



Women in Prison

A response to the
Consultation on decriminalising TV license evasion

1 April 2020

About Women in Prison

Founded in 1983, Women in Prison (WIP) aims to reduce the number of women in prison and prevent the harm caused to women and their families by imprisonment. Women in Prison's proposals are based on experience of delivering gender-specialist trauma informed support services in prison and the community for women affected by the criminal justice system.

For more information see www.womeninprison.org.uk

About Women in Prison (WIP):

Women in Prison (WIP) is a women-only organisation that provides holistic, gender-specialist and trauma-informed support to women affected by the criminal justice system. We work in prisons, in the community and “through the gate”, supporting women leaving prison. We run three women’s centres (in Manchester, Woking and Lambeth, London) which include support for diversion schemes for women at early stages of involvement in the criminal justice system, as well as support for women on community sentences and on release from prison. Our combined services provide women with support around advocacy, complex needs, domestic and sexual violence, physical health, mental health, substance misuse, parenting, training and employment.

We advocate for a significant reduction in the numbers of women being sent to prison and for strengthened community support services, particularly women’s centres.

Our policy and campaigns work is informed by our frontline support services for women, delivered at every stage of a woman’s journey through the criminal justice system. The experience and knowledge of staff working directly with women affected by the criminal justice system enable us to see first-hand how well policy is implemented in practice.

About this consultation response:

Our response to this consultation is concerned specifically with women involved in the criminal justice system.

1. Should TV licence evasion (the use or installation of a television receiver without a TV licence) no longer be a criminal offence? Why do you consider that TV licence evasion should no longer be a criminal offence?

We unequivocally believe that TV license non-payment should no longer be a criminal offence.

Criminalisation

The criminalisation of non-payment of TV license is a disproportionate response that inadvertently affects the most at risk and poorest in our society; it is therefore a de facto criminalisation of poverty and multiple disadvantage, not a fair or appropriate response to failure to pay. We prefer not to use the term TV license evasion as this risks carrying implications that all non-payment of TV license is a conscious choice of dishonesty or malicious intent. In reality it is often the result of poverty and the inability to pay due to strict budgeting and inability to meet basic needs, including of dependants. The supposed need to punish those who have not paid their TV license is not a fair reflection of the situation facing those who are unable to pay. TV license fees are high and for individuals and families facing financial hardship they are a significant cost. A criminal conviction in itself, even if low-level, has serious consequences, including for women's future employment prospects, particularly as women are disproportionately employed in health, social care and education sectors which often require enhanced Disclosure and Barring Service (DBS) checks.

Custody

The government's [consultation document](#) states that *'imprisonment is a 'last resort' option for the court where all other methods of enforcement have been unsuccessful. Even then, imprisonment where there has been a default in the payment of a fine will only occur following a formal inquiry into the offender's ability to pay'*. However, the fact that any women at all are imprisoned as a result of non-payment of TV license is a travesty. Although the number of women sentenced to prison for non-payment of fines associated with using a TV without a licence have decreased significantly, this still applies to a number of women every year. In the last ten years, a total of 219 women have been sentenced to custody for this offence.¹ Short custodial sentencing has detrimental effects on women with ramifications far beyond the sentence itself. Just a short period in prison can lead to loss of home, employment, benefits and future employability chances. It also has harmful effects on mothers and their children that can last a life-time. Many women are carers; custody therefore impacts severely also on women's dependants. For example, when a mother is sent to prison, in 9 out of 10 cases her children will need to leave their homes to go into care or live with relatives.² The adverse effects of short custodial sentences are well documented, including in the Government's own Female Offender Strategy³ which advocates for a reduction in the use of custody, in particular in short sentencing for women, in favour of community support services such as those provided by women's centres. The statement that *'if a person wilfully refuses to pay the fine despite repeated warnings, they may be imprisoned for non-payment of that fine'* needs serious re-consideration: it is misleading to speak of women as 'wilfully refusing' to pay as this fails to take into account a whole range of reasons and explanations for non-payment, explored throughout this document.

Fines

In the vast majority of cases of TV license prosecution, women receive a fine. Almost all men and women found guilty of non-payment of TV license (over 99%) receive a fine and in 2017, the average fine was £174 for females and £177 for males⁴. As discussed in question 5, women as a group already face economic disadvantage and hardship across all areas, and women affected by non-payment of TV licenses often face particular economic vulnerabilities. £174 (or more) is therefore a significant fine with severe consequences for women already in poverty.

Fines are based on weekly income; for anyone on low income or benefits the fine for TV licence evasion would be £40 if there was a guilty plea and no aggravating factors. However, when the weekly income is not known to the court an average figure is used instead. This is problematic given that because of the Single Justice Procedure, many individuals convicted of the offence may not even be aware that they are being prosecuted, and may not hear the outcome. Moreover, The Single Justice Procedure uses an average income, which discriminates against women who are on average paid less than men. In general terms, we have to take a step back and reflect on whether issuing a fine really is the most appropriate response to any situations arising from poverty and financial hardship or whether this in fact is a counter-intuitive and contradictory measure that exacerbates the underlying root causes of non-payment. The sad reality is that many women who receive a fine will take out high-interest loans (e.g. pay day loans) in order to pay their fines, and in doing so often spiral further into debt.

The Single Justice Procedure

The Single Justice Procedure allows individuals to plead online or by post, never appearing in court. Instead, an individual is simply sent a notice of prosecution to which they are expected to respond by post or online. The case is then decided by a single Magistrate. As the consultation document states, the majority of TV license cases are dealt by way of the Single Justice Procedure; in fact, over 96% of TV licence cases are processed using the Single Justice Procedure. A full 80% of defendants do not enter any plea⁵, meaning the prosecutors proceed with the case without hearing a defence. This is clearly a problematic situation, and one which lacks transparency and agency on the part of defendants. It is particularly problematic as there is no way for the magistrate to know whether the defendant has actually received the notice in the first place. As outlined in question 5, many women facing multiple disadvantages have insecure, temporary and/or shared accommodation. The risk of notices going missing or not reaching the intended recipient is therefore high. Moreover, multiple difficulties such as low levels of literacy, mental ill health and/or learning difficulties risk notices not being fully read or understood.

In their response to this consultation, [APPEAL](#) speaks of several women who have found themselves in this situation and describe how some individuals do not find out that they have a conviction until there has been an attachment order made on their benefits or wages, when it comes up on an enhanced check for new employment, or when they have a visit from bailiffs. This is an unacceptable consequence of the Single Justice Procedure, and one which is contrary to justice and fairness. Any efficiency of this system cannot be at the expense of such potential miscarriages of justice.

2. If, alternatively, you consider that TV licence evasion should remain a criminal offence, why is this the case?

n/a – see above.

3. If you have a view, what alternative enforcement scheme models do you consider to be most appropriate? Why?

We believe the current system should be replaced with an alternative, non-criminal enforcement scheme. It is understandable that the Government is concerned with the cost and difficulty of implementing an alternative scheme. However, there is good practice and alternative approaches from which to draw across other sectors in regards to civil debt enforcement schemes. It is important, however, that the government takes care not to replicate the issues with the current

models. This includes some of the potential unintended consequences of a civil enforcement scheme discussed in the consultation document e.g. potentially higher fines, court fees, impact on credit rating and the use of bailiffs.

Civil enforcement: courts, fines and imprisonment

Under the current system, each individual is proceeded against at the magistrates' court.⁶ As noted in the consultation document, a move from the criminal justice to the civil justice system does not mean a move away from courts, but will shift the responsibility from criminal to civil enforcement. This ensures defendants are not getting a criminal record, which is a key improvement. Under a civil system, debt would be recoverable through a claim in County Court instead of Magistrates Court. This system allows for greater flexibility for financial circumstances and earlier intervention for support.

However, we believe the government should still make every effort to avoid involving the courts, and only do so when deemed absolutely necessary. Attending court presents a number of practical barriers, including taking time off work and/or arranging child care. In addition to this, court hearings are often delayed and/or postponed which presents additional difficulties, particularly for women in insecure employment and women whose employers are not flexible with taking time off.

It is important to note that decriminalisation and replacing the criminal sanction with an alternative civil enforcement scheme does not in itself solve the issue of imprisonment. A comparison can be made with non-payment of council tax which is a civil offence. Despite being a civil offence, a number of women have still received unlawful prison sentences for non-payment of council tax. Crucially, women are still prosecuted for non-payment of fines, regardless of whether the payment itself is a criminal or civil offence, and non-payment of fines can result in imprisonment⁷. In order to ensure a fair and proportionate new model, the new system must not involve the imposition of a fine for non-payment, but should instead focus on setting up a repayment plan for any money owed for the license, and setting up a new payment plan for any future license payments.

A fairer system: Examples of best practise in enforcement procedures

In order to ensure a fairer and more proportionate system going forward, it is important that any decriminalisation is coupled with a reform of enforcement procedures, including increased regulation of how debt is collected, clarity about the role of enforcement officers and independent monitoring of bailiffs as well as clear procedures in regards to escalation to counter court. It also requires flexibility to individual circumstances and varying abilities to pay.

We support proposals made by charities in the debt and finance sector such as [Christians Against Poverty](#) and the [Money Advice Trust](#) who advocate for a shift to a civil debt system. We believe that in devising an alternative model the government should look to areas such as electricity, water and consumer credit. We feel that the government is in a strong position to take inspiration from best practice examples in other sectors, while being able to avoid replicating existing problems in the current criminal enforcement model as well as other civil debt enforcement models. For more detail on this proposed system, please see the submission to this consultation from Christians Against Poverty.

A civil enforcement regime could be flexible and allow for individual circumstances and ability to pay, including payments spread out over a longer period of time, and rates set at different tiers. TV Licensing could ensure rates are tailored to individuals' financial situations and ability to pay, and that any individual who has been found to be watching TV without a license is set up with a realistic

repayment plan. Where an individual provides evidence of financial difficulties and is unable to meet repayments, TV Licensing should consider suspending, reducing, waiving or cancelling any further charges for a TV licence. We appreciate that the BBC's funding model relies on payment from individual license payments. However, on the whole, members of the public are able to pay for their licence in full whereas the small number of individuals affected by such financial hardship will not reasonably have a detrimental effect on the future of the BBC. The impact of prosecution on these individuals, on the other hand, is significant. The issue of imprisonment for non-payment has also had a detrimental impact on the reputation of the TV license model and is widely seen as harmful and disproportionate.

Regulation and independent monitoring

Any collection of debt should be subject to clear regulation and guidelines. Examples of best practise include standards set by the Financial Conduct Authority in its FCA Handbook⁸ and the Water Services Regulation Authority Guidelines,⁹ which discuss principles of proportionality, the use of certain powers only as a last resort, debt advice and flexible payment plans.

The current enforcement system is rather ad hoc, with variation in practice between individual enforcement officers and not enough restriction of powers of bailiffs. We believe the involvement of bailiffs should be avoided whenever possible and we support calls made by debt organisations for greater regulation of bailiffs, clearer complaints procedures and a restructuring of bailiffs' fees to encourage early and less aggressive resolution of debt problems.¹⁰ When devising a new model of enforcement, all of the above needs to be taken into account by TV Licensing.

4. What steps could the Government take to mitigate any impacts that may result from decriminalisation of TV licence evasion?

Decriminalisation of non-payment of TV license does not necessarily need to lead to lower levels of license fee payments. TV Licensing is currently in a unique position compared to other household services within the civil enforcement sphere and a new model would simply bring it in line with other services. The Government and TV Licensing should consider shifting their focus away from a punitive and threatening scheme to one which is more focused on early intervention and support. In order to avoid reaching the stage of sentencing, it is important to consider a more flexible approach with TV license exemptions and payments tailored to individual circumstances. The key aim of decriminalisation needs to be to prevent and avoid prosecution, thereby shifting the focus of this consultation away from how to best prosecute and enforce.

A more encouraging approach to TV license payment

In general terms, and as also touched on by the Perry review¹¹, TV Licensing could change the tone and content of their communications to make themselves more easily understood. They could also ensure their communications and messaging are more supportive and less threatening. Incentives should be offered for individuals to admit if they are unable to pay in order to set up any relevant exemptions, deferred payment options and realistic payment plans. Currently, there is a risk that individuals fear making themselves known and engaging voluntarily, thinking this may put them at risk of prosecution. The lead-up to visits by enforcement officers could be more focused on financial support, advice and guidance at an early stage. Although it is impossible at this stage to predict the exact outcome of such an approach, it is reasonable to assume it would have an overall positive impact on license fee collection. Regardless of sentencing outcomes, the enforcement process itself is a stressful and difficult one for individuals, especially when taking into account that it often affects

those who are already facing multiple disadvantages and heightened mental health needs associated with poverty, such as stress, anxiety and fear. In addition to this, being subjected to a visit from bailiffs is an extremely distressing situation, especially for women who are already facing multiple needs and who may have experienced previous trauma and abuse, which is the case for the majority of women in the criminal justice system.

A chance for early intervention

Non-payment of TV license could provide an opportunity to reach adults at risk and offer support around budgeting, money management, benefits, debt, financial abuse and other related issues, with the potential of preventing future harm and further slippage into the criminal justice system. Enforcement officers should be trained to identify individuals with financial support needs and know how to signpost and make referrals to appropriate national helplines and support services. Ideally, local support schemes should also be mapped by area. These should include, but not be restricted to, support services for fuel poverty, food poverty, debt management, benefit support and budgeting but also broader mental health, housing support and holistic support services. Where a local area has a women's centre, all women who come to the attention of enforcement officers should be given information and contact details of their local women's centre. We would be happy to work with TV Licensing to facilitate the set-up of such information sharing and signposting.

5. Please provide any evidence you consider appropriate in answering these questions and any other information that you believe the Government should consider, especially where there an impact on those with protected characteristics or the most vulnerable.

As already acknowledged by the Government and the Perry review, women are disproportionately affected by TV license prosecutions. In 2017, 72% of defendants prosecuted for TV license evasion were female. In 2017, TV license evasion accounted for 30% of all female prosecutions, making it the most common offence for which females were prosecuted. This is compared to 4% of male prosecutions.¹²

Women and disproportionality of prosecutions

As is outlined in BBC's Gender Disparity Report¹³ following the Perry Review, there are some practical explanations relating to visits by enforcement officers which explain why women disproportionately come to the attention of TV Licensing. There is a disparity in the number of households being headed by women, with women accounting for 60% of heads of households. Women are also more likely to be at home due to caring responsibilities and other economic inactivity. In addition to these structural factors, women are also simply more likely to answer the door, and to engage with the caller, especially when the nature of the visit is authoritative. Given that non-payment of TV license is a 'Strict Liability Offence' this means that the person the officer engages with first is deemed to be the person carrying out the offence on behalf of the household.

The Gender Disparity Report discusses the above but concludes that unequal outcomes are driven by factors which are outside TV Licensing's control. It does, however, also state that the BBC is committed to '*minimising the risk that the way in which we exercise our duties negatively impacts gender disparity*'¹⁴. The appropriate response to having knowledge of such disparity, including existing structural disadvantages, is to take into account this disproportionality and actively build into it mitigation to ensure fairness for women and those facing additional barriers (many of whom will be women). Failure to do so risks TV Licensing being in breach of the Public Sector Duty of Equality under the Equality Act 2010¹⁵ on the grounds of gender discrimination. It is important that a new system monitors for, and mitigates against, any continued gender disproportionality. Clearly, some practical steps could be taken to avoid further disadvantaging women. For example, in cases

where there is a second adult, who is the main earner, living in the property, consideration could be made to whether this is the appropriate person to speak to about TV license payments, instead of relying on the principles of Strict Liability Offences.

Women and poverty

It is important to note that decriminalisation and replacing the criminal sanction with an alternative civil enforcement scheme does not in itself address the root causes of poverty. For context, and in order to stress the importance of gender-informed policies and procedures, we would like to set out some of the specific barriers facing women in poverty, which we feel the Government should take into account when looking into and devising an alternative model as any fines from prosecutions for non-payment of TV license end up having significant impact on women who are already struggling financially. We recommend the work of the [Women's Budget Group](#) (WBG) for more background on women's economic disadvantage.

As a group, women are disproportionately affected by a range of factors contributing to poverty: In-work poverty disproportionately affects women as most low-paid professions are dominated by women (with health and social care being the most common sectors of employment for women, followed by retail). Women disproportionately work part-time (around 40% of women in employment work part-time¹⁶) and, in addition, part-time workers tend to earn less per hour than those working full-time. Women also disproportionately have zero-hours and insecure contracts (around 55% of those in zero-hours contracts are women¹⁷). This has long-term effects on old age poverty, both in regards to pension expectations and difficulty accruing savings. As women on average also live longer than men, old age poverty further affects women. While a lower proportion of women compared to men are unemployed (i.e. looking for and available to work), a higher proportion of women compared to men are economically inactive (i.e. not looking for or available for work). Around a third of these women are economically inactive because they are looking after family or home.¹⁸

Further, as around 90% of single-parent households are headed by women¹⁹, women's poverty also has a profound effect on children. Nearly half of children in single parent families live in relative poverty. So when women's incomes do not cover basic living costs (whether they are in low-paid work or reliant on benefits), this means they also struggle to provide for their children. All of this means that women are more reliant on the benefits system and hence more vulnerable to benefits not covering the costs of living as well as any issues with benefits such as sanctions, problems with the transition to Universal Credit or the 5-6 week waiting time associated with new Universal Credit claims. These life factors make women more likely to accrue debt, and make it more difficult for them to pay off debts. Women are also disproportionately affected by certain types of debt. Black, Asiana and Minority Ethnic (BAME) women are particularly susceptible to poverty and affected by austerity.²⁰

Given women's propensity to old age poverty, we also need to take into account the anticipated disproportionate effects on older women once the new over-75s rules come into place.

Women and the criminal justice system

Women affected by the criminal justice system often face financial hardship such as poverty, debt, unemployment and benefits sanctions. As a group they also face other overlapping barriers including insecure housing or homelessness, ill physical and mental health and domestic abuse (including financial abuse). TV Licensing communications are not always received by women due to their often chaotic living situations such as staying in hostels or other forms of temporary accommodation. In other cases, they are not read or fully understood due to low levels of literacy and/or language

barriers. TV Licensing should think of different methods of communicating with individuals in order to ensure their message is received and fully understood.

TV Licensing needs to be more flexible in its approach to license requirements, and take into account different types of accommodation. Many individuals who face multiple barriers have living situations which do not fit into the norm. We are pleased that the unique set-up of refuge accommodation is already acknowledged by TV Licensing and that residents living in refuges are not charged on an individual basis but as a household. We would like to see this model extended to include other forms of shared accommodation such as short-term and temporary accommodation for adults at risk and adults with additional support needs. This includes all homeless hostels and supported housing schemes run by charities. In such models of housing, residents tend to have their own room but there will also be communal areas where there is likely to be a TV. We appreciate there already are concessions in place for sheltered/supported accommodation. However, this currently covers only residents who are elderly and/or disabled while we would urge that the scope of this should be extended to include a wider range of supported accommodation types for adults with multiple needs.

Given the often short-term nature of stays in hostels and supported accommodation, it is not logical for residents to pay for an annual TV license. This point can also apply even where women have more permanent accommodation such as private rental accommodation or a council property. Because the multiple barriers facing women in the criminal justice system, many women will not have housing, nor access to a TV, for an entire year but may periodically find themselves of No Fixed Abode (whether street homeless, sofa surfing, in prison or other forms of homelessness or insecure housing). We appreciate that when you move houses you can take your TV license with you. However, this assumes that you will still be needing a TV license for a year, and that you will keep the details of your license. It would therefore be advisable to offer those individuals who face particular barriers more flexible and shorter-term ways to pay. We welcome the introduction of the Simple Payment Plan which offers certain eligible individuals flexible fortnightly or monthly payment options, hence significantly easing their financial burden. We encourage the Government to extend this option to all license fee payers, particularly as a means tested process is likely to needlessly exclude certain individuals who are not in a position to advocate for themselves.

Case study: Jane

Jane** was 21 years old, a newly wed of a year, living in Brighton with her husband and two children. Jane didn't work as she was looking after her young daughter and her 5-year-old step daughter and therefore relied on her husband's income as a construction worker. Jane says: "My husband was paid each Friday in cash and brought his wage packet home and put it on the table. This sound great in principle but the reality was that every weekend he would spend roughly half of this wage packet in the nearest pub. It was his money and he could do what he wanted with it. I did not work at this time so the only income we had coming in was what was left of my husband's wages." Jane repeatedly put it to her husband that as the breadwinner of the house he needed to buy a TV Licence. He would simply reply that they didn't need one or that he would buy one soon.

One day an enforcement officer called in the daytime when Jane's husband was at work so Jane opened the door. Jane says: "I was asked if I had a TV licence, to which I replied 'no'. They did not ask me if I was the income holder of the house, they just asked for my name and told me to get a TV licence asap as this may help my case when it came to court." Jane was given a fine and had to pay straight to the court out of what little money she had every week.

Unfortunately, this experience did not result in ensuring that a TV Licence was bought every year. Two years later Jane was fined again, even though the original fine was not yet paid off and the debt was mounting. Jane

says: “I was then taken to court for non-payment of fines and fortunately I had a very understanding and compassionate magistrate. The magistrate listened to me when I explained that I was guilty of not paying the fine but that I personally didn’t believe that the fine should have been imposed on me in the first place as I was not the income holder for the household, just the unfortunate one who opened the door.” The magistrate quashed a significant part of the fine and Jane was left to pay only the court costs.

A couple of years later Jane’s marriage ended. Since going back to work she has been responsible for getting her own TV licence and always pays it via direct debit as she says this avoids the stress and risk of being criminalised for not getting one. Jane adds: “Although I was never imprisoned I do remember the fear and stress of that as a potential outcome, knowing that I had been fined and if I didn’t pay it that I could go to prison. I have ADHD and organisation is not my key strength, but I am organised about paying the TV licence.”

** Not her real name.

Further Information

This consultation response was prepared by Sofia Gullberg, Senior Policy Lead at Women in Prison.

For further information please contact sofia.gullberg@wipuk.org

Women in Prison Ltd.

2nd Floor, Elmfield House, 5 Stockwell Mews, London, SW9 9GX
t: 0207 359 6674

www.womeninprison.org.uk

@WIP_live

Charity number: 1118727 Company number: 5581944

¹ Parliamentary question 21 October 2019, Television: Licensing: Written question – 26808

<https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2020-03-09/26808>

² Lord Farmer (2019) *The Importance of Strengthening Female Offenders' Family and other Relationships to Prevent Reoffending and Reduce Intergenerational Crime*.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/809467/farmer-review-women.PDF

³ Ministry of Justice (2018) Female Offender Strategy

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719819/female-offender-strategy.pdf

⁴ Ministry of Justice (2018) Statistics on Women and the Criminal Justice System 2017:

A Ministry of Justice publication under Section 95 of the Criminal Justice Act 1991

⁵ Parliamentary question 21 October 2019, Television: Licensing: Written question - 2683

<https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2019-10-21/2683/>

⁶ Ministry of Justice (2018) Statistics on Women and the Criminal Justice System 2017:
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⁷ Social Market Foundation, *Unfair, ineffective and unjustifiable: the case for ending imprisonment for Council Tax arrears in England*, by Chris Daw QC (September 2019)

⁸ Financial Conduct Authority Handbook CONC 7.3 *Treatment of customers in default or arrears (including repossessions): lenders, owners and debt collectors*

⁹ Ofwater, *Dealing with household customers in debt –guidelines* (Revised 1 September 2015)
https://www.ofwat.gov.uk/wp-content/uploads/2015/10/gud_pro_custdebt200703272.pdf

¹⁰ Taking Control, *Taking Control, The need for fundamental bailiff reform* (March 2017)

¹¹ DCMS TV License Fee Enforcement Review, July 2015
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¹² Ministry of Justice (2018) Statistics on Women and the Criminal Justice System 2017:
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¹³ <https://www.tvlicensing.co.uk/about/gender-disparity-AB23>

¹⁴ BBC Gender Disparity Report TV Licensing, December 2017

¹⁵ <http://www.legislation.gov.uk/ukpga/2010/15/contents>

¹⁶ House of Commons library briefing paper: Women and the economy, March 2019

¹⁷ ibid

¹⁸ ibid

¹⁹ Gingerbread: <https://www.gingerbread.org.uk/what-we-do/media-centre/single-parents-facts-figures/>

²⁰ Women's Budget Group and The Runnymede Trust (2016) *New research shows poverty, ethnicity & gender magnify the impact of austerity on BME women*
<https://wbg.org.uk/media/new-research-shows-poverty-ethnicity-gender-magnify-impact-austerity-bme-women/>