



The Church of Scotland

Church and Society Council

Official Response

SUBJECT: Consultation on Social Security in Scotland
REQUESTED BY: Social Security Committee of the Scottish Parliament
REFERENCE: OR-2017/11
DATE: 23 August 2017
SUBMITTED BY: Irene MacKinnon on behalf of the Church and Society Council
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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?

We welcome the fact that this approach allows for a more flexible and responsive system, and would hope that this enables the system to be regularly updated in the light of feedback from those with lived experience of needing the support of the social security system.

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.

In 2014, the General Assembly of the Church of Scotland affirmed that the primary aim of the welfare system is to enhance human dignity for all, so that every citizen may live life in all its

fullness, and urge all consideration of welfare policy to be characterised by the principles of fairness and compassion.¹

The General Assembly further recognised the importance of involving people who are affected most by the decisions made in the planning and implementation of welfare policies.²

The Church wholeheartedly supports the proposed principle that the Scottish Social Security system will be designed with the people of Scotland. The Church supports the Poverty Truth Commission's stance that 'nothing about us without us is for us.'

It also welcomes the principle that Social Security is an investment in the social, cultural and economic wellbeing of the people of Scotland, with respect for the dignity of individuals at the heart of the system.

The Church would also like to reiterate its call in its October 2016 response that it actively reaches out to groups who are excluded or on the margins of current benefit system. This could include those who have lost benefits due to changes in the system, and those who are unable to access social security for reasons such as illiteracy or homelessness.

The Church would hope that the 'Experience Groups' are reflective of the changing face of poverty in Scotland – with working people living on low incomes due to few hours and/or low pay being included alongside those who need support from the benefit system because they are unable to work.

The Church of Scotland welcomes the government's emphasis on dignity and respect being core to its approach in shaping a distinctly Scottish Social Security system.

A common process for all types of assistance that is simpler and easier to navigate would also be welcomed, and the Church would ask that this integrates the support available from all tiers of Government down to individual local authorities.

The Church of Scotland welcomes this principles based approach and it is keen to see that the new system would be regularly and transparently judged against these principles.

The Church welcomes commitment to using evidence to design and improve the system. We would want that evidence to be broader and richer than just economic and labour market indicators, but to pay close attention to qualitative and quantitative measures of hardship and the lived experience of poverty in Scotland.

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

The Scottish Social Security System should seek to be as simple and easy to understand as possible and appropriate support should be available to those who need it.

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.

¹ 2014 Church and Society Council deliverance, Church of Scotland

² 2014 Church and Society Council deliverance, Church of Scotland

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

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

In the response made to the proposed Social Security legislation by the Church of Scotland in October 2016, the Church supported the Poverty Truth Commission in its stance on desiring a Claimant Charter, and in addition - writing principles into legislation. The Scottish Government has agreed to pursue both of these options, and the Church welcomes this.

The Claimant Charter should include the right to have the choice of informal support of an advocacy worker at any medical assessment and without undue delay e.g. a three month deferral of advocacy representation for an Appeal would not be acceptable. The right to advice and information **before** eligibility assessments and the right to independent advocacy and support **during** eligibility assessments should be enshrined in the Charter. Regulations should also stipulate that any person carrying out an assessment to determine someone's eligibility to receive a health/disability related benefit is appropriately trained and is in receipt of all the relevant information, provided by professionals who are registered with their respective professional bodies.

It should also include the pledge that existing benefit must be paid while an Appeal is underway. Also it should acknowledge that if an Appeal of a consideration of change of benefit is unsuccessful, there will be no payback liable on the part of the claimant of any benefit paid during the Appeal process.

The Charter should be prominently visible in all Social Security Agency premises, and easily accessible on the Agency website. The Charter should be rights based, it should offer choice, and it should embed advocacy and support within its structure.

As mentioned before, the Scottish Government has agreed that people who use or may use social security services should be involved in the process of creating the charter, and this is a position strongly supported by the Church. It also welcomes the provision that Scottish Ministers would be required to prepare and publish a charter no more than six months after the Bill has come into force, and to review it every five years by each new and subsequent Scottish Parliament.

Clear timescales should be put in place and adhered to by those who sign up to the Charter. The consequences of not meeting these timescales should also be explained. There is some concern that the Bill notes obligations regarding people using the system but insufficient weight has been given to the State's obligations to claimants, and the consequences if Government staff do not comply with their obligations. The obligations of both the state and claimants should be made explicit within the Charter.

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?

The Bill should also provide timescales for decision making and appeals processes, and ensure that interim support is available to families should those timescales be missed for any reason.

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?

Disability Assistance

The Church of Scotland believes that access to disability assistance should not be limited by a system that is not accessible to those who are at a disadvantage due to technology, reading, understanding or a lack of skill. The Church believes that individuals should be able to choose a form of communication that suits them best.

With respect to lowering costs for disabled people and carers, such as spending some of their award on other services e.g. discounted energy tariffs, it is important that this approach would be voluntary in order to preserve the individual's dignity. Otherwise, a system could be created where further stigma is generated.

The Church also recognises the importance and added value of initiatives such as the Motability scheme which provide a service that would be impossible to afford individually.

However, the Scottish Government should work with user groups to develop a fairer process than the current PIP assessment. The assessment process should be open and transparent. People should be encouraged to be accompanied by carers or advocates so that they are able to provide as complete a picture as possible about their medical conditions is put forward.

The assessments should be able to recommend awards for variable lengths of time up-to and including whole life, if the medical evidence warrants it.

In addition, the Church supports the view of the Poverty Truth Commission that 'disability assistance' must be further defined within Regulations, so that it is clear that people who do not have a physical disability, but have other conditions such as neurological or anxiety conditions, or developmental disabilities such as Autism are also included.

Carer's Allowance

The Church of Scotland welcomes the Scottish Government proposal to increase Carer's Allowance to the level of Jobseeker's Allowance, and to improve access to help and advice for the carer. However the regulations should stipulate that Carer's Allowance being paid at the Jobseeker's

Allowance rate will have no material effect on other benefits such as Employment and Support Allowance.

The Church is also interested in the Scottish Government's longer term proposal to develop a Scottish Carers' Benefit that would provide financial support for those who choose to, or who have had to give up or limit their employment or study due to caring responsibilities.

The Church is also glad to note the Scottish Government's desire to recognise the important role that carers have in society. However the Church recognises that support for carers is not solely about money and is also highly dependent on peer and other forms of support.

The Church also welcomes the idea of a Young Carers Allowance to provide extra support for young people, but there remains the crucial need for peer support and respite care, and this must be recognised by the system.

Winter Fuel and Cold Weather Payments

The 2016 General Assembly of the Church of Scotland called on Ofgem and the Scottish and UK Governments to address unfairness in domestic energy pricing. The Church also called on the Scottish and UK Governments to remove unnecessary barriers to Community Energy schemes.

The Church also called on energy companies to do more to protect vulnerable customers, and to publish debt and disconnection figures by postcode area. Regret was expressed that the Scottish Government failed in its commitment to eliminate Fuel Poverty by November 2016, and the Church has called for this to be addressed as a matter of urgency, with a new timetable for elimination put in place.

The Church of Scotland believes that if there was an effective strategy in place to eradicate fuel poverty, by improving the housing stock and providing affordable warmth, such as that proposed by the Existing Homes Alliance³ (of which the Church of Scotland is a member), this would help to alleviate some of the issues social security has to address.

The Church of Scotland has contributed through a stakeholder workshop to the work of the Fuel Poverty Definition Review Panel and we await the final outcome with interest.

The Church supports the recommendations of the Poverty Truth Commission that the regulations should clarify that Cold Heating assistance will be paid to all eligible families that are in receipt of Child Benefit (irrespective of whether the child/children are under or over five years of age.)

Winter Heating assistance should be paid as per need assessed under set eligibility criteria, rather than being determined solely by age, rather than the current system which gives assistance to all adults above a certain age only.

Best Start Grant

Although the Best Start Grant aims to reduce inequalities and close the attainment gap as part of an early years support initiative, it is important to recognise that the costliest time for parents can be when their children become teenagers.

³ The Existing Homes Alliance Scotland is a coalition of housing, environmental, fuel poverty and industry organisations calling for urgent action to transform Scotland's existing housing stock and make it fit for the 21st century.

Younger children's clothes can be a lot cheaper than those for older children, and smaller children are not necessarily so susceptible to ridicule from their peers as they are later in life. This has been highlighted by young people in the Poverty Truth Commission and Kinship Carers.

Because of this, the Independent Short Life Working Group on Food Poverty report, 'Dignity: Ending Hunger Together in Scotland', chaired by Rev Dr Martin Johnstone, secretary of the Church of Scotland's Church and Society Council, called for a significant increase in Child Benefit.⁴

The Church of Scotland has also signed up to support the Give Me Five: The Child Benefit Top-Up campaign which will be launched on August 30 and led by a coalition of third sector, civil society and faith groups. The campaign calls for an additional £5 per week paid by the Scottish Government for every child in Scotland – to top-up Child Benefit – helping to support families on low incomes, and lift children out of poverty. It has been calculated that topping up Child Benefit by just £5 a week could lift 30,000 children out of poverty in Scotland.

This commitment would demonstrate the Scottish Government's ambition to take a preventative and long-term approach to reducing poverty among children, and ultimately in adults.

Funeral Expense Assistance

The Church of Scotland is a member of the Scottish Funeral Poverty Working Group, the Funeral Poverty Alliance and the Scottish Government Working Group on Funeral Poverty and Social Security Funeral Payment.

Both groups would like the funeral grant raised so that it covers the cost of a basic funeral, a Government plan to tackle rising funeral costs, an obligation on funeral directors to provide a basic funeral with a clear, visible price, moving the eligibility of payments to the deceased to speed up the process, and for this to be connected to the deceased's normal place of residence rather than to the family.

The Church of Scotland would also be in favour of a fixed grant to cover funeral expenses, on the basis that the amount was sufficient to cover the costs incurred.

The Church of Scotland welcomes the commitment from the Scottish Government to engage with experts and relevant organisations when drawing up the regulations for this benefit. The Church also welcomes the Scottish Government aim to process applications for the new benefit within 10 working days of receiving a completed application and make payments as soon as practicable thereafter.

For the past four years, the Church of Scotland has committed time and resources to the issue of funeral poverty, and at its 2016 General Assembly, the Church reaffirmed its unique position that no parish minister should charge a fee for conducting a funeral.

In August 2017, Rev Dr Martin Johnstone, secretary of the Church of Scotland's Church and Society Council welcomed the 10 point plan set out by the Scottish Government to tackle funeral poverty. But he also renewed the Church's plea to both national governments to ensure that the funding available allows those who are experiencing funeral poverty to receive support that is sufficient enough to make a real difference.

⁴ <http://www.gov.scot/Resource/0050/00502395.pdf> Accessed 20 October 2016

He further called on the Scottish Government to make a determined effort to ensure the postcode lottery of burial and cremation charges is brought to an end, and that charges are set at a level that does not cripple those experiencing poverty at such a difficult time in their life.

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?

Across Scotland, people who have been refused benefits often require emergency support from churches and charities. These people often do not pursue the appeals process as the urgency of the immediate needs of their family means they simply do not have the time or the energy. Therefore the short-term assistance would be welcomed, and in particular the stipulation that where a redetermination or Appeal is in process, “that during that period the person suffers no loss of income.”

However the Church supports the view of the Poverty Truth Commission that the Regulations should make clear that no loss of income is matched by a commitment that there will be no loss of a Motability Vehicle or other non-financial benefit, while a redetermination or appeal is in process.

The short term benefit would also ensure that both the claimant and the decision maker have an interest in making sure the appeals process is quick and efficient.

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?

The Church of Scotland agrees with the use of the Scottish Government power to top up ‘reserved’ benefits. This has been demonstrated in its support for the Give Me Five: The Child Benefit Top-Up campaign already mentioned. We believe use of powers to top up ‘reserved’ benefit could make significant changes to the lives of children and families living in poverty.

The campaign, led by Child Poverty Action Group (CPAG) calls for an additional £5 per week paid by the Scottish Government for every child in Scotland – by topping up Child Benefit, which is reserved to Westminster. It has been calculated that topping up Child Benefit by just £5 a week could lift 30,000 children out of poverty in Scotland, and this is an investment that the Church supports. The Church calls for the Scottish Government to clearly set out within regulations a clear commitment to increase the incomes of families in receipt of Child Benefit.

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?

As stated previously, the Church welcomes the Scottish Government commitment to increasing Carer’s Allowance to the level of Jobseeker’s Allowance, and improving carer access to help and advice. However the regulations should stipulate that Carer’s Allowance being paid at the Jobseeker’s Allowance rate will have no material effect on other benefits such as Employment and Support Allowance.

The Church is also interested in the Scottish Government's longer term proposal to develop a Scottish Carers' Benefit that would provide financial support for those who choose to, or who have had to give up or limit their employment or study due to caring responsibilities.

The Church is also glad to note the Scottish Government's desire to recognise the important role that carers have in society. However the Church recognises that support for carers is not solely about money and is also highly dependent on peer and other forms of support.

The Church also welcomes the idea of a Young Carers Allowance to provide extra support for young people, but there remains the crucial need for peer support and respite care, and this must be recognised by the system.

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?

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

The Church of Scotland makes this response after consultation with one of its partners in housing and homelessness – Scottish Churches Housing Action.

The Church recognises the importance of discretionary housing payments, particularly in mitigating the impact of the 'bedroom tax', and agrees that this should continue largely as it is. We believe that the Scottish Government should continue its efforts to remove the 'bedroom tax'. A good benefit system should not require the top-ups from the DHP in order to provide adequate support - benefits should be available as of right, suiting the circumstances of the claimant.

The Church believes that over time the Scottish Government should be working to secure control over the housing benefit element of the Social Security system, and develop a set of policies suited to the particular circumstances in Scotland.

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

The Church of Scotland supports the following recommendations of the Poverty Truth Commission in their response to the Social Security Bill.

- All benefits should be unfrozen and updated annually in line with the Consumer Prices Index (CPI).
- The Housing Benefit component of Universal Credit should be paid directly to landlords
- Flexibilities regarding Universal Credit must also include the right to be paid fortnightly

The Church would also be interested to know if the Scottish Government will ensure these changes to Social Security are fed into policy strategies in other related areas (such as in health care or tackling homelessness). Will the principles underpinning Scotland's social security system affect other instances where people need to access need e.g. when asylum seekers are left destitute because they have been refused status but are unable to return to their country of origin. Will the Scottish Government's new social security strategy influence other connected areas of policy?

Appendix



The Church of Scotland

Church and Society Council

Official Response

SUBJECT: Consultation on Social Security in Scotland
REQUESTED BY: Scottish Government
REFERENCE: OR-2016/07
DATE: 28 October 2016
SUBMITTED BY: Irene MacKinnon on behalf of the Church and Society Council
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Introduction

The Church of Scotland welcomes the opportunity to contribute to the Scottish Government consultation on Social Security in Scotland, and respond to how the newly devolved powers which amount to 15% of the Scottish social security bill can be used to create a fairer and more just system for people who live in Scotland.

The Church of Scotland has a long history of practical campaigning against poverty and injustice while seeking to support the individual and communities. It pioneered efforts to support the poorest in society and has acted for many years to alleviate poverty. Prior to the establishment of the welfare state, it was to the church that many people in need turned and found practical support. It was also work done by the church, not least the Baillie Commission that met throughout the years of the Second World War that contributed significantly to the formation of the welfare state.

The Church has committed time and resources to the very poorest areas of Scotland, with dedicated ongoing work including that of the Priority Areas Committee and CrossReach, full-time staff and volunteers, and the Go For It Fund.

In 2014, the General Assembly noted the importance of involving people who are affected most by the decisions in the planning and implementation of welfare policies.⁵ For this reason, the Church welcomes the Scottish Government decision to have 'Experience Groups', comprising at least 2000 people who have direct experience of receiving benefits, to help shape and design Scotland's first ever social security system, following on from this consultation.

As part of this process, we would also recommend that the Government ensures that they reach out to people who are not currently part of the benefits system, to ensure that the views of those who cannot or do not receive benefits they are eligible for are heard. This would include people who have been sanctioned, those who have lost their benefits due to recent changes in the system, as well as those who are unable to access social security for other reasons such as illiteracy and homelessness.

The First Minister's desire to create a "fairer social security system that treats people with dignity and respect" is matched by the desire of the Church of Scotland which stated at its General Assembly in 2014 that, "the primary aim of the welfare system is to enhance human dignity for all, so that every citizen may live life in all its fullness, and urge all consideration of welfare policy to be characterised by the principles of fairness and compassion."⁶

Response

The Church supports the statements made by the Poverty Truth Commission in their response to Part 1 of the consultation.

The Church would like to specifically address Part 2 of the consultation, which covers devolved benefits to the Scottish Government.

Ill health and disability benefits

With over 500,000 people in Scotland in receipt of these benefits, the Church of Scotland affirms the Scottish Government's aim in seeking to centre the new social security system on dignity and respect.

Secretary of the Church and Society Council, Martin Johnstone, has worked alongside the Poverty Truth Commission, which has found through its research that people-led assessments are necessary in order for dignity and respect to be retained. This would be a welcome change from the current benefits system.

Consideration should be given to the claims procedure and the mechanisms in place for an individual to make a claim, and all communications proceeding from this. For example, if a claimant does not have access to a computer or the skills to use modern technology, the system should take account of this and make provision for a claim to be made face to face. Using a system that is weighted against individuals in society because of a lack of access to technology or specific skills should be avoided at all costs. Individuals should be able to choose a form of communication that suits them best.

With respect to lowering costs for disabled people and carers, such as spending some of their award on other services e.g. discounted energy tariffs, it is important that this approach would be voluntary

⁵ 2014 Church and Society Council deliverance, Church of Scotland

⁶ 2014 Church and Society Council deliverance, Church of Scotland

in order to preserve the individual's dignity. Otherwise, a system could be created where further stigma is generated.

The Church also recognises the importance and added value of initiatives such as the Motability scheme which provide a service that would be impossible to afford individually.

The Church of Scotland also welcomes the potential for exploring a 'whole-of-life' disability benefit that is responsive to people's needs at different stages of their lives.

Carer's Allowance

The Church of Scotland welcomes the Scottish Government's commitment to increase Carer's Allowance to the same level as Jobseeker's Allowance, amounting to almost an 18% increase. However the Church recognises that support for carers is not solely about money, and is also highly dependent on peer and other forms of support.

The Church also welcomes the idea of a Young Carers Allowance to provide extra support for young people, but there remains the crucial need for peer support and respite care, and this must be recognised by the system.

Best Start Grant

Although the Best Start Grant aims to reduce inequalities and close the attainment gap as part of an early years support initiative, it is important to recognise that the costliest time for parents can be when their children become teenagers.

Younger children's clothes can be a lot cheaper than those for older children, and smaller children are not necessarily so susceptible to ridicule from their peers as they are later in life. This has been highlighted by young people in the Poverty Truth Commission and Kinship Carers.

Because of this, the Independent Short Life Working Group on Food Poverty report, 'Dignity: Ending Hunger Together in Scotland', chaired by Martin Johnstone, called for a significant increase in Child Benefit.⁷ Although this would represent a significant cost, it would demonstrate the Scottish Government's ambition to take a truly preventative and long-term approach to reducing poverty among children, and ultimately in adults.

Funeral payments

A Funeral Payment grant for people on certain low income benefits should be part of a wider strategy that addresses the current postcode lottery, where some local authorities charge more for funeral costs than others.

The Church of Scotland is a member of the Funeral Poverty Alliance (FPA) which has developed the Fair Funeral Scheme. This calls on Funeral Directors to sign a pledge to recognise that funerals can be expensive, and many people struggle with the cost.

⁷ <http://www.gov.scot/Resource/0050/00502395.pdf> Accessed 20 October 2016

The Church agrees with the FPA call on the Scottish Government for a system where the Social Fund Funeral Payment (SFFP) is raised to cover the cost of a basic funeral, and for funeral directors to provide a basic funeral with a clear, visible price.

For the past three years, the Church of Scotland has committed time and resources to the issue of funeral poverty.

In 2014, General Assembly of the Church of Scotland urged the Scottish Government to address the issues surrounding funeral poverty in their review of the legislation relating to burials and cremations, urged local authorities and other operators to ensure that levies on bereaved families were fair, just and compassionate and that a fair pricing structure would be put in place for the services provided.

Following this report, the Church has been involved in this issue through the Scottish Poverty Working Group, which worked closely with Citizens Advice Scotland and John Birrel to compose a review for the Scottish Government in January 2016.⁸

The Church of Scotland reaffirmed at the General Assembly of 2016 its unique position that no parish minister should charge a fee for conducting a funeral.

Rev Bryan Kerr, minister of Greyfriars Parish Church in Lanark, is the Church's representative on the Scottish Working Group on Funeral Poverty, the Funeral Poverty Alliance and the Scottish Government Working Group on Funeral Poverty and Social Security Funeral Payment.

He identified that the UK Government's Department of Work and Pensions which has been administering the Social Fund Funeral Payment up until now has a cumbersome mechanism for checking eligibility, at a time when people are under the stress of bereavement. He wants the Scottish Government to ensure that when this power is devolved, the system for checking eligibility will be swift, to ensure that those who apply have the knowledge that funds will be made available to them to help with the cost of a funeral.

The Church of Scotland is committed to working with others to ensure better access to funding for those who need it most.

Winter Fuel and Cold Weather Payments

The 2016 General Assembly of the Church of Scotland called on Ofgem and the Scottish and UK Governments to address unfairness in domestic energy pricing. The Church also called on the Scottish and UK Governments to remove unnecessary barriers to Community Energy schemes.

The Church also called on energy companies to do more to protect vulnerable customers, and to publish debt and disconnection figures by postcode area. Regret was expressed that the Scottish Government will fail to fulfil its commitment to eliminate Fuel Poverty by November 2016, and the Church has called for this to be addressed as a matter of urgency, with a new timetable for elimination put in place.

The Church of Scotland believes that if there was an effective strategy in place to eradicate fuel poverty, by improving the housing stock and providing affordable warmth, such as that proposed by

⁸ <http://www.cas.org.uk/publications/funeral-poverty>⁸ <http://www.gov.scot/Resource/0050/00502395.pdf> Accessed 20 October 2016

⁸ <http://www.cas.org.uk/publications/funeral-poverty>

the Existing Homes Alliance⁹ (of which the Church of Scotland is a member), this would help to alleviate some of the issues social security has to address.

Universal Credit Flexibilities and the Job Grant

The Church of Scotland would welcome a smoother transition for those moving from receiving benefits to being in employment. A tapering of support rather than a sudden cut from the benefits system would ensure that appropriate support is given along the way.

The Church of Scotland would also support the move to split Universal Credit among individual members of the household to mitigate against situations of abuse or incapacity, and to promote gender equality. The preferred position on this would be to have automatic payments made to individuals, with the option to choose a joint payment.

Conclusion

The Church of Scotland strives to prioritise the poor and those in need as a witness to its practical Christian faith. It is hoped that Scotland's new social security system will be genuinely based on dignity and respect – with the human rights of an individual recognised, and for stigmatisation and marginalisation to be abolished. A new social security system for Scotland is an opportunity to change the way that people are viewed, and the Church of Scotland would urge the Scottish Government to use it as a means to eradicate inequality.

⁹ The Existing Homes Alliance Scotland is a coalition of housing, environmental, fuel poverty and industry organisations calling for urgent action to transform Scotland's existing housing stock and make it fit for the 21st century.