

Memorandum on child poverty in the United Kingdom

Introduction

1. The Commissioner for Human Rights, Michael O'Flaherty (hereinafter: the Commissioner), carried out a visit to the United Kingdom from 30 June to 4 July 2025.
2. The Commissioner fosters the effective observance of human rights, assists member states in the implementation of Council of Europe human rights instruments, identifies possible shortcomings in the law and practice concerning human rights and provides advice and information regarding the protection of human rights across the region.¹
3. While the visit focused on several issues, this memorandum pertains specifically to child poverty.² The memorandum is published later than would normally be the Commissioner's practice, as several key developments regarding child poverty occurred in the period following the visit. These include the removal of the two-child limit on the receipt of certain benefits and the publication of the UK government's child poverty strategy. In view of their significance, these are reflected in this memorandum to complement the findings from the visit itself. The observations presented are not exhaustive and should be considered in conjunction with recommendations by other Council of Europe and international bodies, as well as guidance provided by national human rights structures.
4. During his visit, the Commissioner discussed the issue of child poverty with the Minister of State (Minister for Women and Equalities) at the Department of Education, Baroness Smith of Malvern; the Minister for Transformation at the Department of Work and Pensions, Andrew Western MP; the Second Permanent Secretary at the Home Office, Simon Ridley; the Chair of the Parliament's Joint Committee on Human Rights, Lord Alton of Liverpool, and Baroness Lawrence, member of the Committee; members of the United Kingdom's delegation to the Parliamentary Assembly of the Council of Europe including its then-Chair, Lord Touhig; and the Chair of the Equality and Human Rights Commission, Baroness Falkner of Margravine, and other members of the Commission's Board. He also held extensive discussions with civil society. The Commissioner further visited several sites in the East London borough of Newham, including the Newham Community Centre, the Magpie Project, and the XLP Youth Hub, where he heard from children, young people, families and those supporting them for the alleviation of child poverty. The Commissioner also had exchanges with Youth Ambassadors from the End Child Poverty Coalition. Following the visit, the Commissioner received further submissions, and held additional online exchanges with the Scottish Cabinet Secretary for Social Justice, Shirley-Anne Somerville MSP, the Scottish Minister for Equalities, Kaukab Stewart MSP, and the Chair of the Scottish Human Rights Commission, Angela O'Hagan.³
5. The Commissioner thanks the authorities of the United Kingdom in Strasbourg and London for their assistance in organising this visit. He is grateful to the children, families and those supporting them, civil society and other interlocutors who agreed to share their insights.
6. Section I will set out the context of the visit. Section II summarises the key issues discussed during the visit. Section III engages with the above-mentioned subsequent developments impacting on the approach to combating child poverty. This is followed by the Commissioner's recommendations.
7. The Commissioner looks forward to continuing his dialogue with the authorities of the United Kingdom on the issues addressed in this memorandum.

¹ [Resolution \(99\)50](#) on the Council of Europe Commissioner for Human Rights, adopted by the Committee of Ministers on 7 May 1999.

² See the [end-of-visit statement](#) of 8 July 2025 for an overview of all issues addressed during the visit. As other follow up to the visit, the Commissioner published a [letter](#) of 23 September 2025 to the Secretary of State for the Home Department on protests, and a [letter](#) of 3 October 2025 to the Chairs of the Joint Committee on Human Rights and the Women and Equalities Committee on the situation of trans people.

³ Further meetings not pertaining to child poverty are listed in the Commissioner's [end-of-visit statement](#).

I. Context

8. The Commissioner decided to make child poverty a focus of his visit in view of the magnitude of this issue in the UK. Over 4.5 million children – approximately 31% of the child population – reportedly live in relative poverty.⁴ Despite policy efforts, there has been a persistent trend of child poverty worsening.⁵ This has involved both a widening and a deepening of child poverty, as evidenced, for example, by the rise in the number of children unable to meet basic needs such as food, clothing and shelter.⁶
9. Several groups of children are disproportionately affected by poverty and are therefore in need of specific attention and government action. This includes children in larger families, with significantly more children in families of three or more living in poverty than those in single-child households. Children in single-parent families are also much more likely to be in poverty than those in households with two parents. Children with disabilities or in a household with a person with disabilities are also highly vulnerable to poverty. Additionally, strong ethnic disparities persist, with nearly half of children from Black, Asian, and minority ethnic backgrounds experiencing poverty. Children from other minority groups, such as Roma and Traveller communities are also particularly vulnerable to poverty.
10. The Commissioner recognises and welcomes that the UK government has explicitly acknowledged the importance and urgency of combating child poverty, including by committing to reducing child poverty during this Parliament. In this regard, the Commissioner's observations below specifically aim to assist the UK government in meeting this commitment.

II. Child poverty and the UK's international human rights obligations

11. Poverty impacts across the entire spectrum of children's social, economic, political, cultural and civil rights, as enshrined in the numerous instruments that the UK is party to, and which set out obligations to protect children and their families from poverty and its effects. These include notably the European Social Charter of 1961, the International Covenant on Economic, Social and Political Rights (ICESCR), and the Convention on the Rights of the Child (CRC). These instruments, and the recommendations of the bodies supervising them, safeguard the rights of families and children to protection,⁷ the progressive realisation of the right of children to an adequate standard of living, and their protection with respect to a range of intersecting rights such as social security, health, education and housing. They also point to the need for a comprehensive, multi-faceted approach to combating poverty, with the participation of all key stakeholders, including children and their families.
12. The above human rights framework provides the authorities with a clear roadmap to delivery of its commitment to combat child poverty. Following this roadmap elevates the issue from political or moral imperatives to the fulfilment of international obligations. It also ensures that considerations of budgetary and fiscal constraints, while an inevitable part of decision making, do not unduly interfere with the enjoyment by children of their rights.⁸
13. To fully benefit from this roadmap, the UK should consider strengthening and updating its international human rights commitments. The UK has not accepted numerous provisions under the

⁴ See, for example, Child Poverty Action Group (CPAG), [CPAG's response to the latest poverty statistics](#), 27 March 2025, drawing from the UK government's data set on households below average income 2023/24.

⁵ On virtually all measures, child poverty in the UK in 2025 has further worsened since the same issue was raised by the Commissioner's predecessor three years prior. See [report](#) CommDH(2022)27, 18 November 2022.

⁶ Research from the Joseph Rowntree Foundation (JRF), suggests that a growing number of children live in households unable to afford at least one of the following three: enough food, heating their home, or keeping up with household bills. See: JRF, [Three policies to reduce child poverty this parliament](#), 24 May 2025. The Resolution Foundation has projected that, if no further action is taken, child poverty would further increase to some 4.8 million children by the end of 2029-2030, amounting to 34 percent of all children. See: Resolution Foundation, [No half measures: setting child poverty on a downward course at the Autumn Budget](#), 30 October 2025.

⁷ In this regard, see the European Committee on Social Rights, Conclusions XXII-4(2023), March 2023, p. 31, finding the UK's situation not in conformity with Article 17 (right of mothers and children to social and economic protection), in view, among others, of the rate of children at risk of poverty.

⁸ On the mobilisation of resources and the adoption of a human rights focused fiscal policy, see the UN Committee on Economic, Social and Cultural Rights (CESCR), concluding observations on the seventh periodic report of the United Kingdom of Great Britain and Northern Ireland, E/C.12/GBR/CO/7, 12 March 2025, paragraphs 18-19.

European Social Charter of 1961,⁹ and it has not ratified the Charter's Additional Protocol establishing the possibility of the submission of collective complaints. The UK also remains one of the few Council of Europe member states not to have ratified the Revised European Social Charter of 1996, which constitutes a powerful tool to enhance member states' action to protect social rights, including in the area of child poverty.

14. The Commissioner understands that the government's approach to ratification of the Revised Charter is to ensure compliance with any new obligations before taking this step. While the Commissioner appreciates this position, he notes that ratification of the Revised Charter could also be an important catalyst to make the necessary changes to national frameworks and practices. Similarly, while noting that the government considers that current supervisory mechanisms (reporting as part of the Charter process) are sufficient, enabling collective complaints may provide a very constructive and useful way to identify and address possible gaps in the national system. The same applies to the ratification of the Optional Protocols enabling individual communications under the CRC and the ICESCR. In relation to the latter, the UK also still maintains several reservations.¹⁰
15. International instruments on social rights and children's rights are also not, or only partially, incorporated in domestic law.¹¹ The Commissioner specifically notes as a good practice the adoption of the UNCRC (Incorporation) (Scotland) Act 2024 in Scotland, as well as the intention of the Scottish Government to incorporate further UN treaties including the ICESCR. He encourages the UK government and other devolved administrations (within their competences) to draw on this example.
16. Strengthening national-level protections on social rights would also positively impact on combating child poverty. The Commissioner welcomes the UK government's commitment to enact the public sector duty regarding socio-economic inequalities under Section 1 of the Equality Act 2010. It requires specified public bodies, when making strategic decisions such as priorities and setting objectives, to consider how these help reduce the inequalities associated with socio-economic disadvantage. The Commissioner encourages the government to take this process forward promptly.

III. Summary of issues discussed during the visit

17. The visit took place amidst several active political and public debates on child poverty, including on key policy steps contemplated by the UK government. Importantly, a Child Poverty Strategy was still in development at the time of the visit. During discussions, numerous issues of relevance for the Strategy and wider policy were raised, while at all times recognising that these discussions could not be comprehensive.

a. The role and impact of the social security system

18. Discussions with children, families and civil society organisations working with them, including during the field visits, significantly focused on the social security system, as a key bulwark against poverty. This bulwark has come under pressure over the last decade and a half.¹²
19. In this context, the two-child limit on the receipt of certain social security payments was by far the most discussed and highlighted issue during the visit. The UK's **two-child limit** policy was recognised by the Commissioner as an outlier in Europe and beyond, and it has been consistently identified by international bodies as contributing to breaches of children's rights. There is also evidence that the two-child limit has been unsuccessful in meeting the aims originally pursued by

⁹ Articles 2(1), 4(3), 7(1), 7(4), 7(7), 7(8), 8(2), 8(3), 8(4), 12(2), 12(3), 12(4) and 18(2).

¹⁰ CESCR, concluding observations 2025, footnote 7 above, paragraph 9, calling for withdrawal of reservations.

¹¹ CESCR, concluding observations 2025, footnote 7 above, paragraphs 6-7; UN Committee on the Rights of the Child (CRC), concluding observations on the combined sixth and seventh periodic reports of the United Kingdom of Great Britain and Northern Ireland, CRC/C/GBR/CO/6-7, 22 June 2023, paragraph 8(a).

¹² CESCR, concluding observations 2025, footnote 8 above, paragraph 40: "benefit cuts and temporary reductions in or the suspension of benefits, have eroded the rights to social security and to an adequate living, disproportionately affecting persons with disabilities, low-income families and workers in precarious employment. The Committee expresses concern that those reforms have resulted in severe economic hardship, increased reliance on foodbanks, homelessness, negative impacts on mental health and the stigmatisation of benefit claimants."

this policy.¹³ The Commissioner heard how, in many cases, households receiving Universal Credit consisting of three or more children received support that was likely to be (far) less than the actual costs of bringing up and caring for their children.

20. The overall **amount of social security payments** was also frequently raised as an impediment to preventing child poverty and lifting children out of poverty, especially in view of the rising cost of living.¹⁴ Concerns related to the need to ensure that Universal Credit payments would keep pace with inflation and accurately reflect the cost of living in different parts of the UK. They also specifically related to the **benefit cap**, which limits the total amount of social security payments that families can receive and affects Universal Credit, as well as a number of other allowances and benefits, including the Child Benefit, Employment and Support Allowance, Housing Benefit, Maternity Allowance and others that may particularly impact on children's situations.
21. Many interlocutors commented on the **complexity of understanding and navigating the social security system** in the UK, which provides a barrier to preventing and combating poverty amongst children. The far-reaching digitalisation of the system also presented families with problems, including in the face of the growing digital divide in the country. Concerns were raised about the rigid nature of the system, and the perceived **punitive nature** of measures associated with it. Organisations working with, or representing, families with children social security recipients provided examples of payments immediately being stopped due to the missing of a single appointment. Including in view of experiences in other member states, the Commissioner also notes that artificial intelligence-driven decision making on social security has sometimes increased these risks, which should be taken into account in any further steps in this regard.¹⁵
22. Another frequent point of discussion during the visit was the link between efforts to get people into work and measures to limit access to social security. While appreciating the government's prioritisation of getting people into work, discussions also indicated that a significant proportion of children living in poverty are in families where one or both parents already work. Wage stagnation and an increase in insecure employment mean that many working families struggle to make ends meet. As such, there may be limits to the extent to which an approach on employment as opposed to social security can address this issue.
23. Social security for households with **persons with disabilities** was also a key concern. Some 44% of children in poverty reportedly live in families with at least one person with disabilities. Changes to social security for people with disabilities, particularly affecting Personal Independence Payments, led to widespread concern, and public protests were happening at the time of the visit. The changes also elicited concern from international bodies.¹⁶
24. Another area of concern was the '**No Recourse to Public Funds**' (NRPF) policy attached to some migration statuses, excluding families from most social security measures, including Universal Credit, child benefits, housing support or large parts of childcare support. There are important indications that the policy puts families with children at even more risk of poverty.¹⁷ The

¹³ R. Patrick, A. Reeves and K. Stewart, [The two-child limit: a policy that fails, even on its own terms](#), University of Glasgow/LSE, October 2025. The study, drawing on research as part of the Benefit Changes and Larger Families project, found that the two-child limit neither substantively affected fertility rates among lower-income households nor supported transitions into employment, while it produced higher child poverty rates.

¹⁴ Also see the European Committee of Social Rights' conclusions, footnote 7 above, p. 20-22, finding that the level of family benefits in the UK more generally was not in conformity with Article 16 of the 1961 Charter.

¹⁵ Many of these issues were already raised in detail in the [Report](#) of the UN Special Rapporteur on extreme poverty and human rights, Philip Alston, on his visit to the United Kingdom of Great Britain and Northern Ireland, A/HRC/41/39/Add.1, 24 April 2019. Also see: Amnesty International UK, [Social Insecurity: the devastating human rights impact of social security system failures in the UK](#), EUR 45/9283/2025, April 2025

¹⁶ Guardian, '[UN panel raises concerns with UK government over welfare bill](#)', 8 July 2025. Also see a further [letter](#) to the UK government from the UN Special Rapporteurs on the rights of persons with disabilities and on extreme poverty and human rights, OL GBR 12/2025, 4 September 2025, expressing "fear that this process may have put fiscal considerations before the duties of the United Kingdom of Great Britain and Northern Ireland under the international human rights instruments it has ratified..."

¹⁷ For example, the Joseph Rowntree Foundation found that 8 in 10 low-income families with children subject to a NRPF condition were going without essentials, while many were cutting back or skipping meals and almost half

Commissioner exchanged with families with young children housed in hotels unsuitable for longer-term stays with children. They reported a lack of cooking facilities, inability to play, no refrigeration for milk or medicine, resorting to fast food or being provided with poor quality and culturally inappropriate food packages. The Commissioner was informed that the use of such temporary accommodation was in some cases continued far beyond legal limits.

b. Specific manifestations of poverty and areas of action

25. In relation to specific manifestations of poverty, **food insecurity** was reported to be an increasingly prominent issue for families on low incomes. The Commissioner visited a community-run food bank, where he was able to exchange on the challenges with both clients and those organising food distribution. The **strong reliance on civil society initiatives**, and the need for much stronger support for community-based initiatives, were particularly noticed by the Commissioner.¹⁸
26. For the children and young people speaking with the Commissioner, issues around school life were a key focus. While access to **free school meals** was appreciated, they warned of the stigmatising effect such programmes can have when they are not universal, if this allows a clear distinction to be made between those who do and do not receive free school meals. Similarly, other costs, such as **school uniforms**, were frequently raised, with examples provided of children being stigmatised for wearing second-hand uniforms or uniforms several sizes too large (to last for several years).
27. **Early childhood support** was highlighted as a key factor in preventing the inter-generational transmission of poverty. The type of support historically provided by the (now often defunct) Sure Start centres was held up as a particularly good practice. Recent research has shown the positive impact of Sure Start,¹⁹ and there was widespread agreement that similar support should be reinstated.
28. While the visit did not include detailed discussion of **housing policy**, issues of the affordability of housing and its burden on the spending of household income were raised. Inadequate housing conditions, such as those addressed in paragraph 24, were also identified for other groups of children in poverty, showing the need for a wider reconsideration of housing policy and the prevention of homelessness, including as regards the use of temporary accommodation.

c. Overall approach to combating child poverty

29. Families, civil society groups and experts uniformly agreed that combating child poverty should take account of **regional disparities**,²⁰ and policies should be flexible enough to give authorities at all levels the ability to take targeted measures best suited to tackling this in their specific local or regional contexts. The situation of children living in **rural or remote places**, including on islands, was highlighted as requiring attention, including in view of the distance to core services and the costs of reaching them.²¹
30. The interplay with action by **devolved administrations** was also particularly emphasised in this context. While the visit, and therefore this memorandum, focuses primarily on measures by the UK government, and does not include a detailed assessment of action at devolved levels, the Commissioner acknowledges and welcomes simultaneous efforts by devolved administrations, including the Northern Ireland executive's draft Anti-Poverty Strategy (which has passed its consultation stage), the Scottish Government's Tackling Child Poverty Delivery Plan 2022-2026 (of which a new iteration is being prepared), and the Child Poverty Strategy for Wales.

going hungry. They also spent a significant part of their income on housing, see M. Johnson-Hunter, [Families with no recourse to public funds are trapped in hardship](#), Joseph Rowntree Foundation, 8 August 2025.

¹⁸ See [end-of-visit statement](#) of 8 July 2025.

¹⁹ P. Carneiro et al, [The short- and medium-term effects of Sure Start on children's outcomes](#), Institute for Fiscal Studies, May 2025.

²⁰ See, for example, North East Child Poverty Commission, [Fact and figures](#), no date.

²¹ See, for example, Scottish Human Rights Commission, [Economic, Social and Cultural Rights in the Highlands and Islands](#), November 2024.

d. Discussions with the authorities on measures taken

31. Exchanges with representatives of the UK government were open and constructive, acknowledging the need for action in many of the areas identified above. Assurances were given that the upcoming Child Poverty Strategy would take a comprehensive approach, with measures cutting across the various concerns expressed. They noted that the issue of the two-child limit was under consideration. Government representatives further highlighted that several decisions had already been made that acted as a “down payment” on the Strategy. These measures included the **expansion of the free school meals** to all those in families receiving Universal Credit in England, starting from September 2026. Similarly, they noted the expansion of **free breakfast clubs**, as well as measures to **reduce school-related costs**, including a cap on branded items, especially school uniforms. Also highlighted was the introduction of a new **Crisis and Resilience Fund** in April 2026, to support local authorities in addressing the challenges faced by families in poverty. The expansion of **Family Hubs**, while catering for a broader range of families than the Sure Start centres, was presented as a significant measure to re-build early childhood support. In his end-of-visit statement, the Commissioner welcomed efforts to start addressing child poverty whilst a Strategy was finalised.

IV. Key developments since the visit

a. The Universal Credit Act and further steps on disabilities

32. In the months following the visit, several key developments occurred which are of particular significance to combating child poverty, in view of the issues raised in section II. First, the Commissioner welcomes that certain proposed changes to the social security system for people with disabilities, especially as regards **Personal Independence Payments (PIP)**, have been halted pending a review by the Minister for Social Security and Disability (the Timms review). He appreciates that the government has committed to ensuring that the Review is co-produced with disabled people and organisations representing them, as well as other stakeholders. He also notes the importance of the commitment to ensuring that PIP is “fair and fit for the future, rather than to generate proposals for further savings”.²² However, it is crucial that the review is used as an opportunity to advance both the fight against child poverty and the full protection of the rights of people with disabilities.
33. Despite the changes to Personal Independence Payments being put on hold, the Commissioner notes with concern that some of the changes adopted under the Universal Credit Act may still have adverse effects on child poverty levels. This includes the significantly **reduced amount of health-related payments** under Universal Credit for new claimants from April 2026, as well as the freezing of rates, preventing them from rising with inflation. Furthermore, he notes that concerns have been raised about whether the criteria in the Act sufficiently protect those with the most severe and life-long conditions from cuts. According to the government’s own projections, some 730,000 people with disabilities are affected by the changes introduced,²³ and their impacts must be closely monitored and adverse effects promptly addressed.
34. The Commissioner welcomes that the Universal Credit Act introduces an **increase in the standard allowance under Universal Credit** above inflation, until 2029-2030. It is important that the authorities are vigilant to ensure that this is not undermined by other features of the social security system, including the benefit cap and issues of accessibility highlighted in section II.

b. The abolition of the two-child limit

35. The Commissioner welcomes the decision, as announced in the Autumn Budget of 26 November 2025, to **abolish the two-child limit** on the receipt of certain social security payments, as of April 2026. To this effect, on 8 January, the UK government laid the Universal Credit (Removal of the Two Child Limit) Bill before Parliament. In view of the comments in section II, the impact of this step cannot be overstated. Without this step, it would be difficult to imagine an effective overall approach to combating child poverty. It is an important investment in the rights and well-being of children

²² Department for Work and Pensions, [Timms Review of Personal Independent Payment: Terms of Reference](#), policy paper, 30 October 2025.

²³ Department for Work and Pensions, [Spring Statement 2025 health and disability benefit reforms – Impacts](#), p. 4.

across the UK. The government's projections suggest that the abolition of the two-child limit could help lift as many as 450,000 children out of poverty, while others would see their depth of poverty reduced. The measure may also allow devolved administrations to redeploy resources used to mitigate the impact of the two-child limit to further strengthen efforts to combat child poverty.

36. The Commissioner calls on lawmakers to **promptly adopt the Bill**, so that the removal of the two-child limit is not delayed. He notes that discussions about policy options around the two-child limit and social security reform more generally have often been heavily influenced by stigmatising preconceptions about people receiving social security benefits, which are unfortunately often promulgated in the media and political debates. Some of these have become particularly prominent following the decision to abolish the two-child limit. In this context, the Commissioner is particularly concerned about statements of some lawmakers calling into question the lifting of the two-child limit for ethnic minority or non-UK born children.

c. The Child Poverty Strategy

37. International human rights bodies have noted the lack of a comprehensive, UK-wide child poverty eradication strategy.²⁴ The publication, on 5 December 2025, of the strategy '**Our Children, Our Future: Tackling Child Poverty**', therefore fills an important gap. It contains both an analysis of the trends and drivers of child poverty in the UK, and an elaboration of an interconnected set of measures to address child poverty. Taken together, the Strategy projects that these measures will lift 550,000 children out of poverty across the UK by 2029, whilst around 7.1 million children would see their household incomes increased, including 1.4 million children in deep material poverty.
38. The Commissioner appreciates the broad-ranging nature of the Strategy, and the **involvement of many stakeholders**, particularly families with children experiencing poverty themselves, as well as civil society and the Children's Commissioners of England, Wales, Scotland and Northern Ireland. The Commissioner appreciates the foreseen support to civil society and local authorities, and the recognition of the need to work side by side with devolved administrations.
39. The Strategy contains numerous measures related to issues that were raised during the Commissioner's visit and set out above. While each of the measures proposed will need to be assessed on their merits in view of their specific implementation, the Commissioner believes that the overall Strategy represents an **extremely important step in tackling the long-standing crisis of child poverty**. The Commissioner welcomes the UK government's commitment and ambition and will closely follow its further implementation.
40. This implementation would be significantly strengthened by taking a **human rights based approach**. This is not explicitly set out in Strategy,²⁵ although it encompasses many elements that would overlap with such an approach. The Strategy sets out a commitment to strong monitoring and evaluation, although details of this need to be further established. In this respect, a human rights based approach could foresee, for example, mandatory **child rights impact assessments** of new policy measures, which are currently not in place in England, Wales and Northern Ireland.²⁶ It also implies close assessment of the impact of measures taken on disadvantaged groups.²⁷ Alongside the existing recognition of the role of Children's Commissioners, the deeper involvement of the National Human Rights Institutions of the UK, Scotland and Northern Ireland may in particular help all relevant authorities to adopt and strengthen a human rights based approach.
41. Importantly, human rights bodies have called for the establishment of **clear, measurable targets** for reducing child poverty.²⁸ In this context, the Commissioner notes that the new Child Poverty Strategy contains projections about its impact, but not specific targets. During his visit, several interlocutors noted that child poverty reduction targets in the past have been laid down in legislation, and this is still the case in Scotland.²⁹ The incorporation of clear and measurable targets in legislation would be

²⁴ For example, CECSR concluding observations 2025, footnote 8 above, paragraph 44.

²⁵ The Strategy addresses employment or workers' rights, but not general human rights obligations.

²⁶ CRC concluding observations, footnote 11 above, paragraph 8(e).

²⁷ CESCR, concluding observations, footnote 8 above, paragraph 19(b).

²⁸ CESCR, concluding observations, footnote 7 above, paragraph 45(a).

²⁹ Child Poverty (Scotland) Act 2017.

an effective way to further embed the Strategy across all levels of government, to ensure long-term consistency in their pursuit, and to enhance Parliamentary and public scrutiny.

42. The Commissioner recognises that the UK government considers the Strategy as a starting point and not the end point of its efforts to combat child poverty. In view of such further efforts, he presents the following conclusions and recommendations.

Conclusions and recommendations

The Commissioner welcomes that important progress has been made on multiple issues highlighted in his end-of-visit statement of 8 July 2025. The UK government's approach, including as laid down in the new Child Poverty Strategy, has the potential to provide a sea change in addressing the long-standing crisis of child poverty in the United Kingdom. To capitalise on this momentum, the Commissioner recommends to the UK government, and where relevant devolved administrations, to:

- Give full political priority and ensure allocation of all necessary resources to the implementation of the Child Poverty Strategy.
- 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.
- Further elaborate clear and measurable child poverty reduction targets and timelines, and consider embedding these in legislation.
- Strengthen international and domestic legal frameworks for combating child poverty by:
 - Ratifying the Revised European Social Charter and accepting collective complaints.
 - 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.
 - Promptly enacting the public sector duty on socio-economic inequalities in the Equality Act 2010.
- 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.
 - 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 disabilities.
 - 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.
 - Improving the accessibility of the social security system and reconsidering potentially unreasonable sanctions currently in place.