Dear Minister for Employment,

Thank you for coming to meet with us last week. I think that it was a constructive start to a positive working relationship in future. We are also extremely pleased to accept your offer of a public meeting in the New Year. I will ask the Committee clerks to contact your staff to make the arrangements.

In terms of our discussion there were a number of action points to follow up on. I have outlined them below.

In response to questions from Members you agreed to find out how many landlords requested, or were in agreement with, the change to housing cost payments direct to tenants. You also agreed to provide statistics on the level of fraud in the system. I look forward to hearing from you on these points.

You also noted your interest in the Committee’s recent fact finding visit to Highland to learn more about the roll out of Universal Credit. Please find a summary note of the points raised with the Members attached.

I have also included the submissions received during our inquiry into the impact of social security on women from the Scottish Refugee Council and Women’s Aid which outline the lack of autonomy which affects some women. You will be able to access the report itself using this link. We would be pleased to hear your thoughts on our conclusions and recommendations.

You said that you were happy to look into the case of Clare Adamson’s intern from the Centre for Racial Equality who was required to leave their internship early on the first day to return to Glasgow to sign on or face sanctions. This case was included in the package of anonymised information which was sent to the Rt Hon David Mundell earlier this year.

I have enquired further with the individual to see if they would reconsider their stance on preserving their anonymity. However, unfortunately, they are still very concerned about the potential negative impact this may have on their case when they next visit the job centre. As such, I have not been able to provide their details.

We warmly anticipate the continuation of this productive dialogue in the New Year.

Yours sincerely,

HUGH HENRY MSP
CONVENER
This paper provides a summary of the main points which were raised with the Committee Members during the fact finding visit.

Context

- Rural area means that transport is complicated, time consuming and expensive.
- Many areas have poor or nonexistent internet which makes digital by default difficult.
- The majority of jobs are fluctuating, seasonal and low paid.
- Finding affordable housing can be difficult because of the number of holiday lets.

Housing cost element of UC

- The housing cost element of the benefits that make up UC is the area which is causing the majority of the problems / delays.
- 80-90% of those on UC are in rent arrears. The average rent arrear for a non UC tenant is £200 for UC claimant £1000 and for those in UC in temporary accommodation £2100. However, a claimant will always potentially be in arrears on UC as there is a 5 week period before the first payment is made.
- Stakeholders suggested that the DWP had no history dealing with the housing side of things. As such they were not considering the role of the landlord who will have their own priorities and bills to pay. Delayed payments can have knock on impacts.

What changes to the housing element would be welcome?

- Payment of UC on a single day of the month instead of the anniversary of the individual's first claim.
- Giving tenants the choice of a direct payment of housing costs to the landlord.
- Flexibility to vary the frequency of payments.
- Temporary accommodation should be excluded from Universal Credit.

Temporary Accommodation and UC

- UC is meant to cover the costs of temporary accommodation but it currently isn’t. This is being subsidised by Discretionary Housing Payments which are not designed for this purpose.
- There are currently 11 live cases in Highland. Although numbers on UC in temporary accommodation are expected to rise.
- Transient and chaotic nature of people’s lives may mean that the claimant has moved on before the UC monthly assessment period has completed leaving the landlord with no payment. Alternatively, a new landlord may receive a full month’s payment even though the claimant has only stayed with them for a few days. Landlords are expected to work out this discrepancy themselves.
**Data sharing / colocation**

- Data sharing between organisations is still problematic and many updates have to be done manually which can cause delays. For example information and notifications on other benefits come through ATLAS or CIS. This is not the case with UC. However, things are slowly improving.
- Having a single point of contact at the council who can deal with the DWP has been very helpful.
- It is suggested that co-locating council and DWP services in the same building would improve communication and the customer experience.

**Claimant experience**

- Stakeholders suggested that the policy in essence was good but that claimants were not adequately prepared by the DWP for the scale and nature of the changes.
- Demand for advice services in Highland is at a 7 year high. DWP officers are reported as being inconsistent and not giving out helpful information. E.g. short term benefit advances.
- Claimant commitments had been unrealistic leading to sanctions. However, anecdotal reports that this is improving.
- If you start a new job at a certain salary then UC stops immediately. Claimant will need to survive until the first pay check. Advice being given is to not declare the job, over claim to get through the month and then pay it back.
- Uncertainty leads to huge fear and anxiety which is detrimental to mental health. Claimants feel like they are discriminated against and viewed as scroungers.
- HUG user group would encourage the DWP to look differently at how work is considered. It doesn't all need to be full time, paid work. Part time and volunteering opportunities should count for those who are less able.
- Customers are not aware that they need to notify the authorities of changes or apply separately for connected benefits. E.g. Council Tax Reduction.
- Benefits like JSA had implicit consent for benefit advisers to talk to DWP on their clients behalf. This does not exist with UC and leads to delays and difficulties.
- It can be difficult organising an 'Alternative Payment Arrangement'

**Local Authority experience**

- The roll out delays means that the Council is finding it hard to balance its staff numbers with the level of work.
- All landlords in Highland, whether council or Housing Association, have had to increase their housing management staff resource and costs in order to deal with UC.
- The admin grant for administering UC is decreasing faster than the caseload is going down. The admin grant has been cut by 30% whereas the caseload has only decreased by 8%. This leads to budget and service delivery issues.
- Council suggested a ‘spend to save’ fund which would allow them to invest in order to gain efficiencies in future.
- There is no personal contact or relationships with the UC service centre. They will not have phone conversations with the council. It all must be by email and it will be a different person each time.
- Procurement difficulties can stop organisations working together to deliver employability projects because their geographical procurement boundaries don’t align.

**DWP perspective**
- The Highland Operational Forum is working well and there is a good working relationship locally between all organisations.
- It is a ‘test and learn’ environment and things are improving.
- Local authority has coached DWP staff on providing debt and personal budgeting advice.
- The digital one account will allow claimants to manage all aspects of their benefits from one place. Telephone appointments are offered for the very remote.
- Trials on universal support are ongoing in Dundee and Argyll & Bute.
- UC claims can be paused for 6 months if the claimant moves into work. If they need to come back to UC they can pick up the claim without starting from scratch.
- UC should allow people to take up seasonal / low paid work without the same level of fear about how it will impact on benefits.

**Non Dependent Deductions**
- The increase in nondependent deductions means that a family with a child who enters work now need to consider the household income. Will the additional income of the child / dependent be worthwhile overall financially or will it lead to a decrease in benefit?
Annexe B

WRITTEN SUBMISSION RECEIVED FROM SCOTTISH REFUGEE COUNCIL

About Scottish Refugee Council

1. Scottish Refugee Council is Scotland’s leading refugee charity working to ensure that refugees seeking protection in Scotland are welcomed, treated with dignity and respect, and achieve their full potential.

2. Our women’s project works in partnership with the Refugee Women’s Strategy Group (RWSG), a group of refugee and asylum seeking women whose aim is to represent the views of refugee women to decision makers on the issues that affect their lives in Scotland. We include reference to evidence produced by the RWSG in our response.

3. Our Holistic Integration Service supports refugees in Scotland and their family members to access welfare, housing, health, education, employment and social support upon being granted leave to remain. We draw on evidence from our direct services to illustrate the impact of welfare reform on refugee women in Scotland.

Our response

What is the impact of welfare reform on women?

4. Scottish Refugee Council is a member of the Scottish Campaign on Welfare Reform\(^1\) and of a coalition of organisations working with diverse women across Scotland (Engender, Close the Gap, Scottish Women’s Aid, and the Scottish Council of Voluntary Organisations) to raise awareness of the impact of welfare reform on women in Scotland. We fully endorse the evidence submitted by these organisations to this inquiry and would direct the Committee to the joint position paper we published in April for our position on the impact of welfare reform on women in Scotland more generally.\(^2\)

What is your clients’ experience of being on benefits or employment support?

5. We focus this response on the impact of welfare reform on refugee women specifically. Like women, refugees in Scotland have multiple and intersecting identities, which shape their experiences of welfare reform. There are, however, particular issues faced by refugees relating to the contexts they come from, their experiences of persecution, their journeys prior to seeking protection, and the systems and processes of seeking asylum in the UK, which impact significantly on their experiences of welfare reform. Many of these are recognised in Scotland’s refugee integration strategy, *New Scots: Integrating Refugees in Scotland’s Communities 2014-17*, published by the Scottish Government, Scottish Refugee Council and COSLA.\(^3\)

---

6. Refugee women in particular experience many gendered barriers to seeking international protection, experience high levels of gender based violence\(^4\), and often face challenges to accessing protection in an asylum system that presents many barriers for women, for example, a lack of childcare for asylum interviews, and a lack of recognition by decision makers of the difficulties in disclosing gender based violence and of the contexts from which women may be fleeing.\(^5\) Refugee women therefore begin the journey to rebuild their lives in Scotland facing significant disadvantage and are at severe risk of being impacted on negatively by welfare reform both as women and as refugee women specifically.

7. A specific and particularly worrying issue for refugees is the significant risk of destitution they face at several points in the UK asylum process\(^6\), including, and most relevant to this inquiry, upon being granted leave to remain. The main driver of this destitution is administrative delay and specifically the 28-day ‘move-on’ period following a grant of international protection after which, asylum support and accommodation provided by the Home Office is withdrawn. Securing a National Insurance Number (NINO) and bank account, applying for and receiving benefits payments, and finding a new home within a 28-day timeframe is extremely challenging, even without consideration of the language barriers, physical and mental health needs, childcare responsibilities, lack of knowledge of the system, and lack of means or support networks that many refugees must contend with.

8. The challenges of accessing benefits and support into employment are particularly acute for women, and have been explored by the Refugee Women’s Strategy Group in its report, *The Struggle to Contribute*.\(^7\)

9. Evidence from our Refugee Integration Services shows that refugees accessing our service last year waited on average 39 days for their first benefit payment following a grant of leave to remain.\(^8\) Bearing in mind that asylum support and accommodation is withdrawn after 28 days, the longest waiting time for receipt of mainstream benefits was two months, leaving a clear a gap in support in which men and women are left relying on emergency social work support if they have children, food banks, charities and other discretionary sources of food and shelter. It is important to note that the main reason why new refugees experience delays in benefits payment is the delay in being issued a NINO. In the case of couples who make a joint claim, women can experience longer waiting times for a NINO, which means that the household will live with a single person’s allowance. This creates a higher level of poverty, but also increases the dependency of refugee women on their partner. Of the three main benefits, Income Support and Employability Support Allowance take the longest to process and are mostly applied for by women. This delay is mostly due to the fact that these benefits require additional evidence and cannot be claimed online.\(^9\) Our service users also experience significant delays in receiving Child Tax Credits and Child Benefit. Our figures

---

\(^4\) Zimmerman, C et al (2009) *Asylum seeking women: violence and health*, Scottish Refugee Council & London School of Hygiene & Tropical Medicine

\(^5\) Querton, C (2012) *I feel like as a woman I’m not welcome: a gendered analysis of UK asylum law, policy and practice*, Asylum Aid

\(^6\) Gillespie, M (2012) *Trapped: destitution and asylum in Scotland*, Scottish Poverty Information Unit, Glasgow Caledonian University

\(^7\) Refugee Women’s Strategy Group (2011) *The Struggle to Contribute: A report identifying the barriers encountered by refugee women on their journey to employment in Scotland*

\(^8\) Scottish Refugee Council (2014) *Holistic Integration Service - Year 1 Evaluation Report*

\(^9\) DWP encourages online claims for JSA as it is the fastest and most efficient way to process the claim.
show that women wait on average 50 days for Child Benefit and 69 days for Child Tax Credits to be put in place.

10. We also work with family members joining refugees in Scotland through Refugee Family Reunion. Delays in the payment of benefits are also experienced by these families, which put significant pressure on families who have been through trauma, many of whom have been separated for some time. The process of obtaining a NINO and applying for benefits cannot begin until family members arrive in the UK. When receiving Job Seekers Allowance, Child Tax Credit and Child Benefit, although the applications are processed as a joint claim the funds are transferred through the – usually male - sponsor’s bank account. The refugee family reunion visa thus creates a worrying dependency on refugee sponsors and benefit payments further compound this. Women on refugee family reunion visas are reliant on their partner as sponsor for access to social security or other public funds, placing them in an extremely vulnerable position, particularly if they experience relationship breakdown or domestic abuse.

How has your clients’ experience with the benefit system changed in recent years since the introduction of the welfare reforms?

11. Our experience of delivering services to refugees and working with the Refugee Women’s Strategy Group has highlighted four particular areas of impact since the introduction of welfare reforms: an increased reliance on the Scottish Welfare Fund (SWF); negative impacts of sanctions; difficulties with digital access; and inflexibility in the implementation of the English Language Requirement.

12. Refugees in Scotland are increasingly reliant on payments by the SWF to plug the gaps in support resulting from administrative delays in benefits payments being put in place. Between July 2014 and March 2015 we secured 55 payments from the SWF for clients: 27 of these were made to female heads of household and 28 to men. Less than one third of our clients overall are female heads of household, indicating a worrying gendered dimension to refugees’ reliance on the SWF. Additionally, the average payment made to women was £216.73, compared to £108.00 to men, demonstrating a higher level of need and reliance on this discretionary payment for women than men. It is not acceptable that women with a recognised entitlement to benefits have to resort to discretionary ‘safety net’ payments to plug gaps in a broken system.

13. Another worrying trend is our clients’ experience of sanctions. We have data on a small sample of our clients who have been sanctioned; however, we believe this to be an underreported issue, as clients do not necessarily present to us for help when sanctioned, and when they do, in most cases they do not realise that the reason for their payments being stopped is that they had been sanctioned. Our data suggests that a higher proportion of women refugees may be sanctioned (29%) than the proportion of women among our clients claiming JSA (25%). The size of the sample does not allow us to draw conclusions, but the indication is that there may be a gendered dimension to sanctions among refugee JSA claimants. Where our clients are sanctioned, this most often occurs within the first six months of being granted leave to remain. This would suggest that people who are grappling with an unfamiliar and complex system are being penalised for their lack of awareness of the system rather than supported effectively to engage with it and start to rebuild their lives. The introduction of strict claimant commitments with the
lack of flexibility and room for individual need in the system is contributing to this failure to support people effectively into employment.

14. Refugees bring with them a wealth of language skills, experience and qualifications; however, a majority of our service users have limited English language skills at the point of being granted leave to remain, and many women in particular have limited, if any, formal work experience of the kind that is valued by employers in Scotland. 62% of our service users are ESOL Access Level 2 or below when they are granted leave to remain. 50% of adult women service users have never been formally employed before. Given this demographic, reduced access to Job Centres and reliance on digital access is particularly challenging for women refugees. Interpreters are rarely available for welfare-related appointments at Job Centre Plus, and are only provided where there is a recognised additional vulnerability. This also impacts significantly on our service, on which people increasingly rely for advocacy and support to complete benefits applications among other support.

15. The introduction of the English Language Requirement (ELR) has again highlighted a lack of flexibility in the welfare reform agenda, and a number of causes for concern. Although it is too soon to measure the real impact of the ELR, challenges have already been identified. For example, the DWP has contracted a single private provider (Ingeus) to deliver the mandatory provision under the ELR across the UK. In practice, this means that JSA recipients in Scotland already accessing ESOL or other college course provision have to withdraw from their courses to attend the mandatory DWP provision. The DWP provision is restricted to basic speaking and listening skills, incompatible with mainstream provision in Scotland and Scotland's newly refreshed holistic ESOL Strategy.\textsuperscript{10} We know that women in particular tend to prefer and get more out of community-based and flexible approaches to English language learning.\textsuperscript{11}

**What would be your priorities for change when certain benefits/elements of employment support are devolved to Scotland?**

16. Our priority for change upon devolution of further powers to Scotland would be for the action points on asylum agreed by the Smith Commission to be implemented. In particular, we believe that the executive devolution of asylum support, housing and advice to the Scottish Parliament would enable a system to be implemented that better meets the needs of refugee women, men and children at a local level, enabling us to work towards a gendered approach to the provision of end-to-end support which ends the unacceptable administrative delays and the 28-day ‘move-on’ period currently leaving refugees destitute at the point of being granted international protection.

**Do you have any suggestions of practical improvements that you would like to see when certain benefits/elements of employment support are under Scottish control?**

17. One example of a practical improvement we would like to see is a more flexible and tailored approach to supporting refugees - and refugee women in particular - into employment. We would recommend that Scottish employment support should

\textsuperscript{10} Education Scotland (2015) *Welcoming our learners: Scotland’s ESOL Strategy 2015-20*
\textsuperscript{11} Refugee Women’s Strategy Group (2011) *The Struggle to Contribute: A report identifying the barriers encountered by refugee women on their journey to employment in Scotland*
incorporate English language provision into a more tailored work programme package that is guided by Scotland’s ESOL Strategy, takes a holistic approach, and is informed by the needs and experiences of the people it is designed to support into employment. One example of how to do this is the Refugee Women’s Strategy Group and Glasgow ESOL Forum’s pilot programme, One Step Closer, which worked with refugee women to design and deliver a course that aimed to meet women’s learning needs and build their confidence, supporting them to develop the skills they identified as needing to be able to take steps towards employment.12

18. We would be happy to provide further information in relation to any of the points made above. For further information, please contact:

Nina Murray
Women’s Policy Development Officer
Scottish refugee Council
1 May 2015

12 Refugee Women’s Strategy Group & Glasgow ESOL Forum (2014) One Step closer: Confidence building and employability skills for refugee & asylum seeking women
Introduction

Scottish Women’s Aid welcomes the opportunity to contribute to the Scottish Parliament’s Welfare Reform Committee inquiry on Women and Welfare Reform. Our submission is informed by our member’s experiences of the devastating impact of welfare reform on the women and children they support.

“ A Widening Gap: Women and Welfare Reform,”¹³ a joint report produced by Engender, Scottish Refugee Council, Scottish Women’s Aid, Close the Gap and Scottish Council for Voluntary Organisations sets out the grossly disproportionate impact of welfare reform on women and demands a gendered response that takes into account the complexities of women’s lives. A response that strategically links interrelated policy areas such as women’s employment, health, housing, social care, childcare and violence against women. We believe that this inquiry provides an important opportunity for the Welfare Reform Committee to respond to this demand and ensure work on welfare reform is coherently connected to devolved areas of government policy that tackle gender inequality. We believe that analysis of budget processes on welfare is essential to achieving this and support Engenders call on the Committee to scrutinise the Scottish Government’s budget and policy processes around welfare reform to ensure that women’s equality, human rights and dignity are the driving principles of all government action on welfare issues.

Impact of changes to the benefits system on women and children who experience domestic abuse

Domestic abuse is both a cause and consequence of women’s inequality. This policy position has been supported by successive Scottish administrations since devolution, policy to address domestic abuse and other forms of violence against women cannot happen in isolation from broader work to tackle women’s inequality. This is embedded in Equally Safe¹⁴, the Scottish Government’s strategy on violence against women and girls which makes an explicit commitment to addressing gender inequality as a significant route towards preventing and eradicating violence against women and girls.

Women experiencing domestic abuse face considerable barriers when trying to leave an abusive partner, many women experience financial abuse and are denied access to independent income, are prevented from working and are encumbered with debt.¹⁵ Access to financial support, provided by the social security system is therefore crucial in supporting women to be able to leave an abuser. The cumulative impact of reforms to the welfare system have acted to further reduce women’s financial autonomy, resulting in increasing poverty and insecurity for women and their children and creating increased risk of women and their children remaining with or returning to the abuser.

Universal Credit, which replaces benefit payments paid separately to each member of a couple, with a single monthly payment to one claimant in the household will further increase the opportunity to create financial dependency. The devolution of some powers over welfare, particularly in relation to Universal Credit offers the...
Scottish Parliament the potential to better support women experiencing domestic abuse, by varying the single householder and monthly payment arrangements, which undermine women’s safety.\textsuperscript{16}

**Impact of specific changes and challenges**

**Process and delays**

Changes to both benefit entitlements and claims processes have severely affected women who have experienced domestic abuse, failing to take into account the impact of domestic abuse on women’s physical and mental health, confidence and self-esteem, need for safety, a place to live and responsibilities for childcare.

For women claiming benefits challenges exist across the system; these start from the inherent difficulties in making a claim as a result of the change to an online system. While ‘vulnerable’ claimants can make claims by phone – in practice they are discouraged from doing so. The complexity of the system results in delays and gaps in payments, this particularly impacts on women who have left an abusive partner and apply for benefit to be transferred to her name or when transitioning from one benefit to another. It takes on average 16 weeks for child benefit, to be transferred and can take up to 42 weeks for EU migrant women. This increases women and children’s poverty and a consequent reliance on food banks and the emergency destitution supplies and funds that Women’s Aid groups now operate.

“*Delays in claims being processed and sanctions are having a massive impact on women and their children, we are using food banks more regularly than we were previously and we have to subsidise living costs for more women than we were previously required to. In the last year we had to write off just under £3000 in loans provided to help women buy essentials and in unpaid electricity/gas costs as women did not have access to funds.*”

Ross-shire Women’s Aid

**EU migrants**

Restrictions to entitlement to benefit for EU migrants are having a devastating effect on women when separating from an abusive partner. EU migrants have to have a “right to reside” to be able to claim means tested benefits. Women whose only right to reside is as a Jobseeker can only claim JSA for restricted periods unless they can demonstrate a genuine prospect of work and since 2014 women whose only right to reside is as a jobseeker cannot claim housing benefit. Lack of entitlement to housing benefit also means that women in this situation cannot access refuge accommodation, as refuges are reliant on housing benefit to cover rental costs. EU migrant women in this situation are therefore not able to get financial support in order to leave an abusive partner or be able to access the safety of refuge.

“*Many women using our service are no longer entitled to housing benefit, whereas they would have been previously. In addition many have had their eligibility to benefits stopped- in the case of income support or ESA, or time limited (JSA). This has meant that nine women presently using our Bilingual support service have been directly affected by these reforms. One woman has already had her benefits stopped and is about to be evicted from her home due to not being eligible for housing benefit. Another woman, who has two children, is also facing eviction proceedings in the near*”

\textsuperscript{16} Ibid
future.”  
Perthshire Women’s Aid

Employment Support Allowance (ESA) and Personal Independence Payments (PIP)

Assessments for ESA and PIP cause increased stress and anxiety and exacerbate women’s pre-existing health problems. These assessments focus on women’s ability to complete physical tasks and fail to take into account the impact of domestic abuse on her mental health. Women who have had to move address to leave an abusive partner and register with a new GP are often unable to provide sufficient evidence to support their application. As a result applications are often unsuccessful and women require advocacy and support to make an appeal.

Recent tightening of the eligibility criteria for ESA also discriminates against women with mental health issues. The Directors of Public Health in Scotland have criticised the new screening system for ESA claimants on the basis that it places additional requirements on women to prove their exceptional level of need, and may put women at risk of self-harm and suicide. 18

“I am experiencing trauma, severe depression and anxiety as well as physical conditions I first claimed ESA in 2010, this took almost 15 months to be processed, at this point I was put onto the work related rate until the DWP decided to call me in for another ATOS examination their report stated completely the opposite to what the reality of my condition is. This decision has placed me in an intolerable social and financial situation and only adds to the mass financial difficulties and shortage of income I currently have. Unlike before, the rules now do not allow me to continue to claim even the basic level of ESA, whilst I await an appeal date. I have had to claim JSA of just £71.70 per week instead of the ESA work related amount of £100.15 a shortfall of £28.45, this has severely impacted on me”

Ross-shire Women’s Aid

Jobseeker’s Allowance and sanctions

The impact of domestic abuse on women’s ability to fulfil job seeking conditions was recognised with the introduction of the Jobseeker’s Allowance Domestic Violence Easement (JSA DV easement). This exempts some victims of domestic abuse from job seeking conditions for up to 13 weeks. However women are not routinely informed about the easement despite recommendations made in the DWP’s own research. In our survey of Women’s Aid workers carried out in June 2014 we found that Jobcentre staff had very little knowledge of the JSA DV easement. Women’s Aid workers reported that women were informed about the easement by Jobcentre staff in only 15% of the cases they dealt with. This results in women being sanctioned as they are unable to fulfil job-seeking activities.

“Last week I supported a woman to make an application for JSA DV Easement over the phone to the DWP, after holding for 30 minutes I was told by the advisor that she didn’t know about any DV Easement, she went to check with her Supervisor, who also didn’t know about it and told me I would have to phone another number as they

18 Changes to ESA will discriminate against women – statement from Scottish Directors of Public Health, March 2015
Glasgow East Women’s Aid

Women’s Aid groups report that the women they support are sanctioned as they are unable to fulfil job seeking requirements because of the impact of domestic abuse on their health, where is no available childcare, when their children are sick or where they have language or literacy difficulties.

“A woman we are supporting whose first language is not English was to be sanctioned as the Job Centre Plus felt she was not recording her job search to their satisfaction. We advised the Jobcentre that she was searching but struggled to record the information in a format that met their requirements. If this woman did not have support, she would have been sanctioned.”

Dumbarton Women’s Aid

Scottish Welfare Fund

Women and their children who have had to move from their home as a result of domestic abuse are reliant on the Scottish Welfare Fund (SWF) to be able to refurnish a new home. While some of our members report that the SWF has improved how women access community care grants, with less intrusive information required and applications processed more quickly. In many areas our members report that the administration and assessment process of the SWF is challenging for the women they support. Some local authorities require applications to be made online and are reluctant to accept telephone or written applications. Most local authorities provide goods and vouchers, rather than cash payments, removing women’s choice in how they furnish their new home and instead are given “institutional furniture”. Assessment decisions are often inconsistent and judgemental, with women without children or whose children currently do not live permanently with her, ‘allowed’ only a single bed, a single chair and carpeting for one room, which women have described as humiliating.

Delays in processing community care grants (CCG) combined with lengthy waits for deliveries of furniture cause difficulties with housing benefit claims. This results in women starting tenancies with rent arrears. As a CCG will not be processed until a tenancy agreement has been signed, but women are unable to move into a tenancy with no furniture and housing benefit will not be paid until she is residing in the property.

Housing benefit – the bedroom tax and shortage of one bedroom properties means women have to stay much longer in a refuge. While some local authorities will use Discretionary Housing Benefit (DHP) to cover the cost of an additional bedroom for women leaving refuge, others don’t and the continual re-application process also causes uncertainty and additional anxiety rather than the security and stability that women need at that time.

“Ms E had been in a Women’s Aid refuge for 26 months waiting to be rehoused. As a single woman she needed a one bedroom flat and only two bedroom properties were available. Eventually she had to accept the offer of a two bedroom property and was informed by the housing officer that she would be liable for the bedroom tax. She applied for and received DHP but has to re-apply every 3 months and has been told that she may or may not continue to receive it. As a result Ms E continues to feel
insecure and anxious and this does not provide any real kind of basis for her to be able to rebuild her life.”
Glasgow East Women’s Aid

Impact on services
Welfare reform has had a major impact on Women’s Aids already overstretched and under-resourced services.\textsuperscript{20} The increased complexity and difficulties of the benefits system, incorrect decisions, the need for online or phone applications, increase in applications for reinstatement and appeals, place more demand on services to support women to navigate and challenge the system. Ensuring women and children’s basic needs for food, clothing, rent and heat and light are met takes increasing precedence over dealing with their emotional support needs. Measures to mitigate the impact of welfare reform on women need to ensure that gender sensitive services are properly resourced to respond to this demand.

Recommendations
Primary responsibility for welfare reform lies with the UK Government, but there are specific actions that the Scottish Government can take to mitigate the impact on women and reduce the risk of further harm. These are set out in our joint report, ‘A Widening Gap’, and noted below.

Recommendations to the Scottish Government
1. Develop a clear action plan to mitigate the impacts of welfare reforms on women, which is linked to devolved policy on gender equality, women’s employment, social care and childcare.

2. Specifically monitor emerging impacts on rural, disabled, older, migrant, refugee and BME women, lone mothers and unpaid carers.


4. Ensure the Scottish Welfare Fund respects women’s choices and dignity and hold local authorities accountable for delivery of such an approach.

5. Ring-fence funding for community-based women’s organisations to provide gender sensitive services relating to welfare reform, as part of a broad shift to strategically link the Equality Budget Statement and the Draft Budget.

6. Invest in employability services for women forced into or out of the labour market as a result of welfare reform, including tailored services for groups such as refugee and disabled women, unpaid carers and former carers.

7. Hold local authorities accountable over the delivery of Discretionary Housing Payments to ensure consistent access to safe accommodation for women.

8. Extend the Domestic Violence Rule to all women subject to immigration controls to ensure EU migrants who have been subject to domestic abuse are able to apply for a Destitution Domestic Violence Concession (DDV).

9. Introduce measures to guarantee that women with insecure immigration status have access to safety and protection where a relationship in which their immigration status is dependent on their partner breaks down.

\textsuperscript{20} Scottish Women’s Aid (2014) Measuring the impact of Funding cuts on domestic services for women and children in Scotland
10. Provide funding to ensure women are able to access refuge accommodation regardless of their entitlement to housing benefit.

**Devolution of powers over welfare**

11. Embed gender and human rights analysis throughout the process of further devolution, including through the work of the Joint Ministerial Working Group on Welfare or successor body.

12. Improve the quality of equality impact assessments and ensure that they are not post hoc, but shape design of any new legislation and programmes.

13. Consult different groups of women who have been impacted by welfare reforms throughout the design of any new legislation and delivery systems.

14. Hold the UK Government accountable to the Smith Commission Agreement and deliver a Scotland Act that provides for maximum flexibility on employment support and the creation of new benefits.

15. Push for the rollout of Universal Credit and Personal Independence Payment to be halted in Scotland, until the current process of devolution is complete.

16. Push for devolution of administrative powers over Universal Credit to be taken out of primary legislation and expedited to the Scottish Parliament.

17. Use the power to create new benefits to reinstate lost entitlements for carers and parents.

18. Implement the Smith Agreement commitment to consider the devolution of asylum support, advice and housing to the Scottish Parliament, and in so doing, end administrative delays that leave refugee women destitute.

19. Innovate with newly devolved work programmes to support the needs of women seeking work and diverge from existing employability models that replicate gender segregation in the labour market.

20. Use new powers over employment support and benefits to mitigate some of the worst impacts of conditionality, sanctions and services delivered by Jobcentre Plus, where possible.

21. Link new powers over benefits for disabled people and carers to carers legislation and strategy, and review how devolved services impact on women’s equality before new powers are taken forward.

22. Use the opportunity offered by the devolution of new powers to reimagine the services needed to better support the groups that they serve.

**Scottish Women’s Aid**

Scottish Women's Aid (SWA) is the lead organisation in Scotland working towards the prevention of domestic abuse and plays a vital role in campaigning and lobbying for effective responses to domestic abuse. SWA is the umbrella organisation for 37 local Women's Aid organisations across Scotland; they provide practical and emotional support to women, children and young people who experience domestic abuse. The services offered by our members include crisis intervention, advocacy, counselling, outreach and follow-on support and temporary refuge accommodation.

Jo Ozga
Policy Worker