



**One Parent
Families Scotland**
changing lives, challenging poverty



The Scottish Affairs Committee inquiry examining the impact of UK welfare policies in Scotland

One Parent Families Scotland Submission

August 2019

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One Parent Families Scotland

One Parent Families Scotland (OPFS) is the leading charity working with single parent families in Scotland. Building on over seventy years of advocacy and service-delivery expertise, OPFS provides expert information, advice and support for one parent families, along with training activities, employability programmes and flexible childcare across Scotland. OPFS campaigns with parents to make their voices heard to change the systems, policies and attitudes that disadvantage single parent families. Our vision is of a Scotland in which single parents and their children are valued and treated equally and fairly. Our mission is to work with and for single parent families, providing support services that enable them to achieve their potential and help create lasting solutions to the poverty and barriers they face.

Single Parent Families

In Scotland single parent families are 29 % of families with dependent children (167,100 families)¹ The Poverty and Inequality Commission has highlighted that 37% of all children in Scotland living in poverty live in a single parent family² and 94% are women. 27 % of single parent households have a disabled adult and 16% have at least one child with a disability.³ The number of single parent households are projected to rise by almost a fifth (19%) by 2041.⁴

The most current statistics **show poverty rates for children living in lone-parent families are at 54% almost twice as high as those living in couple families (28%)**. However, poverty rates for people living in different family types vary across the countries in the UK. In England 54% of lone parent families are in poverty, the figure in Scotland is considerably lower at 42% - a 12% difference.⁵

¹ www.gov.uk/government/statistics/personal-tax-credits-2016-to-2017
www.gov.uk/government/statistics/take-up-rates-2016-to-2017

² <https://povertyinequality.scot/2018/02/Child-Poverty-Delivery-Plan-advice-February-2018.pdf>

³ www.gingerbread.org.uk/One-in-four-a-profile-of-single-parents-in-the-UK . page 4

⁴ <https://www.nrscotland.gov.uk/files//statistics/rgar/2018/rgar18.pdf>

⁵ <https://socialmetricscommission.org.uk/>

By 2021 single parents and their children will lose a fifth of their income due to welfare reform - an average of £5,250 a year⁶. The **predicted increase in the UK child poverty rate for children in single parent households to over 62%** will have a devastating impact on the lives and prospects of so many children.

The challenges for single parent families

Single parent families face significant challenges: poverty, isolation and loneliness, poor health or disability and judgemental attitudes. The majority of single parents are women, and many have experienced domestic abuse, so gender inequality is a key issue. Poverty and isolation have an impact on parent's and children's wellbeing, causing stress, anxiety and poor mental health.⁷ These challenges are the result of structural issues. It need not be this way. At OPFS we know that single parents have one thing in common: inner strength - the strength to cope with hard times; the strength to put their children's needs first; the strength to be incredible role models. We think it's time everyone recognised single parents potential and that their families should be valued and treated equally and fairly.

Being both sole carer and breadwinner is a difficult balancing act because of the lack of flexible and affordable childcare and the lack of secure and family-friendly employment. This is coupled with the fact that the causes of single parenthood, which include bereavement and relationship breakdown, are in themselves stressful for parents and their children.

Single parent families' life chances are affected by a range of UK and Scottish Government policies; however, welfare reform has been the key policy driver to increasing child poverty in single parent families. There has been a particular focus on out-of-work benefit cuts to reduce welfare spending and encourage people into work. However, most non-working single parents are out of work because they are caring for very young children, studying or unable to work. They're unfairly hit by cuts which bear no relation to their intention or ability to work.

⁶ <https://www.equalityhumanrights.com/sites/default/files/cumulative-impact-assessment-report.pdf> p153

⁷ <https://www.opfs.org.uk/policy-doc/community-connections-briefing-papers/>

Key points

The key points in OPFS submission are:

Supportive Social Security

Single parents need a social security system which recognises their needs and provides an adequate safety net as well as playing a role in preventing poverty.

In the short/ medium term OPFS recommendations include:

- End the policies that penalise single parent families - the working age benefits freeze, the two-child limit and the benefits cap
- An end to job-seeking conditions for single parents with pre-school aged children.
- Welfare conditionality within the social security system should be rebalanced. The current preoccupation with sanctions backed compliance needs to be urgently replaced with more emphasis on personalised support tailored for single parents.
- Pause and reform Universal Credit. Address the issues with UC especially:
 - the 5-week wait for benefits
 - poor administration (particularly of childcare costs)
 - conditionality and sanctions
 - Single Parents under 25yrs should be paid the same rate for Universal Credit as parents over 25yrs
- Increase the value of benefits and tax credits paid to low-income families to reflect living costs. As well as restoring link between benefits and inflation to also make up for the loss in the real value in children's benefits as a result of the 4-year freeze and previous sub-inflation increases in benefit rates
- Several short-term actions should be taken by the Westminster Government to make it easier for parents to find and afford childcare:
 - Make sure every parent is better off working after paying for childcare. This includes increasing the maximum amount of childcare costs paid for under Universal Credit and moving to upfront payments for childcare to make it possible for parents to move into work
 - Consider how current spend on childcare could be reallocated to better meet the needs of disadvantaged and low-income children, including current underspend of the Tax-Free Childcare budget

In the long-term we would support a move away from policies that reflect the dominant approaches of 'Work First', where programmes focus mainly on compulsory job search and short-term interventions to facilitate a quick return to work, to human capital development (HCD), where programmes tailor services to promote personal development, further education and longer-term skills.⁸ Skills enable people to participate and progress in employment . Providing people with the opportunities to develop skills - irrespective of who they are and where they live - is a

⁸ https://strathprints.strath.ac.uk/39220/1/Lindsay_et_al_2007.pdf

key driver of inclusive growth, which sits at the heart of the Scottish Government's Economic and Labour Market strategies.⁹

We believe single parents should have the opportunities to develop their skills and qualifications. Evidence shows that having qualifications is linked with positive social and economic outcomes for individuals and the communities they live in.¹⁰

General Comments

OPFS welcomes this opportunity to submit evidence on the impact of UK welfare policies in Scotland. The impact of welfare reform on single parents should also not be understated - for both working and non-working families. Single parents were the worst affected household type by the 2010-2015 coalition government's programme of welfare reform. They continue to be one of the worst affected groups in the reforms which have taken effect from 2017 onwards.

On average, single parents are expected to lose around 15% (just over £3,800 annually on average) of their net income by 2021/22 as a result of 2010-17 tax and benefit reforms.¹¹ This is the biggest loss among different household types. We believe the current welfare system focuses too much on pushing people into any job, leaving single parents exposed to poor quality, inflexible and unsustainable work. Regardless of employment status, state support should be sufficient to cover basic living costs and recognise the additional needs faced by single parents.

OPFS Response

1. What are the unique drivers of inequality in Scotland? Does Scotland have different welfare needs from the rest of the UK?

Some groups are more severely impacted by welfare reform:

Single parents, the majority being women, face greater poverty as a result of welfare reform. A recent EHRC report shows that by 2021 single parent families will lose 20% of their income due to welfare reform - an average of £5,250 a year.¹² We know from our work in local communities single parents with disabilities or mental health problems have also been adversely affected (financially and health wise) by ongoing welfare reform, particularly the roll out of Universal Credit. We fully support the findings of SAMH that "far from simplifying the welfare system and supporting people into work, for people with mental health problems Universal Credit has created new barriers and added to people's distress."¹³

⁹ [www.scot.gov.uk/Scotland's Future Skills Action Plan Sept 2019](http://www.scot.gov.uk/Scotland's-Future-Skills-Action-Plan-Sept-2019)

¹⁰ https://www.oecd.org/skills/piaac/SkillsOutlook_2013_ebook.pdf

¹¹ Portes, J. and Reed, H. (2017) *Distributional results for the impact of tax and welfare reforms between 2010-17, modelled in the 2021/22 tax year*. EHRC.

¹² <https://www.equalityhumanrights.com/sites/default/files/cumulative-impact-assessment-report.pdf> p15

¹³ <https://www.samh.org.uk/documents/ItWasAConfusionReport.pdf>

Single Parents in Scotland are more likely than parents in couple families to live in areas of high deprivation and to rent their home from a social landlord.¹⁴ Over half (54%) of lone parents with children aged around 10 months live in areas of high deprivation, compared to 18% of couple families. Over half of single parents living only with their children rented their home from a Local Authority, compared to just 13% of couple families. Only 12% of single parents were owner occupiers, compared to 74% of couple families. We know from our work that single parents in Scotland's rural communities face unique barriers around the cost of accessing services, the lack of affordable, flexible childcare and keeping up with the requirements of a digitised Westminster benefits system.

Why are lone parents more likely to be in poverty?

The UK welfare system is now underpinned by a job-first policy which has in effect transformed social security to become an 'individual responsibility gateway' into employment. The overall philosophy of JCP is that any job is a good job and that the best way to succeed in the labour market is to join it, developing work habits and skills on the job rather than through training or further education. The strong message is that, for participants, employment is both the goal and the expectation.

- Access to benefits has become conditional on harsher work and work search requirements, and the reforms have also involved an increased use of benefit sanctions.¹⁵
- Stricter sanctions regime in the form of loss of benefit, enhanced under the new Universal Credit (UC) system. The goals are to provide a 'clear and strong' sanctions regime, which will be easy to understand and explain, and which will "incentivise claimants to meet their responsibilities."¹⁶
- UC involves in-work conditionality with the requirement for people to attain an 'earning threshold' set at the level of effort it is reasonable for an individual to undertake.

However, a 'job first' approach by itself is inadequate to address child poverty for single parent families, because:

- High quality affordable, flexible, childcare to meet the demands of the modern labour market is not widely available.¹⁷
- There is a lack of appropriate, flexible, quality job opportunities which would allow enable single parents to move into and sustain employment which lift them out of poverty;¹⁸
- Single parents not in paid employment often face additional barriers to work, over and above their caring responsibilities.¹⁹ Compared to single parents in employment, single parents not in work are:

¹⁴ <http://growingupinScotland.org.uk/wp-content/uploads/2013/04/Lone-parents.pdf>

¹⁵ <https://www.jrf.org.uk/sites/default/files/jrf/migrated/files/Welfare-conditionality-UK-Summary.pdf>

¹⁶ http://www.welfareconditionality.ac.uk/Briefing_LoneParents_14.09.10_FINAL.pdf

¹⁷ https://www.familyandchildcaretrust.org_2019 <https://www.bbc.co.uk/news/uk-scotland-31527481>
<https://www.bbc.co.uk/news/uk-scotland-31527481>

¹⁸ <https://www.jrf.org.uk/report>

¹⁹ [Scottish Household Survey 2017](http://www.scotlandscotland.gov.uk/Scottish-Household-Survey-2017)

- More likely to have low or no qualifications (65% vs. 31%)
- Less likely to hold a current driving licence (31% vs. 68%)
- Less likely to report their health as good or very good (58% vs. 80%)
- Over two-thirds - 68 per cent - of single parents enter the three lowest paid occupation groups: including 'unskilled' jobs like cleaning, shelf-stacking and catering work; jobs in sales or retail; and personal service jobs, such as carers or child minders.²⁰
- In-work child poverty rates for single parents is high and have been rising.²¹ More than a third (35%) of children in part-time working lone parent households were in poverty in 2018, up from 22% in 2011 and 30% of children in full-time working lone parent households were in poverty up from 18%.

2. How well is Universal Credit working in Scotland? Are there issues with Universal Credit that are specific to Scotland compared to the rest of the UK?

Social Security benefits are a lifeline for many single parents and their children, whether in work or not. Barriers to entering and progressing in work, high living and childcare costs and unpaid child maintenance all add to the financial strain on single parent families meaning Universal Credit is so vital.

At OPFS we see a step change in the poverty facing many families who have been transferred to Universal Credit. Delays in payments, administrative errors and problems with childcare payment for parents in paid work have let some families almost destitute. Even parents in work are being forced to go to foodbanks and in one case a local nursery in Glasgow has been feeding children because their parent is penniless.

Hunger, anxiety, shame: the universal credit 'catastrophe' is hitting single parents hardest of all. OPFS wants to see a benefit system which is fit for purpose - one that is linked to financial and personal need, minimises sanctions, and genuinely makes work pay. We believe that now is the time for a fundamental review of the purpose of Universal Credit with a view to rebalancing the focus on meeting the needs of people as opposed to delivering value for money; focusing on the needs of the most vulnerable as much as it focuses on getting people back to work. Universal Credit can no longer be seen as a benign attempt to simplify the benefits system. It was supposed to make accessing benefits simpler and more effective. It has not done that. It has left too many people worse off, putting them at risk of hunger, debt, rent arrears and food banks.

UC General Problems

The experiences of single parents already on Universal Credit highlight significant problems with both its design and delivery which includes:

- A lack of awareness as to how the new UC system works

²⁰ <https://www.gingerbread.org.uk/policy-campaigns/employment-and-skills/>

²¹ [DWP_households-below-average-income-199495-to-201718](https://www.dwp.gov.uk/statistics/households-below-average-income-199495-to-201718)

- Significant problems for parents accessing a PC, laptop or tablet to complete the application form
- A lack of digital skills to operate IT to complete claims. In addition, a lack of digital access to maintain the Universal Credit journal. While most single parents use their mobile, they don't have access to digital platforms to maintain their on-line journal. Many organisations provide support to apply but not to maintain a claim which can involve numerous conversations between case workers, work coaches and parents.
- Barriers to applying because of the lack of the required evidence of identity and access to a current bank account
- In-built delays. The 5-week delay in payment causes serious hardship - we welcome the decision to scrap the seven-day waiting period. However, these advance payments are still loans which must be repaid; there is still a significant wait to receive the first proper payment.
- The need for improved access to, and affordable repayment of, advance payments.
- New job seeking requirements for parents of three and four-year olds without enough flexible, affordable childcare and flexible work opportunities.
- Universal Credit Scottish Choices - being paid Universal Credit twice a month rather than monthly; having Universal Credit housing element being paid directly to landlords - are not explained properly to claimants. For example, problems that can arise from budgeting and paying rent are not highlighted. Many parents think payments will be fortnightly rather than twice a month. Increased publicity for Universal Credit Scottish Choices is needed to give better access.
- The quality of information and supports given to single parents from Work Coaches is very variable. JCP staff now deal with a mixed caseload and there are no longer specialist work coaches for vulnerable groups, and this can affect the experience single parents have. A return to these specialist advisers for both JCP and Social Security Scotland would improve the journey for single parents.
- Ensure entitlements are clear and single parents' needs are recognised in UC claimant commitments, and they know their rights.
- Single parents under 25yrs get a reduced UC standard allowance rate, even though they have the same costs as older parents. In most cases young single parents are given no warning that when they move from Income Support to Universal Credit, that they will get less benefit. It therefore means that they can find themselves quickly having their benefit cut at a time when they are adjusting to a monthly budget . They should be paid the same rate for Universal Credit as parents over 25yrs.
- The high rate of Third-Party Deductions deepening existing financial problems, causing family hardship, making it difficult to pay for food, clothing and heating.

UC and childcare - key issues

OPFS services across Scotland have reported that many single parents can struggle with the up-front costs of childcare, such as deposits to hold childcare places, which must be paid before their first pay cheque comes in. Furthermore, with the roll-out of Universal Credit which is paid in arrears, any support for childcare costs for low income families will not be readily available for those dealing with costs prior to employment. As a result, many single parents are locked out of work due to the prohibitive cost of childcare. Key issues are:

- Because of the lack of available jobs during school hours single parents being pushed to take up shift work at times when childcare is expensive or just not available
- Parents are often unable to get a payment receipt from their childcare provider in time to meet the deadline set by JCP for claiming help through Universal Credit
- Childcare costs that cover 5 weeks then 4 weeks distorts whole awards
- Parents can be left without access to a Budgeting Advance because of level of advance given at their first claim
- Childcare costs are not paid in advance and in addition the 5 weeks wait for first UC payment causes extreme hardship with parents having to go to foodbanks because they have had to use their wage to pay their childcare
- Cases of JCP Childcare Accounts being frozen due to one piece of information being missed out
- Childcare stopped by provider if parent not paying quick enough and not able to guarantee they will back pay
- Parents not understanding the whole process and forms
- Data needed can delay application - e.g. Care Inspectorate CS reg number.

OPFS recognised that our services would require a new focus to cover the challenges of the UC roll out - to engage with parents: to prepare for UC; support to claim; and offer advice & support on the impact of being receipt of UC. We have worked with Glasgow City Council to develop and roll out a new Universal Credit Support and Connect Service. See case study:

Case Study - OPFS Universal Credit Support and Connect Service

Aims

- Raise awareness of UC across Glasgow
- Support vulnerable single parents to:
- Navigate the UC application process
- Link to additional local resources
- Support them to meet the on-going requirements of UC entitlement

Target Groups

- Young parents (Under 25 yrs.)
- Parents whose relationships has broken down
- Single parents moving in and out of work
- Parents affected by domestic abuse
- Parents moving from IS or ESA onto UC
- SP's experiencing a change to circumstances

Service Delivery Model

Universal Credit Advisers work in local communities across Glasgow to:

Raise Awareness of Universal Credit

- Local Roadshows and Community Events
- Raising Practitioner's Awareness
- Single Parent Advice Surgeries

Supporting access Universal Credit

- Support to access local resources
- Local family finance surgeries
- 1-to-1 support to make UC claims

Mitigating the impact of UC

- Crisis Support
- Integrated Holistic Support
- Support access to Local Services

Single Parent Conditionality

The impact of conditionality on single parents provides insights into the way welfare reforms, austerity cuts and 'work- first' policies disadvantage women.

OPFS research²² shows the present benefits conditionality regime disproportionately affects vulnerable single parents, particularly those who have poor health or are disabled, often leaving them distressed, impoverished and reliant on food banks. Our research involving interviews with single parents over a period of 2 years shows the current benefit conditionality regime, and the fear of being sanctioned, is resulting in worsening health, especially mental health, with resulting negative impacts on children.

Single parents have been made subject to stricter JCP work-seeking requirements however sadly there is a lack of flexibilities to take account of child care and family responsibilities. As conditionality has been tightened the availability of flexible, affordable childcare to meet the demands of the labour market is still in short supply as detailed above.

The barriers to accessing vocational training and further education caused by the 'work -first' approach is also a major issue, and this contributes to the creation of further hurdles for single parents to progress in employment.

Despite the contribution of conditionality to increased single parent employment we are concerned about the longer-term value of this approach. In particular, there is a very negative impact which the system has on the quality of work that single parents feel compelled to undertake due to these jobcentre conditions. Over two-thirds (68 per cent) of single parents enter the three lowest paid occupational groups, which tend to be the least secure, lowest skilled jobs, with very limited opportunities for progression.²³ The pressure to take any job available often means more insecure, rather than sustainable, work and limited gains in living standards as a result.

The figures on working single parents seem to reflect these concerns. A third of children with a working single parent lived in relative poverty in 2015/16.²⁴ Single parents are more likely than the average employee to be trapped in low-paid work.²⁵ A 2016 survey found working single parents surveyed as likely to have to borrow to make ends meet as those not working; around one in ten working single parent surveyed had relied on last resort lenders such as payday lenders, 'doorstep' lenders and foodbanks.²⁶

Given the ongoing financial strain faced by many single parent families OPFS questions the legitimacy of withholding or suspending benefit payments. We know

²² <https://www.opfs.org.uk/wp-content/uploads/OPFS-SP-conditionality-wellbeing-report.pdf>

²³ Newis, P (2012) It's off to work we go? Moving from income support to jobseeker's allowance for single parents with a child aged five.

²⁴ DWP (2017a) *Households below average income: 1994/95 to 2015/16*. Gingerbread analysis.

²⁵ D'Arcy, C. and Hurrell, A. (2014) *Escape plan: understanding who progresses from low pay and who gets stuck*. Resolution Foundation.

²⁶ Rabindrakumar, S. (2017a) *Paying the Price: still just about managing?* Gingerbread.

from our experience on the ground that these policies increase families' vulnerability and risk of debt rather than moving them to a more secure financial footing.

3. What impact has the Benefit Cap had in Scotland? Have certain communities been more disproportionately affected than others?

The benefit cap - intended to encourage benefit claimants into work by capping total benefits until they are working for at least 16 hours a week- has hit single parents hard. The latest data shows single parents made up nearly three-quarters of capped households.²⁷

In particular there is a toxic intersection of Universal Credit, Sanctions, the Benefit Cap and the Requirement to Work on single parents with children under 5 years old. Until recently the rules around benefit conditionality required single parents to look for work when their child turned 5yrs, but Universal Credit has reduced that requirement to when children reach 3 years old. Not only can single parents be sanctioned if they are seen not to comply, they can also have their benefits capped if they live in high rent areas.

One of the few ways of avoiding the benefit cap is if parents work over 16 hours a week. However even if their children are under 2yrs, they still have to be working 16 hours or over, whether they are on Income Support or on Universal Credit.

They are faced with two equally undesirable alternatives, either:

- To accept the cap, go deeper into debt, face eviction and the almost certain reliance on food banks
- Take a job of 16 hours or more, which is a challenge because of the lack of childcare for under 2yrs
- Move away from children's schools and the support networks of family and friends to a lower rent area, usually to an unfamiliar part of the country.

The combination of sanctions, the benefit cap and the requirement to work is inhumane.

Most capped single parent households have very young children. Under legacy benefits, three-quarters (76 per cent) of these capped single parents' youngest children were of pre-school age (under five years) and therefore not subject to full job-seeking conditions under work-related benefit rules, despite the government's intentions with the benefit cap. A third (31 per cent) of capped single parents had a youngest child aged two or under.²⁸

OPFS and Child Poverty Action Group in Scotland (CPAG) recently published a report²⁹ on the impact of the lower Benefit Cap and the extent to which the benefit cap is being mitigated by local authority discretionary housing payments (DHP's). Nearly

²⁷ <https://www.gov.uk/government/statistics/benefit-cap-number-of-households-capped-to-may-2018>

²⁸ <https://www.gingerbread.org.uk>

²⁹ https://www.opfs.org.uk/wp-content/uploads/CPAG_OPFS_Benefit_Cap_Report_Feb18.pdf

three quarters of people affected by the benefit cap are single parents; half have a child under the age of three. Parents in this group are relatively unlikely to work considering the needs of very young children and that there is no free childcare provided for under twos and currently only 15 hours a week for two to four-year olds. These parents would not be required to work or look for work in return for income support.

People can apply for a DHP from the local authority if they are in receipt of housing benefit or the housing element of universal credit and are having difficulty meeting housing costs.

CPAG and OPFS sent a Freedom of Information request to all Scottish local authorities to ask about their response to the lower benefit cap and received a response from each one. The majority of local authorities said they would determine DHP awards to mitigate the benefit cap on a case by case basis, however the response amongst other local authorities varied.

OPFS is opposed to the benefit cap in principle because it breaks the link between need and entitlement which is fundamental to a means-tested social security system. The Benefit Cap policy causes real misery to single parents with very young children - babies & toddlers - who are subject to the cap despite there being no official requirement for them to find work. Single parents with children under two do not qualify for free childcare and so find it difficult and often impossible to juggle working the minimum 16 hours a week required to evade the cap while finding means to care for the child. The cap forces the single parents and children affected into poverty and homelessness, leaving them to rely on food banks and help from charities - at great cost to society both now and in the future.

4. What is the impact of the Two-Child Limit on families in Scotland?

Within the wider context of welfare reform, this policy represents another cap on the amount of public spending on welfare. It adds to measures which include a freeze on benefits, tighter limits on housing support and the introduction of an overall benefit cap. These policies move away from the needs-based principles on which the British welfare system is based.

The policy restricts help through means-tested family benefits to two children only. In doing so, the two-child policy breaks the fundamental link between need and the provision of minimum support and implies that some children, by virtue of their birth order, are less deserving of support. It is a very large direct cut to the living standards of the poorest families of up to £2780 per child, per year.³⁰

The Westminster government's decision to impose a two-child limit on benefit payments not only stigmatises mothers but sets apart siblings. Anything which sends the implicit message that a child is unwanted, unvalued or less important surely cannot be defended? This policy is having a profoundly negative impact on family life, as well as wider implications for society. It is the worst kind of government policy - judgemental, not based on evidence and is punishing those very families who already live in poverty after years of welfare cuts and austerity.'

Across the UK the two-child limit will see 300,000 children pushed into poverty and one million children, already in poverty, pushed even deeper into poverty by 2023/24.³¹

OPFS is deeply concerned about the exceptions to the two-child policy, for children conceived as a result of rape - which forces highly sensitive disclosure. We do not support the third-party evidence model for the rape/coercion exception and the risk that women claiming this exception will be exposed to further trauma and breaches of privacy.

In Scotland we are not aware of any organisations that are operating as third-party referrers for the 'rape clause' and OPFS and our colleagues in women's organisations have robustly criticised the introduction of the two-child limit and its resulting exemptions³² CPAG have produced additional evidence of the harm arising from this policy.³³ We were very disappointed that the recent legal challenge against the two-child limit was unsuccessful.³⁴

5. How effective has cooperation been between the UK and Scottish Governments on the devolution of new welfare powers to Scotland?

³⁰ <https://www.ifs.org.uk/publications/13804>

³¹ <https://cpag.e-activist.com/page/43566/action/1?locale=en-GB>

³² <https://www.engender.org.uk/news/blog/the-family-cap-and-rape-clause-where-do-we-go-from-here-/>;
<https://www.engender.org.uk/content/publications/Engender-Parliamentary-Briefing-on-Child-Tax-Credit-and-Child-Element-of-Universal-Credit.pdf>

³³ <https://cpag.e-activist.com/page/43566/action/1?locale=en-GB>

³⁴ <http://cpag.org.uk/content/lone-parents-aim-supreme-court-ongoing-legal-challenge-against-'two-child-limit'-tax-credits>

It is our observation that there seems to be a lack of trust between the two governments. From our experience in working on the newly devolved suite of benefits it appears that DWP hold much of the control. Having said that the Best Start Grant, Carers Supplement etc are a good example of how the Scottish Government have worked well with the DWP to ensure access benefit entitlement, however it will be interesting to see what happens when the weekly ongoing benefits shift i.e. disability payments.

6. What challenges are posed by the DWP administering benefits on behalf of the Scottish Government? How can these challenges best be managed?

The DWP, while having the experience of delivery, also have a range of historic problems that have resulted in the distrust of single parents. An example of this is the roll out of Universal Credit which has been less than transparent and has resulted in very negative reactions from across the third sector. The DWP also do not have the same ethos of dignity and respect which the Scottish Government have enshrined in their policies. At a local delivery level, it will be interesting to see how this will work on a practical level.

7. What changes might be necessary to help manage the transfer of claimants and data from the Department of Work & Pensions to Social Security Scotland?

If the approach was taken as a joint approach where both the DWP and the Scottish Government had equal status and recognition and the whole process was independently monitored and evaluated. Any transfer should be robustly tested before being put into service and continually tested.

Consultation between the DWP, Scottish Government and third sector organisations to get their input will be important as well as a high-intensity consultation with service users before any transfer system takes place.

8. What impact could diverging welfare policies in Scotland and the rest of the UK have on welfare claimants in Scotland?

A different approach to social security in Scotland from that of the UK government, has the potential to transform the role of social security in tackling and preventing poverty. The Scottish Government has given an ambitious set of commitments for a devolved system. "Respect for the dignity of individuals" is at the heart of this vision. OPFS was involved, along with colleagues in SCoWR in supporting the social security principles that are set out in the first section of the Social Security (Scotland) Act 2018.³⁵ These are:

- Social security is an investment in the people of Scotland

³⁵ <https://www.socialsecurity.gov.scot/about-us/social-security-scotland-act-2018-principles>

- Social security is itself a human right and essential to the realization of other human rights
- The delivery of social security is a public service
- Respect for the dignity of individuals is to be at the heart of the Scottish social security system
- The Scottish social security system is to contribute to reducing poverty in Scotland
- The Scottish social security system is to be designed with the people of Scotland on the basis of evidence
- Opportunities are to be sought to continuously improve the Scottish social security system in ways which
 - (i) put the needs of those who require assistance first, and
 - (ii) advance equality and non-discrimination
- The Scottish social security system is to be efficient and deliver value for money.

There is a commitment to delivering devolved benefits in Scotland based on dignity, respect and human rights is very welcome. OPFS has been very pleased to support this approach by supporting parents to be involved in the development of some of the newly devolved benefits.

- OPFS supported 12 parents to trial completing Best Start Early Years and School Age payments for Scotgov in run up to launch date for both benefits. We also have parents who applied for the pregnancy and baby payment applications so can get a group together from all these parents. We held co-production meetings with Scotgov researchers & parents to help develop Best Start Food Grant Young single parents met a Scottish Government researcher to discuss the new Job Grant for young people and we arranged 2 workshops in Maryhill and Motherwell with Scotgov officials to capture young single mothers view Social Security Scotland (SSS) is now set up and it's benefit delivery functions are being rolled out. There are 2 key emerging strategic issues around social security. OPFS has ensured the impact on single parents of 2 key developments are being considered: Universal Credit Split Payment; Scottish Government commitment to introducing a new Income Supplement. OPFS has been involved in enabling Scottish Government to listen to parents' views on these 2 key developments.
- OPFS was involved in the Carers Allowance Supplement Introduction Group. OPFS inputted views on the design of the notification letter and the correspondence which S.G. will use around not only this payment but all the disability benefits under the devolved powers. This is particularly complex as single parents are adversely affected by Universal Credit which has an impact on eligibility to this payment.

The Scottish Government has also announced that it will introduce a Scottish Child Payment in 2021, with full implementation by the end of 2022, which they estimate could lift 30,000 children out of poverty. OPFS is supporting Scotgov researchers to discuss with parents how best to implement this commitment. All these policies are

likely to reduce poverty, financial hardship and increase sense of control, with positive benefits for society as a whole.

Conclusion

The UK is signatory to several international treaties that guarantee social and economic rights. For example, the International Covenant on Economic, Social and Cultural Rights (ICESCR) which guarantees the right to an adequate standard of living including adequate food, clothing and housing (Article 11 (1)), the fundamental right of everyone to be free from hunger, (Article 11(2)) and the right to social security (Article 9).³⁶ Other relevant protections include the United Nations Convention on the Rights of the Child (UNCRC)³⁷ which guarantees children the right to a standard of living adequate for the child's development (Article 27) and the right to benefit from social security (Article 26). These are just two examples.

There is mounting evidence that the UK Government's welfare reform programme is in breach of these treaties. Professor Philip Alston's report on poverty in the UK³⁸ highlights the erosion of important social security and public service safety nets, e.g. cuts to social care multiplying the impact of social security cuts and poverty amongst disabled people. Professor Alston talks about "social re-engineering" - where social security changes have led to families struggling "against mighty odds" and people who have little hope of being unlocked from poverty.

We believe that our social security system should prevent poverty, treat people with dignity and respect and support everyone to flourish.³⁹ Therefore a human rights approach must be incorporated into both the design and delivery of social security and services. Monitoring design and outcomes of services against a human rights-based approach is an important tool to hold governments and service providers to account.

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³⁶ <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CESCR.aspx>

³⁷ http://www.unicef.org/crc/files/Rights_overview.pdf

³⁸ [Professor Philip Alston's report on poverty in the UK](#)