plans currently to ratify the third optional protocol to the UNCRC (relating to a communications procedure). The UK Government believes effective domestic laws already exist where individuals can challenge any government decision and seek enforceable remedies in the domestic courts if their rights have been breached, and this includes breaches of children's rights under the UNCRC.

- ***Promptly enacting the public sector duty on socio-economic inequalities in the Equality Act 2010.***

The UK Government is committed to ensuring that everyone, no matter their background, can thrive, recognising that socio-economic disadvantage is tied to worse outcomes across education, health, housing and crime rates, and can lead to higher rates of isolation and loneliness. One of the UK Government's core missions is to break down barriers to opportunity for all. It views the socio-economic duty as a valuable tool to ensure a proactive approach to putting socio-economic disadvantage at the heart of its decision making. In particular, it will require specified public authorities to consider how strategic decisions that they make might help to reduce inequalities associated with socio-economic disadvantage.

This duty has never been commenced in England despite the socio-economic duty on public bodies being in force since 2010. Scotland brought the duty into force in April 2018 as the 'Fairer Scotland Duty', and in March 2021, Wales brought it into

force under its 'A More Equal Wales policy agenda. In addition, a number of public authorities in England have voluntarily adopted the duty, either in full or in part.

The UK Government has heard that those bodies that have implemented the duty say that it has enhanced their efforts to address socio-economic disadvantage, and intends to learn from this experience as it takes action to commence the duty in England. Work is therefore underway to make sure that commencement of the duty in England is as effective as possible, driving efforts across the country to break down barriers to opportunity and making sure there is no class ceiling on people's ambitions.

Social Security Issues

Build on the abolition of the two-child limit by addressing further issues in the social security system negatively impacting on child poverty, including by:

- ***Removing the benefit cap and ensuring that the level of social security payments is sufficient in each case to ensure an adequate standard of living.***

Benefit cap

There is clear evidence that, wherever possible, it is in the best interest of children to be in working households. Children living in households where no adults work are around 4 times more likely to be in poverty than those in households where all adults are in work. The benefit cap is therefore in place to incentivise work and encourage personal responsibility while maintaining a strong safety net for those who need it. Households can receive benefits up to the value of gross earnings of around £25,700 nationally or £30,300 in London. For single households, these numbers are £15,600 or £18,700 in London).

It is important to note that people who are earning at least £846 each month are exempt from the benefit cap, and the UK Government is delivering a step-change in employment and skills support for parents so that they can better balance work and caring responsibilities through high quality, flexible jobs, and improving access to childcare so parents are better able to work.

There is also protection for the most vulnerable as those who are caring or are severely disabled are exempt from the benefit cap. This means that where a member of a household is in receipt of a disability benefit, for example Personal Independence Payment, Adult Disability Payment, Disability Living Allowance for children or Child Disability Payment they are exempt. Furthermore, households where a member undertakes caring activity and qualifies for Carer's Allowance,

Carer Support Payment or receives the carer element of Universal Credit, are also exempt.

The Secretary of State for Work and Pensions has a statutory obligation to review the benefit cap levels at least once every five years. The Secretary of State will determine the appropriate time to do so in line with this statutory duty. As the levels were last reviewed in November 2022, a further review is not required until November 2027.

Benefit adequacy

The UK Government recognises that Universal Credit has a critical role to play in tackling poverty and making work pay and it has already taken a number of steps to strengthen the support it provides for those in need. The introduction of the Fair Repayment Rate for deductions from Universal Credit from April 2025 allows 1.2 million of the poorest households to retain more of their award, on average £420 a year or £35 per month.

From April 2026, the Universal Credit Act 2025 will deliver the first sustained above inflation rise in the basic rate of Universal Credit since it was introduced. Just under four million households will benefit overall from the UK Government's decision to increase the Universal Credit standard allowance, estimated to be worth around £760 annually in cash terms for a single parent aged 25 or over (£250 above inflation) or £1195 (£400 above inflation) for a couple where one is aged 25 or over with children by 2029/30.

These changes are in addition to the Secretary of State's annual review of State Pension and benefit rates, as required by law. Following this review, the majority of working-age benefits and other benefits for people below State Pension age will be up-rated by 3.8% from April 2026, in line with the increase in Consumer Price Index (CPI) in the year to September 2025.

- ***Adopting a distinctly human rights based approach to the review of health or disability related benefits, and ensuring that this is used as an opportunity to reduce poverty amongst children with disabilities or in families with persons with disability.***

For many people, work is an important source of purpose and relationships in their lives. It also significantly reduces their risk of poverty and is the best way to raise living standards. There is clear evidence that good work is good for physical and mental health and the negative impact on health of being out of work can be significant. The UK Government's Pathways to Work Green Paper, published in March 2025, was therefore built on the principle that government should support

those who can work to do so, while protecting those who can't and that disabled people should have the equal choices and chances to work that they are entitled to.

The changes being made to Universal Credit from April 2026 are designed to fix a system which currently encourages people to claim health benefits and incentivises inactivity. The changes will be targeted in a way that protects those with the most serious, long-term conditions and provides work, health and skills support to everyone affected by changes to the Limited Capability for Work Related Activity condition. This aligns with our core principles of reform – that those who can work should work, if people need help into work, the UK Government should support them, and those who can't work should live with dignity.

The Green Paper also sets out the Pathways to Work support offer, which will ensure a coherent and navigable offer of support, building on and bringing together a range of initiatives such as Connect to Work, WorkWell and local Trailblazers. The UK Government believes that it is right that the Personal Independence Payment is now fully reviewed to ensure it is fair and fit for the future. It has therefore launched the Timms Review, the first ever full review of Personal Independence Payment since it was introduced in 2013, to ensure the system supports disabled people to achieve better health, higher living standards and greater independence, including through employment.

The Review is being co-produced with disabled people, the organisations that represent them, and other experts. This means the UK Government will share ownership and responsibility for how the Review runs and what it recommends. The Review is co-chaired by the Minister for Social Security and Disability, Sir Stephen Timms, alongside Sharon Brennan and Dr Clenton Farquharson CBE. They are leading a steering group of a dozen people, responsible for overseeing co-production of the Review, setting its strategic direction, priorities and workplan.

To ensure lived experience is at the heart of its work, almost all of the steering group has lived experience of a disability or long-term health conditions. The Timms Review will report to the Secretary of State for Work and Pensions by autumn 2026, with an interim update expected ahead of that.

- ***Carrying out a comprehensive review of the impact of the No Recourse to Public Funds policy on children's rights, and taking prompt measures to ensure that, while in place, it does not result in children being in poverty.***

The UK Government believes that the No Recourse to Public Funds (NRPF) restrictions are an important part of immigration policy designed to assure the public

that controlled immigration brings real benefits to the UK and does not place excessive demands upon the UK's finite resources.

The UK Government recognises the distinct challenges of poverty faced by families subject to the NRPF condition and, in developing the Child Poverty Strategy, the Ministerial Taskforce engaged extensively with families, charities and leading organisations across the UK, including those making representations on behalf of children subject to NRPF. This engagement will continue as the UK Government implements its plans for delivering and evaluating the Strategy.

There are important safeguards that currently exist within the system to ensure that vulnerable migrants and children are protected. For example, section 17 of the Children Act 1989 imposes a general duty on English local authorities to safeguard and promote the welfare of "children in need" in their area. Any support provided to a child by local authorities under such legislation is not dependent on the immigration status of the child or their parent(s). Local Authorities can also provide support if there is a human rights issue, or there is a genuine care need that does not arise solely from destitution.

Migrant children subject to the NRPF condition have access to a range of support in England to support disadvantaged children. In England, this includes access to Free School meals (subject to certain eligibility thresholds), funding for schools to support disadvantaged children, 15 hours per week early years childcare entitlement for disadvantaged 2-year-olds in England, 15 hours early years child care entitlement for 3- to 4-year-olds in England, support for children with special educational needs and disabilities; and local authority grants.

Migrant families who have entered the UK under the Family or Private Life routes, Appendix Child Relative (Sponsors with Protection) or the Hong Kong British National (Overseas) routes, can apply to have their NRPF condition lifted by making a 'Change of Conditions' application under specific circumstances. The NRPF condition may also be lifted for other migrant families but only in specific circumstances, for example, where someone is destitute or at risk of imminent destitution, there are reasons relating to the welfare of a relevant child, or where they are facing exceptional circumstances affecting their income or expenditure.

Furthermore, the UK Government is continuing to develop its understanding on NRPF and its impacts. The Home Office is working with the Department for Work and Pensions to develop questions on NRPF for inclusion in the Family Resources survey 2026/2027, a household survey undertaken annually to explore living standards in the UK. This will provide greater insight into how families with the NRPF conditions are living in the UK and will help to inform future policy-making.

- ***Improving the accessibility of the social security system and reconsidering potentially unreasonable sanctions currently in place.***

Reviewing Universal Credit

Universal Credit is claimed by over 8 million people in Great Britain and therefore plays a hugely important role in supporting low-income families. Fifteen years on from its introduction, it is right that the UK Government reviews the support it provides to ensure it meets this Government's priorities for tackling poverty and incentivising work as well as meeting the needs of families who engage with the system. Reviewing Universal Credit is not about wholesale changes to the benefit, it's about understanding Universal Credit as a whole and making changes, like the Fair Repayment Rate for deductions, that improve the way Universal Credit works for our customers. The Minister for Social Security and Disability, Sir Stephen Timms, is leading this work which has involved engaging with a wide range of organisations and people, including those with first-hand experience of claiming Universal Credit, those who support them and those with expertise in the system and how it works.

Digitalisation

Digitalisation has modernised the welfare system and improved efficiency, but the Department for Work and Pensions recognises that this can unintentionally create barriers for some groups with limited digital access or confidence, including families. Feedback from claimants, colleagues and internal analysis shows that many households need structured digital skills support and one-to-one support to access or maintain their Universal Credit account.

Although Universal Credit is primarily a digital service, the Department for Work and Pensions provides a full range of alternative channels including through telephony, face-to-face contact during jobcentre appointments, home visits and assisted digital help. Wider support is available through external services such as Help to Claim which is offered through Citizen's Advice while many customers receive support from a trusted third-party including family members or support workers.

The Department continues to prioritise ensuring that all customers can engage fully with the system, regardless of their digital skills by maintaining non-digital routes, strengthening personalised and face-to-face support, and raising awareness of available help. Ongoing improvements to digital platforms are guided by user research, operational insight and external audits to ensure all claimants can engage fully with the service.

Supporting Parents into Work

Supporting parents into good work will always be the foundation of the approach the UK Government is taking to tackle poverty and, through the proposals in its Get

Britain Working Strategy, it is driving forward the biggest reforms to employment support in a generation to help more people into work and to get on in work.

While Universal Credit is designed to incentivise and support work wherever possible, the UK Government recognises parents can face many barriers to work including access to high quality, affordable, and accessible childcare, which can affect their decisions to take up paid work or to increase their working hours.

Since September 2025, eligible working parents of children from 9 months old living in England have been able to access 30 hours of Government-funded childcare. Working parents on Universal Credit can receive 85% of childcare costs and 100% of any upfront costs, alongside the Department for Education's offer of free childcare for those eligible. As part of the Child Poverty Strategy, it went further and announced that childcare support through Universal Credit would be extended to help with the childcare costs for all children, rather than being capped at two. The process for accessing upfront childcare support will also be streamlined to make it easier for eligible parents to navigate the system and be confident about the support they will receive. It is also improving the guidance available to work coaches and claimants on claiming upfront costs to ensure the policy works as intended.

Universal Credit Sanctions

The UK Government believes it is right that, in return for financial support through Universal Credit, most claimants should take part in work related activities set out in legislation. These activities, such as attending appointments or taking steps to prepare for work, or to increase their hours of employment, are intended to build confidence and to offer practical employment support. Universal Credit is designed to help people move towards work at a pace that reflects their individual circumstances, so Department for Work and Pensions work coaches set requirements in discussion with the claimant, taking account of any caring responsibilities, health conditions, and existing work. Expectations are recorded in the Claimant Commitment and are set to be fair, achievable, and supportive, with mandatory actions clearly explained so that the claimant is clear about what they are expected to do and the consequences of not complying.

A sanction – a reduction in the amount of Universal Credit paid – will only apply where a claimant fails to meet a mandatory requirement without a good reason for doing so. Before being referred for a sanction, claimants are asked for their reason and a pre-sanction referral check is also undertaken to ensure that the failed requirement was appropriate for the claimant and their circumstances. Decision makers will also consider the claimant's circumstances, the appropriateness of the requirement set, and any evidence of good reason before deciding to apply a sanction. Claimants who disagree with a sanctioning decision can request a Mandatory Reconsideration to have the decision reviewed and also have the right of

appeal to an independent tribunal if they disagree with the outcome of the Mandatory Reconsideration.