

CALL FOR EVIDENCE RESPONSE FORM

SOCIAL SECURITY COMMITTEE

SOCIAL SECURITY (SCOTLAND) BILL

SUBMISSION FROM NHS Greater Glasgow and Clyde

Control of a number of existing social security benefits is being passed from the UK Government to the Scottish Government. The Parliament would like your views on the Scottish Government's plans before they become law. The Social Security Bill is the proposed law.

1. The Bill aims to provide a framework for the creation of the Scottish social security system. In addition the Scottish Government has chosen to put most of the rules about the new benefits in Regulations. It believes that putting the rules in Regulations will make things clearer and less confusing. Parliament cannot change Regulations, only approve or reject them. The Scottish Government intends to develop Regulations with external help.

Q. Do you have any views on this approach?

2. The Bill proposes that the Scottish social security system will be based on the following seven principles:

- Social security is an investment in the people of Scotland.
- Social security is a human right. It is essential to accessing other human rights.
- Respect for the dignity of individuals is at the heart of the Scottish social security system.
- The Scottish Government has a role in making sure that people are given the social security assistance they are eligible for.
- The Scottish social security system will be designed with the people of Scotland, and based on evidence.
- The Scottish social security system should always be trying to improve. Any changes should put the needs of those who require social security first.
- The Scottish social security system is efficient and delivers value for money.

Q. What are your views on these principles and this approach? Please explain the reason for your answer.

We agree fully with these principles. We know that absolute and relative poverty is associated with a range of adverse outcomes costly in the longer term not only for the individual affected but society as a whole. In particular the rights of disabled

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people to live independently and with dignity are underpinned by a social protection system which follows these seven principles. Many other groups who experience poverty will welcome this approach, for example single parents. Designing the system on evidence is also welcomed and the voices of people living in poverty can also contribute to this.

Q. Are there other principles you would like to see included?

3. The Bill proposes that there will be a publicly available social security 'charter'. This will say how the Scottish Government will put the seven principles above into practice. It will also say what is expected from people claiming benefits. A report on the charter will be produced by the Scottish Government each year.

Q. Do you agree with the idea of the charter? Please explain the reason for your answer.

We agree that it would be good to clearly and transparently describe and monitor the specific actions undertaken to uphold these principles. Care will be required to ensure that articulation of responsibilities of recipients which accompany their right to social security is non-judgemental and non-demeaning in tone.

Q. Is there anything specific you would like to see in this charter?

Commitment to ongoing assessment of the adequacy of benefit payment rates with transparency in this assessment process and rationale for decisions.

Ongoing monitoring of access barriers and measures taken to ensure ease of access.

4. The Bill proposes rules for social security which say:

- how decisions are made and when they can be changed
- how to apply and what information people have to provide
- how decisions can be challenged
- when overpayments must be repaid
- what criminal offences will be created relating to benefits.

Q. Do you have any comments on these rules?

These rules are important for the social security system, however they do not address how delays or underpayments by the agency are monitored, challenged or improved. Child Poverty Action Group's early warning system has identified

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administrative errors as a significant cause of underpayments and financial hardship for people relying on benefits.

5. The Scottish Government will take over responsibility for some current benefits. The Bill does not explain how they will work in detail. This will be set out in Regulations at a later date. The current benefits which will be run by the Scottish Government are:

- disability assistance (including disability living allowance, personal independence payment, attendance allowance and severe disablement allowance)
- carer's allowance
- winter fuel payments
- industrial injuries disablement benefit
- cold weather payments
- funeral payments
- sure start maternity grants

Q. What are your thoughts on the schedules in the bill in regard to these benefits?

It is great that maternity grants are included and that we therefore have an opportunity to improve the provision of this benefit. We understand that welfare food provision is also now devolved which also presents an opportunity for improvement.

We know that young families are particularly vulnerable both to the causes and impact of poverty with the antecedents of premature mortality and reduced healthy life expectancy and human potential laid in the first years of life. We must therefore do everything we can to protect young children and families from poverty.

Glasgow City Council has explored automatic payment of benefits and have successfully implemented this approach for school clothing grants by identifying eligible families. There is potential to use this approach for maternity grants and other child and family benefits - see Q. 10 for more detail.

6. The Bill proposes that a new type of short-term assistance will be introduced. This will be for someone who is challenging a decision to stop or reduce a Scottish benefit.

Q. What are your views on this proposal?

We agree with this proposal. We understand that appeal success rates are high and that benefit sanctions in particular are resulting in destitution for some.

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As per Q. 4 this short term assistance could also cover hardship caused by delays or administrative errors.

7. The Bill includes the power for the Scottish Government to be able to top up 'reserved' benefits (ones controlled by the UK Government), but does not say how these will be used. The Scottish Government also has the power to create new benefits. This is not included in the bill.

Q. Do you agree with these proposals?

Yes – where opportunity costs allow we should do everything in our power to mitigate the impact of welfare reform given the impact of material deprivation on health.

Child Poverty Action Group has a current campaign in Scotland to increase the value of child benefit by £5 a week which they estimate would reduce child poverty by 14%. I would be wholly supportive of prioritising this investment particularly if linked to a progressive tax increase to fund.

The recent withdrawal of child tax credits for third children will also have a very negative effect on the health and longer term outcomes of children and families. This could be considered under top-up powers as a way of ameliorating child and family poverty.

8. The Bill proposes that carer's allowance should be increased as soon as possible to the level of jobseeker's allowance (from £62.10 to £73.10 a week).

Q. What are your thoughts on this proposal?

It is positive that carers allowance is being increased. However this amount is still likely to be inadequate for maintenance of a healthy life and significantly undervalue the contribution of carers to society

9. The Bill proposes that discretionary housing payments continue as they are. They will still be paid by local authorities. The Bill does not require any local authority to have a discretionary housing payments scheme but if they do, they must follow Scottish Government guidance on running it.

Q. Do you agree that discretionary housing payments should continue largely as they are?

I would be concerned that under the above description there may be an inequality in access to this benefit – if some local authorities choose not to have such a scheme.

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Q. Do you have any other views on the proposals for discretionary housing payments?

10.Q. Is there anything else you want to tell us about this Bill?

We are particularly keen to comment on the opportunity the newly devolved powers present to improve Sure Start (SSMG) and Healthy Start (HS) benefits.

We agree with the recent recommendations made by the Child Poverty Action Group for improving these benefits namely:

- *SSMG should also be given on birth of second and subsequent children*
- *The value of both benefits should be uprated to keep pace with inflation as measured by the retail price index.*
- *Eligibility of both benefits should be aligned – e.g.SSMG should be extended to all parents under the age of 18 years*
- *Eligibility for both benefits should be extended to include low income families in work – e.g. by including working tax credits, housing or council tax benefit receipt in the eligibility criteria*
- *Low income parents in full-time education should also be eligible.*
- *One application process for both benefits*
- *A free helpline phone number*
- *There should be universal access to appropriate vitamins for all women planning pregnancy, during pregnancy and for children up to age 5 years.*
- *The provision of HS should continue until a child's 5th birthday*
- *The provision of a HS smart card which can be used online and/or at self-service checkouts if possible*
- *There should be consideration and consultation on whether HS vouchers should be replaced by a cash benefit*
- *Efforts should be made to increase the number of retailers accepting the vouchers through incentivising participation and simplifying registration and redemption processes.*
- *The provision (and where possible colocation in universal anchor services) of income maximisation services for pregnant women and infants should be strengthened to ensure a formal “financial pathway” which staff providing universal services to these populations can easily refer.*
- *Automation of payment of these benefits where possible.*

Automation of payment may be easier once the child is born if in receipt of child benefit. During pregnancy we should look at whether it might be possible for IT systems in maternity services to interface with social security systems to alert of

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pregnancy – e.g. BadgerNet system provided by Clevermed is now used by maternity services in a number of health boards. Automatic notification in pregnancy would also allow online completion of application and obviate need for health professional confirmation of pregnancy.

In the interim important to ensure printed copies of the application in common languages are available through common access points – such as Registrar of Births, community pharmacies, nurseries, in addition to midwifery and health visiting services. Enabling more staff to confirm pregnancy may also improve access – e.g. financial inclusion staff based in maternity sites.

In NHSGGC we have used the Healthy Wealthier Children approach to ensure that referral pathways are in place for midwives and health visitors to refer parents for financial inclusion advice. This ensures that all the benefits the family are entitled to are assessed. This approach is being explored across Scotland and Health Scotland are leading on this work.