

Engender submission to the Scottish Parliament Social Security Committee inquiry on Benefit Take-up

WOMEN AND SOCIAL SECURITY

Engender is a feminist policy and advocacy organisation working to realise women's economic, social and political rights and gender equality in Scotland. We have worked across welfare reform, and latterly Scottish social security, for nearly a decade, during which we have called for changes to ensure that women are no longer negatively affected by policies which ensure their access to resources is lesser than men's; keeps women and their children in poverty; puts their safety at risk and violates their rights over reproductive autonomy and privacy. Of particular concern to us in these regards are the single household Universal Credit (UC) payment, the family cap and 'rape clause' and the benefit cap and freeze.

House of Commons estimates suggest that over the decade of austerity, 86% of cuts to the tax and benefits system will come from women's resources.¹ While women are twice as likely to depend on social security for their income,² women already experiencing multiple social and economic disadvantages, including Black and minority ethnic (BME) women, older women, and women who are lone parents, are even worse affected,³ although the lack of national level data collection and analysis limits a full understanding of impacts.

While the creation of Social Security Scotland and the Social Security (Scotland) Act 2018 represent an opportunity to ameliorate some of the worst impacts of welfare reform for women, albeit limited by the scope of the devolution of powers, the ability of devolved benefits and systems to improve the circumstances of women will be dependent on the ability to reach groups who are worst impacted by changes to the tax and benefits system. In order to realise the Scottish Social Security Principles, namely the principle of equality and non-discrimination (and especially in the context of continuous improvement), the Scottish Government must be capable of directing payments and their impacts to those who stand to benefit from them.

¹ Women's Budget Group (2016) The impact on women of the 2016 Budget: Women paying for the Chancellor's tax cuts, citing House of Commons Library Analysis for Kate Green MP, April 2016.

² See Engender (2016) Securing Women's Futures: Using Scotland's New Social Security Powers to Close the Gender Equality Gap

³ Equality and Human Rights Commission (2018) The cumulative impact on living standards of public spending changes

1. WHAT DO WE KNOW ABOUT HOW MUCH IS UNCLAIMED AND WHY?

Since the start of 2019, Engender, alongside Scottish Women's Aid and the Coalition for Racial Equality and Rights (CRER), has been engaged in discussions with Scottish Government regarding the ability of Social Security Scotland and the Government to collect and analyse equalities data. Over the past few months we have undertaken multiple discussions with officials, during which our concerns that data regarding protected characteristics is not currently integrated into the application process for the Best Start Grant crystallised.

Best Start is the only payment currently live at Social Security Scotland for which direct application is required. The existing application form requires what has been described as the minimum amount of information necessary to make a payment, for example the name, address, bank information and qualifying benefit. It does not ask applicants to provide information such as their sex or race or any information on disability. It is possible to apply as a person who has given birth recently, as their partner or on behalf of the mother as person responsible for somebody under 20 who has recently given birth.⁴ As a result, any applications or decisions analysis excludes breakdown by protected characteristics.⁵

Some equalities data is collected through an optional feedback form at the end of online or telephone applications. We have also raised some concern about the design and use of an optional and separate form to collect characteristics data. Optional feedback will only be given by those with spare time or inclination and is unlikely to have a sufficiently high return rate to ensure its accuracy. In any event we do not currently know what the rate of return is.

Without equalities data it is impossible to measure the success of efforts to target take-up or reveal groups that may be under-claiming when measured against a demographic baseline. It will also be impossible without this data to identify and respond to issues such as a pattern of appeals decisions amongst groups which could indicate discrimination. These concerns are compounded by the limited data collection and analysis produced by the Department for Work and Pensions as well as the trend for household level data collection, including any information produced about Universal Credit.⁶

⁴ See application form for Best Start and Best Start Foods, available at < <https://www.mygov.scot/best-start-grant-form/Best%20Start%20Grant%20and%20Best%20Start%20Foods.pdf?inline=true> > accessed 20 October 2019

⁵ Scottish Government (2019) Best Start Grant: high level statistics to 30 June 2019, published August 2019

⁶ In response to criticisms about the impacts of UC on women's incomes the DWP recently produced figures indicating the proportions of UC paid by gender. These figures were an estimate made on the basis of salutation and first name of account holders, excluding any where the salutation or first name made it

Our three organisations have recently had assurances that changes are being introduced as matter of urgency, and we are due to meet the Cabinet Secretary for Social Security and Older People around the time that the Committee's call for evidence closes.

2. WHAT ARE THE GAPS IN KNOWLEDGE/RESEARCH AND HOW CAN THEY BE IMPROVED?

While we have now had assurances that Scottish Government intends to address the data gap as a matter of urgency, the details of this are yet to be fully discussed with us. It is obviously imperative that system changes which allow this information to be collected are in place before applications for the Scottish Child Payment go live, currently planned for autumn 2020.

We would also suggest that work to develop the take-up strategy include work to understand the demographics of Scotland in relation to social security. For example, research suggests that some ethnic groups are more likely to have larger families, and may therefore be more likely to benefit from the Scottish Child Payment. Where entitlement of a Scottish payment is linked to receipt of UC, the limitations of DWP data production will be of even greater consequence.

3. HOW CAN THE ADMINISTRATION OF BENEFITS BE IMPROVED TO MAXIMISE TAKE-UP? SPECIFIC EXAMPLES WOULD BE WELCOMED.

It is imperative that current and future application processes are designed to ensure the collection of equalities data, which can then be tracked over the longer term to reveal demographic trends and enable targeted interventions where particular groups are underrepresented. However, we also recognise the rights of individuals to determine when and how much data to provide and a need for forms to be as simple as possible. We would suggest that both needs can be balanced by the inclusion of a 'prefer not to say' option on equalities questions.

4. HOW FAR IS IT POSSIBLE FOR TECHNOLOGY TO CREATE A MORE AUTOMATED SYSTEM THAT USES INFORMATION GATHERED FOR OTHER REASONS TO AWARD BENEFITS AUTOMATICALLY? WHAT

impossible to guess and excluding joint account holders where it is unknown how access to the income is worked in practice. Furthermore these figures included no measurement against a baseline prediction of UC dependency by gender.

WOULD THE ADVANTAGES/DISADVANTAGES BE OF GREATER AUTOMATION?

We can see significant benefits in automation, particularly where concerns exist about the length or complexity of application forms, as the experience panels appear to have indicated. For example, eligibility for the Best Start Grant and Scottish Child Payment are likely to overlap significantly. Ability to store case information would also help in relation to the Scottish Child Payment, where recipients in work are likely to fall in and out of eligibility as their UC payment fluctuates. Automation and data storage – with consent – are therefore likely to speed up and smooth the transition in eligibility and prevent some potential for drop off.⁷

5. WHAT CAN WE LEARN FROM PREVIOUS CAMPAIGNS TO INCREASE TAKE-UP? SPECIFIC EXAMPLES OF PROJECTS OR APPROACHES THAT IMPROVED BENEFIT TAKE-UP, PARTICULARLY THOSE THAT WERE EVALUATED, WOULD BE WELCOMED.

N/A

6. ARE DIFFERENT APPROACHES REQUIRED FOR DIFFERENT BENEFITS AND DIFFERENT CLIENT GROUPS?

While this is likely to be the case, the difficulty of designing different approaches will be impeded by the existing shortage of equalities and demographic data. Even if changes are instituted quickly, the existing data will not provide the necessary breakdown to target many groups who might benefit.

7. WHAT KINDS OF ELIGIBILITY CRITERIA ENSURE BETTER TAKE-UP?

Eligibility should be as simple as possible. However, there is a significant body of evidence that paying benefits for children straight to the primary carer, usually the mother, increases household spending on children.⁸ Given that we know women are more likely to act as poverty managers, going without food or necessities so that others in the house have, it is also reasonable to assume that maximising mothers access to resources will have a positive effect on women's poverty, something

⁷ Scottish Government (2019) Scottish Child Payment: updated position paper

⁸ Lundberg, S. J., Pollak, R. A., & Wales, T. J. (1997). Do Husbands and Wives Pool Their Resources? Evidence from the United Kingdom Child Benefit.

recognised by the Child Poverty Action Plan, which acknowledges the connection between child poverty and women's poverty.⁹

It is important that steps intended to maximise the take up by widening the pool of eligible applicants – such as enabling a partner to apply on behalf of a main or primary carer, as is possible in the Best Start Grant – are subject to a gendered analysis. Women's access to resources could be further restricted by taking a household level approach, particularly where the household payment of UC exists and in circumstances of financial abuse. While households may choose to handle money however they see fit, the Scottish Government also has a duty to entrench rights to individual income, as it has recognised through its commitment to introducing individual payments of UC.

We would therefore recommend that applications for payments for children include some question about primary carer which is monitored alongside gender, and that any future payments introduced which are intended to spent on children explore options to concentrate eligibility on the primary carer.

8. HOW MIGHT THE DEVELOPMENT OF SCOTTISH SOCIAL SECURITY IMPACT ON TAKE-UP OF BOTH RESERVED AND DEVOLVED BENEFITS?

It is important that there are clear processes for signposting and referrals between Social Security Scotland and the DWP because of the scale of devolved payments and because the eligibility for many devolved payments depends on eligibility for reserved benefits. As we have noted above, the limitations of DWP data collection and publication has impacts for the Scottish take-up strategy.

Additionally, while we have not seen a draft of the initial strategy, we understand that it will focus only on social security benefits which are currently delivered, and not those planned for the near future including neither the Scottish Child Payment nor disability benefits. Because of the significance of these payments, we believe that the groundwork should be laid now, with work to research the demographics of recipients of current DWP benefits targeting similar groups.

9. ARE THERE OTHER QUESTIONS YOU THINK THE COMMITTEE SHOULD CONSIDER AS PART OF THIS INQUIRY?

N/A

⁹ Scottish Government (2018) Every child, every chance: tackling child poverty delivery plan 2018-2022

CONCLUSION

We welcome the Committee's inquiry into benefit take-up and the opportunity to outline our concerns as well as the constructive, yet ongoing, discussions with the Scottish Government to ensure equalities considerations are addressed. We are pleased to set out the current state of our discussions and hope to soon be in a position to positively report on steps taken to ensure the collection, analysis and use of equalities data in the Scottish social security system.

Because existing benefits have not included steps to collect this data, the first take-up strategy is unlikely to have the evidence base to respond accurately to the needs of specific groups. For this reason, we believe it is vital that the strategy acknowledges the gaps in available data and provides other forms of research from which some baseline status can be determined. Additionally, we are concerned that focusing only on the benefits currently administered may be a missed opportunity to build awareness amongst groups that stand to benefit from forthcoming payments and ensure that early take-up is as high as possible.

Finally we have expressed some concerns that steps to maximise take-up lack a sufficient gender analysis. As women continue to provide the majority of primary care, widening the pool of eligible applicants ignores women's lesser access to resources and the evidence linking women's and children's poverty. Without further reflection, these proposals could have an adverse effect on spending on children and women's economic position and safety.

FOR FURTHER INFORMATION

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ABOUT US

Engender is a membership organisation working on feminist agendas in Scotland and Europe, to increase women's power and influence and to make visible the impact of sexism on women, men and society. We provide support to individuals, organisations and institutions who seek to achieve gender equality and justice.