



Call for views on the Social Security (Scotland) Bill

Submission by Glasgow Homelessness Network (GHN)

GHN is delighted to make the following submission to the to the Scottish Parliament's Social Security Committee on Social Security in Scotland. We would be happy for further involvement or to supply further information as required.

For more information on this response, please contact:

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We want everyone to have a safe and secure home.

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1. Introduction

- 1.1 Glasgow Homelessness Network is an umbrella organisation with a unique role to evidence and advance solutions to homelessness and connect the insights of people who both work and live with the issue. Our home is Glasgow, with national and European programmes.
- 1.2 We are pleased to provide this written response to the call for views on the Social Security (Scotland) Bill by the Scottish Parliament's Social Security Committee.
- 1.3 This response is informed by the learning from our relevant programmes of work in Glasgow and across Scotland. We also facilitated workshops to directly consult with frontline homelessness organisations and people with lived experience of homelessness.

2. Summary of Responses

We believe the practical application of the founding principles is an important next step as the new social security system is developed.

We welcome a human rights based approach; for the approach to be effective, a common understanding of human rights for all community members and professionals must be established.

We have a particular interest in ensuring people are given the social security they are eligible for and how this can work in practice.

We believe the several stages of application and appeal can lead to people not receiving adequate social security that they would require to live, and the effects are multiplied for people who experience multiple and complex needs.

3. Principles Underpinning the New System

- 3.1 People who we consulted with, who are both living and working with homelessness in Glasgow, are supportive of the proposed set of aspirational principles that acknowledge the importance of both the practical running of a new system that can respond quickly and efficiently and the impact that interactions with the system can have, particularly on vulnerable people. Achieving consensus on the practical application of these principles and developing a common set of expectations of what they will look like on the ground is an important next step as the new social security system is developed.
- 3.2 Embedding the new social security system within an explicit human rights framework is a particularly welcome progression and the Scottish Human Rights Commission and Scotland's National Action Plan for Human Rights have an important role to play in supporting this. However, we would also note that while the language of human rights and the associated entitlements is well understood at a professional level, the truly universal nature of the rights is not always fully appreciated at an

individual level with the expression of a not uncommon view that human rights apply to people living in other parts of the world and do not apply to people of Scotland. A test of the human rights approach truly underpinning the new social security system will be when people in Scotland recognise their own human right to social security and are able to access it.

3.3 There is particular interest in the principle of the Scottish Government's role in ensuring that people are given the social security they are eligible for and the different things this could mean in practice. People living and working with homelessness considered this principle on a number of different levels:

- Wider advertising campaigns to advise people of entitlements;
- Funding and coordination of high quality advice and information accessible across the country; and
- An inbuilt approach to ensuring automatic entitlement where possible, cutting out applications process leading to low uptake.

Traditionally the focus has been on the first two options to ensure people can access information on their benefit entitlement, but despite this we still see large numbers of people – often the most vulnerable and disadvantaged – not accessing the advice and in turn not receiving their entitlement.

The development of a brand new system for the administration of social security provides a particular opportunity to build in from day one a streamlined approach that, where possible, pays people their entitlement without a separate application process.

For example, through the work of the Poverty Leadership Panel in Glasgow changes were made to the administration of the School Clothing Grant to ensure all eligible households received the payment into their bank account automatically, bypassing the normal application process. This was possible because the entitlement to the Grant was based the receipt of other benefits and Glasgow City Council had all of the information required in order to identify entitlement and make automatic payments. This has increased uptake for low income families who were previously not applying and saved the local authority time and money by removing a bureaucratic application process.

While this is not possible with all benefits as many require a full assessment to ensure a tailored approach, and there will be numerous other examples across the rest of Scotland, the Scottish Government is in the unique position to be able to embed such approaches immediately to fulfil the principle of ensuring the people are given the social security they are eligible for.

3.4 On the principle of ensuring efficiency and value for money, people living and working with homelessness agreed with the importance but noted the value in considering related public sector costs when calculating value for money and efficiency. Vulnerable people having access to the money they need at the point they need it has an important role to play in ensuring their wellbeing and helping to avoid other crises which can have emergency costs for other parts of the public sector.

3.5 The commitment of the Scottish Government to involve the people of Scotland in the design of the social security system has been a very positive element of the approach taken to date and its continuation is welcomed. Ensuring that people with lived experience are a central part of any independent review mechanism will help ensure confidence in the new system.

4. Social Security Charter

- 4.1 There is support for the development of a social security charter as a means to ensure that the aspirational principles are realised in practice, creating a level of accountability.
- 4.2 A similar charter exists for social housing tenants and people experiencing homelessness which promotes the publication of evidence highlighting progress towards a shared set of agreed goals, identifying areas of success and areas for improvement. While it has been in existence for a number of years it is worth noting that the awareness of the Scottish Social Housing Charter has not yet spread beyond those with immediate responsibility for reporting and delivery. People living and working with homelessness in different sectors still have minimum awareness of the existence of the charter and do not yet view it as a source of public information on progress towards outcomes.
- 4.3 So while a similar model can be adopted for the development of a Social Security Charter it is worth noting at this early stage the longer time periods required before people begin to see it as an accountable source of information.

5. Rules for Social Security

- 5.1 The proposed rules for social security focusing on the challenging of decisions were particularly important to people living and working with homelessness. At present people report difficulties accessing speedy decisions on mandatory reconsiderations, and even the use of the terminology can prove problematic through the expectation that people in receipt of social security become familiar with procedural language in order to access their entitlements.
- 5.2 Particularly for people experience multiple and complex needs, the several stages of application and appeal can lead to people not receiving adequate social security that they would require to live. Minimising changes to payments and applications through the appeals process would minimise disruption to people, and reduce the requirements on other organisations to respond to crisis situations.
- 5.3 Additionally, the provision of information to support claims for disability benefits remains a concern for many people. At this early stage of development people living and working with homelessness are interested in the question of weight given to different types of evidence to support claims. For example, evidence from carers and other supports in people's lives can supplement the medical evidence provided by GP's to ensure that an assessor has a full picture of the realities of someone's day-to-day life. At present there is concern that the evidence of those fulfilling less formal care roles is seen as less valuable. A fuller debate on the range of evidence that will be considered and the weight it is given would be an important step in ensuring that people receive the disability benefits they are entitled to at the correct level.

6. Discretionary Housing Payments

- 6.1 Discretionary Housing Payments play an important role and people living and working with homelessness note that the current approach largely works well. One point worth considering at an early stage is whether, allowing for the discretionary nature of the payments, the award can be made on the understanding that a sustainable housing solution may not be immediately available and that reviews of the award are only carried out when there has been an actual change in circumstances.

Consultation on the Social Security (Scotland) Bill, submission by GHN.

Such an approach would provide additional security for people who are vulnerably housed, supporting an environment where people can find housing that meets their needs rather than feeling under pressure to take the first available offer to ensure they can continue to receive DHP in the short term.

This response addresses the consultation questions that GHN and participants felt were most relevant to homelessness, adopting an appreciative inquiry approach.