

Submission to the Work and Pensions Committee

Inquiry into the Adequacy of Benefits May 2023



About us

The Poverty Alliance is Scotland's anti-poverty network. Together with our members, we influence policy and practice, support communities to challenge poverty, provide evidence through research and build public support for the solutions to tackle poverty. Our members include grassroots community groups, academics, large national NGOs, voluntary organisations, statutory organisations, trade unions, and faith groups.

Introduction

A functioning social security system provides people with an anchor to protect them from being swept into poverty. A fundamental principle of this approach is that the level of financial support awarded to households must provide enough to cover essential needs and allow a life of dignity. Our current social security system is failing on this metric.

Social security should help to unlock people from poverty, but policies like the benefit cap and the two-child limit have meant that many people find themselves in a daily struggle to make ends meet. Research conducted by Joseph Rowntree Foundation and Trussell Trust found that 90% of low-income households on universal credit are going without essentials.¹ Similarly, the most recent data from Trussell Trust shows that they are handing out record numbers of food parcels² with their State of Hunger research linking an inefficient income from social security as the most significant factor driving food bank need.³ This is completely unjust.

The cost of living crisis has pushed low income households to breaking point. Already inadequate incomes were stretched beyond their limits, and many people

¹ The Trussell Trust & Joseph Rowntree Foundation (2023) *An Essentials Guarantee*. Available at: [an_essentials_guarantee_report.pdf \(jrf.org.uk\)](https://www.jrf.org.uk/essentials-guarantee-report)

² The Trussell Trust (2023) *Emergency food parcel distribution in the UK: April 2022 – March 2023*. Available at: <https://www.trusselltrust.org/wp-content/uploads/sites/2/2023/04/EYS-UK-Factsheet-2022-23.pdf>

³ The Trussell Trust (2023) *State of Hunger*. Available at: <https://www.trusselltrust.org/wp-content/uploads/sites/2/2021/05/State-of-Hunger-2021-Report-Final.pdf>

are now facing a growing debt crisis, with higher numbers of households facing negative incomes.⁴

It is important to recognise that the cost of living crisis is not new to people living on the lowest incomes. Since 2010, poverty has been steadily increasing, particularly amongst more vulnerable households such as those with children, disabled people and Black and minority ethnic communities. This can be directly linked to changes in our social security system such as the benefit cap, the two-child limit and the five week wait.

The social security system in the UK is long overdue overhaul, with a new system built around our shared values of justice and compassion. A social security system that provides support, freedom from poverty and affords people dignity is possible and we welcome this inquiry as means to begin this process.

Inquiry Response

What ‘essentials’ should working-age benefits in the UK cover? Are current working-age benefit levels sufficient to cover those needs?

Joseph Rowntree Foundation and Trussell Trust launched their Essentials Guarantee campaign at the beginning of 2023. Their campaign identified that Universal Credit (UC) currently fails to meet current living costs with the average single adult household requiring a conservative estimation of £120 per week, and a couple would require £200 in order to cover essential needs. There is therefore a gap of £35 per week for single households and a £66 gap for couples between the UC standard allowance and the cost of essentials.⁵ This is widened further for people under the age of 25 who, despite paying the same cost for essentials, receive just £67 per week in a single adult household or £106 per week in an adult couple household, this creates a gap of £53 and £94 per week respectively for those under 25.⁶

Different households will have different costs to cover their essentials depending on gender, age, number of children, dietary requirements and disabilities. It is crucial, therefore, that social security entitlement is designed with intersectionality at its heart to recognise these variances in need.

⁴ Christians Against Poverty (2023) *UK facing personal debt crisis as new data reveals impact of rising costs*. Available at: <https://capuk.org/news-and-blog/uk-facing-personal-debt-crisis-as-new-data-reveals-impact-of-rising-costs>

⁵ The Trussell Trust & Joseph Rowntree Foundation (2023) *An Essentials Guarantee*. Available at: [an_essentials_guarantee_report.pdf \(jrf.org.uk\)](https://www.jrf.org.uk/essentials-guarantee-report)

⁶ *ibid*

At a basic level, essentials that must be covered by social security include:

- Food – taking into account dietary needs due to dietary restrictions and religious practices.
- Energy – that considers the location of their home (rural and island locations will have higher heating costs) and the needs of those residing in the property (children, elderly, disabled people and people with health conditions)
- Real housing costs – taking into account the average costs of the local area and also any increases in these costs due to increase of mortgage interest rates and rent increases in both the social and private rented sectors.
- Clothing – taking into account children and disabled people that may require multiple clothing purchases due to growth spurts and wear.
- Travel – different localities (urban or rural) have higher travel costs and disabled people are more reliant on cars due to accessibility issues on public transport.
- Broadband/Phones – Digital access is an essential need, particularly as people have to manage online journals for Universal Credit.
- Sundries (toiletries) – taking into account the gendered element of this for example people who menstruate will spend more on menstrual products.
- Childcare

It is important to note that costs will be higher in some local areas. For example, people living in rural localities can expect to spend between 15-30% more on essential costs compared to people living in urban contexts.⁷ An adequate social security system should be able to respond to this and ensure that people living in rural areas are not penalised for where they live.

Are additional components of benefits, such as Personal Independence Payments, sufficient to cover the costs they are intended to cover?

As noted above, different households will have different essentials and a functioning social security system must be able to respond to those. At present, however, the different elements of Universal Credit (childcare, housing, disability, carer) only reflect different needs to a limited extent.

Disability-related benefit

Recent research and analysis by the disability charity Scope shows that on average, disabled households (with at least one disabled adult or child) need an additional

⁷ Changeworks (2023) *A Perfect Storm: Fuel Poverty in Rural Scotland*. Available at: <https://www.changeworks.org.uk/sites/default/files/A%20Perfect%20Storm%20-%20Fuel%20Poverty%20in%20Rural%20Scotland%20%281%29.pdf>

£975 a month to have the same standard of living as non-disabled households.⁸ According to Inclusion Scotland these increased costs come from having to use more expensive transport such as taxis, higher heating costs, special equipment and subsidising costs for necessary social care support.⁹

At present, disability-related benefits do not compensate people adequately for the extra costs of having an impairment or health condition, to help them realise their right to participate equally in society and independent living. It is vital that the UK Government ensure our social security system tackles the extra cost of disability. This must first focus on designing a welfare system that lifts disabled households out of poverty, as well as accurately capturing the full range and type of extra costs faced by disabled people.

Disabled people face barriers to entering good quality employment, including negative employment practice. As a result, the disability employment gap in Scotland sits at 31% and analysis by the TUC showed that disabled people in the UK on average earn 15.5% less than non-disabled people, which equates to around £3,003 less a year.¹⁰ It is therefore critical that our disability-related social security payments are set at a level which enables a dignified life, regardless of employment status.

Unpaid Carers

As the average population of the UK has increased, so has the number of people providing unpaid and informal care. Many carers struggle to balance employment and their caring responsibilities. Concurrently, there are significant financial costs associated with caring, with carers often using their income or savings to pay for support services and care equipment. The result is that carers are more likely to be living in poverty (29%) compared to those who do not provide care (20%).¹¹

It is clear that social security for carers is not adequate. We therefore echo the calls by Carers UK for the UK Government to:

- Raise the earnings limit for Carer's Allowance to 21 hours per week pegged to the National Living Wage to better enable more unpaid carers to continue with paid employment alongside their caring duties.
- Commit to a review of Carer's Allowance within the next 6 months, including how it interacts with other social security benefits.

⁸ Scope (2023) *Disability Price Tag 2023: the extra cost of disability* available at <https://www.disabilityrightsuk.org/news/new-research-shows-huge-rise-extra-costs-disabled-households>

⁹ Inclusion Scotland (2022) *Briefing: Disabled People, Poverty and the Cost of Living Crisis*. Available at: <https://inclusionScotland.org/wp-content/uploads/2023/02/Inclusion-Scotland-Briefing-Disabled-People-Poverty-and-the-Cost-of-Living-Crisis-Version-1-November-22nd.pdf>

¹⁰ Trade Unions Congress (2020) *Disability pay and employment gaps 2020*. Available at: <https://www.tuc.org.uk/research-analysis/reports/disability-pay-and-employment-gaps-2020>

¹¹ Joseph Rowntree Foundation (2023) *Poverty in the UK*. Available at: <https://www.jrf.org.uk/report/uk-poverty-2023>

- Give unpaid carers in receipt of Universal Credit a Work Allowance to ensure that those with a capacity for work do not lose their entitlement if they continue with part time work alongside their caring duties.
- Create a mechanism to enable unpaid carers to access their State Pension up to 5 years earlier.
- Create auto-enrolment payments for carers in receipt of Carer's Allowance to ensure that they continue to contribute to additional pensions.¹²

Housing Element

The housing element is tied to local housing allowance (LHA) rates, intended to reflect average rental costs of the area and help people meet their housing costs. LHA however was frozen in 2016 and altered to reflect the lowest 30th percentile of average rental costs in 2020. Given that rents increase over time, to different extents in different areas, this is quickly creating a significant gap between actual housing costs and the maximum support available to low income renters.¹³ Due to the geographical disparities of rent increases, this creates arbitrary differences between the support that different families can access depending on where they live and penalising households in areas of high rent increases thus driving up rates of poverty.¹⁴ Shelter UK have noted that due to this, 32% of private renters currently receiving housing benefit have been unable to rent somewhere they wanted in the last five years because they were on social security.¹⁵ Freezing LHA rates means that people are receiving less support over time, and forcing families to use alternative income to top up housing costs - money which could be used to cover other essential costs such as food, energy and broadband.

The lack of available housing for social rent coupled with the increasing lack of affordability of home ownership is pushing more people into the private rented sector, exposing more people to expensive rents and inadequate support for housing costs. Failing to increase LHA rates actively separates need from entitlement, pulling people into poverty. There appears to be no rationale to retain current LHA rates beyond a desire to reduce government spend on housing support.

At a minimum, the housing element should be reassessed annually to ensure that support matches actual housing costs. Relatedly, there must be improvements on the current monitoring of the private rented sector and the level of rent landlords are

¹² Carers UK (2021) *Valuing Carers 2021*. Available at:

<https://www.carersuk.org/media/2d51e03c/valuing-carers-report.pdf>

¹³ Institute for Fiscal Studies (2023) *Freezes in housing support widen geographic disparities for low-income renters*. Available at: <https://ifs.org.uk/articles/new-data-shows-continued-freezes-housing-support-widen-geographic-disparities-treatment>

¹⁴ Joseph Rowntree Foundation (2023) *UK Poverty 2023*. Available at:

<https://www.jrf.org.uk/report/uk-poverty-2023>

¹⁵ Shelter UK (2022) *Submission: Inquiry into reforming the private rented sector (Levelling Up, Housing and Communities Select Committee)*. Available at:

https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/submission_inquiry_into_reforming_the_private_rented_sector

charging to ensure that support is adequate to meet actual housing costs. This is more acutely needed in the wake of rising interest rates on mortgages which are often passed onto tenants.¹⁶

Two Child Limit

The two child limit is further area of social security which separates entitlement from need, and thus actively drives up poverty. According to Child Poverty Action Group (CPAG), the government's rationale for the limit is to ensure that families receiving benefits face the same financial considerations about having children as families supporting themselves solely through work.¹⁷ However, many children affected by the policy are not the result of family planning or even born while their parents are receiving benefits. This rationale is an over-simplistic understanding of people's lives and experiences and fails to justify a policy that actively pulls children and their families into poverty. Furthermore, research has shown that the policy has no impact on fertility rates,¹⁸ it simply takes money away from families in their time of need, pulling them into poverty. This policy also ignores realities about women's choices in pregnancy, including the impact of domestic abuse and elements of reproductive coercion.¹⁹ We call for the end of the two child limit as a matter of urgency. This would be the most cost-effective way to reduce child poverty with the removal of this policy lifting 250,000 children out of poverty, with 850,000 of these children being lifted out of deep poverty at a cost of only £1.3 billion.²⁰

Are working-age benefit levels appropriately set to encourage people who are able to work into work?

The Poverty Alliance believe that social security should exist to act as a safety net, to catch people when they need it and protect them from poverty. A social security system that has higher replacement ratios, rather than low levels of entitlement, will be more effective in supporting people back into the labour market. We therefore have concerns with the notion of tying the levels of benefits to 'incentivising' people claiming benefits to return to work, and we do not believe that this is the role of social

¹⁶ The Big Issue (2022) *Landlords set to pass on mortgage rate hikes to tenants*. Available at:

<https://www.bigissue.com/news/housing/will-landlords-pass-on-mortgage-rate-hikes-to-tenants/>

¹⁷ Child Poverty Action Group (2023) *Six years in: The two-child limit is pushing 1.1 million children deeper into poverty*. Available at:

https://cpag.org.uk/sites/default/files/policy/Six_years_in_two_child_limit-final.pdf

¹⁸ Larger Families Project (2022) *Does cutting child benefits reduce fertility in larger families?*

Evidence from the UK's twochild limit. Available at: <https://largerfamilies.study/publications/does-cutting-child-benefits-reduce-fertility-in-larger-families-evidence-from-the-uk-s-two-child/>

¹⁹ Engender *Parliamentary Briefing – Universal Credit* available at

<https://www.engender.org.uk/content/publications/Engender-Parliamentary-Briefing-Universal-Credit.pdf>

²⁰ Child Poverty Action Group (2023) *Budget submission 2023*. Available at: <https://cpag.org.uk/policy-and-campaigns/briefing/budget-submission-2023>

security support. There are structural barriers that prevent people from entering good quality employment and it will not always be possible for people to enter work. Regardless of people's employment status, they are deserving of a life of dignity and decency.

There are, however, ways that benefits can better support people into work, and this links to: what people are able to afford when receiving benefits, how benefits interact with employment and how people in receipt of benefits are supported into work. As discussed earlier, there currently exists a disconnect between the level of benefits awarded and the costs of essential needs. For an individual to access paid employment, they will be required to pay for transport and childcare to enable them to attend work, interviews and training. At present, the level of benefit does not provide sufficient resources to access these enabling factors.

Childcare is critical to enabling parents to enter and progress within paid employment. This is particularly true for mothers and single parents, over 90% of whom are women. The provision of affordable and flexible childcare often determines whether women have a job, what hours they work, and their earnings. The high cost of childcare means that paid work is simply not viable for many parents. Childcare provision is also critical to enabling parents to access education or training opportunities which may improve their employment prospects in the longer term. Through the Poverty Alliance's Get Heard Scotland²¹ project, we have heard from people living on low incomes in Scotland that the availability and cost of childcare remains a key barrier to parents being able to access adult upskilling and reskilling support.

In 2021, 25% of single parents said childcare costs had forced them to cut back on essential items such as food and heating.²² This is echoed in our joint research with the Scottish Women's Budget Group which showed that childcare was already unaffordable for many women prior to the cost of living crisis. Women who participated in our research were concerned about their ability to maintain paid employment in the longer term, with expected price rises in the cost of childcare, alongside other living costs, making employment a challenge.²³

Given the key role childcare plays in providing parents with support to access employment, we welcomed the recent expansion of childcare provision in England.

²¹ Get Heard Scotland (GHS) helps people affected by poverty get their voices heard on the policies and decisions that most impact their lives. The programme is coordinated by the Poverty Alliance and funded by the Scottish Government as part of its Child Poverty Delivery Plan. For more information see - [Get Heard Scotland - The Poverty Alliance](#)

²² Women's Budget Group (2021) *Mega survey of UK parents shows that childcare is failing families* available at <https://wbg.org.uk/analysis/reports/mega-survey-of-uk-parents-shows-that-childcare-is-failing-families/>

²³ Scottish Women's Budget Group (2022) *"Its hard work being poor" - Women's experiences of the cost of living crisis in Scotland*. Available at: <https://www.povertyalliance.org/its-hard-work-being-poor-womens-experiences-of-the-cost-of-living-crisis-in-scotland/>

We do however note concerns with stringent job search requirements and the current interactions with social security through the taper rate. Universal Credit reinforces an outdated male-breadwinner-female-carer model. The design of the earnings disregard means that Universal Credit fails to “make work pay” for many lone mothers and so-called “second earners”.²⁴ In light of this, we echo the calls of CPAG for a universal credit work allowance for second earners in families. A work allowance for second earners in households with children (often mothers who are often the primary carers for children) would enable this group to keep a portion of their wages in full before universal credit starts to be withdrawn at a rate of 55p in the pound – as is the case for ‘primary earners’ in families on UC. Currently second earners entering work lose 55p in reduced UC from the first £1 they earn so the gains from work can be very low and create financial hardship, disincentivising people from accessing work.²⁵

There is also work to be done on considering fluctuating working patterns, part time work and how these earning patterns interact with Universal Credit. Our research on experiences of Universal Credit in Glasgow featured a case study demonstrating this:

“At both her first and second interview, Hazel was working, in employment with varied hours. Her views of Universal Credit were largely positive, and she found applying for Universal Credit and using the online journal relatively straightforward. She was actively looking for more work at her first interview and had been reliant on her personal savings at the stage of her claim.

While Hazel found being able to work fluctuating hours while still receiving Universal Credit positive, she raised the uncertainty of not knowing how much money she might receive a month and how much of her rent might be paid. At both her first and second interview, she said that she avoided looking at her financial situation because it was so dire. Hazel clearly stated that the amount of money under Universal Credit was not enough to live on without working.”
(Case Study 4)²⁶

The mechanisms for interactions between universal credit and work should be reassessed so that claimants do not have to reapply every month and provide some guarantee of income.

²⁴ Engender Parliamentary Briefing – Universal Credit available at <https://www.engender.org.uk/content/publications/Engender-Parliamentary-Briefing-Universal-Credit.pdf>

²⁵ Child Poverty Action Group (2023) *UK Spring Budget – Step Forward On Childcare, But No Extra Direct Support For Children In Poverty*. Available at: <https://cpag.org.uk/news-blogs/news-listings/uk-spring-budget-%E2%80%93-step-forward-childcare-no-extra-direct-support-children>

²⁶ University of Glasgow and the Poverty Alliance (2020) *How well is Universal Credit supporting people in Glasgow?* Available at: <https://www.povertyalliance.org/wp-content/uploads/2020/06/How-well-is-Universal-Credit-supporting-people-in-Glasgow.pdf>

What lessons can be learned in respect of benefits provision more generally from the £20 uplift to Universal Credit, introduced during the pandemic?

In April 2020, the UK Government made the right decision to increase Universal Credit by £20 per week. Research conducted by YouGov on behalf of Trussell Trust at the time showed that the uplift provided a vital lifeline to low income households struggling with the financial pressures brought by the pandemic. Seven in ten people on Universal Credit stated that the increase has made it easier to afford essentials.²⁷ At the time, research in Glasgow showed that demand for food vouchers steadily dropped over the course of the pandemic, coinciding with the £20 increase.²⁸

When there was the proposed cut in October 2021, we along with a large number of organisations raised significant concerns about the impact of removing this uplift at a vital point in the pandemic recovery period. In research conducted by YouGov on behalf of Trussell Trust, Universal Credit claimants noted that the increase of £20 merely allowed them to be able to buy essentials that they were previously struggling to afford and reduced the number of occasions where people were forced into impossible choices between heating²⁹ or eating. The uplift of £20 was the right thing to do and provided a vital lifeline to a number of vulnerable households during a time of significant uncertainty and financial precarity.³⁰

The uplift and subsequent cut acutely demonstrated that increasing social security makes significant differences to the experiences of people living on low incomes and reduces reliance for charitable food aid. In short, increasing social security payments tackles poverty.

What principles should inform the design and delivery of the working-age benefits system (e.g. fairness, transparency, inclusivity)?

In 2016, the Scotland Act (2016) was passed, granting some social security powers to the Scottish Government. The resulting Social Security (Scotland) Act 2018 saw the creation of Social Security Scotland (SSS). In their charter, Social Security Scotland base their service delivery on the values of Dignity, Fairness and Respect

²⁷ The Trussell Trust (2021) *The real impact of removing the Universal Credit uplift*. Available at: [The real impact of removing the Universal Credit uplift - The Trussell Trust](#)

²⁸ Castlemilk Law Centre, Glasgow Community Food Network and Glasgow University (2021). *Food Poverty in Glasgow during Covid-19*. Unpublished.

²⁹ This was prior to the most recent energy price increases

³⁰ The Trussell Trust (2021) *The real impact of removing the Universal Credit uplift*. Available at: <https://www.trusselltrust.org/2021/02/08/the-real-impact-of-removing-the-universal-credit-uplift/>

and this has become a central component in administration of devolved social security benefits.

Basing administration of social security around these values appears to have had a positive impact for people accessing Scottish benefits. Most recent data from Social Security Scotland showed that the vast majority of people who accessed benefits from them felt listened to, respected, and treated with kindness.³¹

Social Security Scotland also embed lived experience panels into their policy development and evaluation processes.³² At the Poverty Alliance we strongly encourage involving the lived experience of people living on low incomes in the design of policies aimed to impact them. People with lived experience of applying for and relying on benefits are the experts in what works and what does not work in social security. Embedding lived experience is also a means to tackle poverty-related stigma by empowering people living on low incomes to design these policies which are equitable and fit for purpose via genuine co-design and co-production processes.

As part of the inquiry into poverty-related stigma, the Corra Foundation noted that:

“...if people’s experiences of poverty are misunderstood, and the day-to-day challenges they face overlooked, there is a risk stigma could be amplified and the extent people engage with services reflects how well they feel seen and heard.”

It is therefore crucial that putting lived experience at the heart of policy design is coupled with an understanding of the responsibility to safeguard people providing their experience, with for example training and well-being support.

Designing benefits policy

What should be the purpose of working-age benefits?

Our social security system was built on the values of compassion and justice. Our economy has been changed significantly since the post war period from a position of relative full employment, with significant manufacturing and heavy industry, to one where the service sector dominates, with growing insecurity and instability for many. In that context, working-age benefits must be renewed and strengthened, so that households are guaranteed stable, adequate incomes that provide a foundation

³¹ Social Security Scotland (2020) *Social Security Scotland Client Survey: 2018-2020*. Available at: <https://www.socialsecurity.gov.scot/reporting/publications/social-security-scotland-client-survey-2018-2020>

³² Social Security Scotland (2022) *Social Security Experience Panels: Annual Report 2022*. Available at: <https://www.gov.scot/publications/social-security-experience-panels-annual-report-2022/documents/>

for people to build their lives and exercise their freedoms, as they move in and out of a precarious and fast-changing labour market.

As put by one of our community activists:

“In a just and compassionate society, we should all be able to live a dignified life. Everyone one of us is different, we all need different levels of support and have different needs. But there is one thing that everyone I meet who’s had similar experiences to me agrees on; we all have a right to an income that guarantees us enough to live on.”³³

What is the role of i) the benefit cap; ii) repayments; iii) sanctions on the adequacy of benefits?

Benefit Cap

Our campaign *Scrap the Cap* draws attention to this unjust policy and calls for the removal of this cap. The Scottish Government has mitigated the cap since January 2023 and so our answer below reflects the need for the removal of the cap entirely.

First and perhaps most importantly, the cap removes the link between need and entitlement and pushes families into poverty and hardship. The way the benefit cap is designed means that those who need the most money to get by – such as lone parents with young children, larger families, and people who are not fit to work – are the most likely to have their support capped. The shortfall in income between what a household needs to get by and what they receive means that many families cannot afford basic necessities like food, clothes, and energy; often being forced to use foodbanks or rely on pay-day loans.

The benefit cap has significant equalities issues with the cap disproportionately affects households most likely to be facing poverty and limited incomes such as lone parents, larger families, and Black and minority ethnic people. Across the UK, 62% of people affected by the benefit cap are single parents of which 92% are women.³⁴ While this discrimination is wrong in itself, a 2018 report by One Parent Families Scotland and Child Poverty Action Group in Scotland showed that almost four in five lone parent households affected by the cap were claiming income support because they had young children and were not expected to seek work, and one in six were

³³ The Poverty Alliance (2021) *A Scotland for All Of Us: Poverty Alliance 2021 Scottish Parliament Election Manifesto*. Available at: <https://www.povertyalliance.org/wp-content/uploads/2021/03/A-Scotland-for-all-of-us-Poverty-Alliance-2021-Scottish-Parliament-election-manifesto.pdf>

³⁴ The Poverty Alliance (2021) *Scrap the Cap Campaign Pack*. Available at: <https://www.povertyalliance.org/wp-content/uploads/2022/04/Scrap-the-cap-campaign-pack-4.pdf>

claiming employment and support allowance suggesting that they had been assessed as not being fit for work.³⁵

On larger families, prior to the 2023 mitigation of the cap by the Scottish Government, of households with children that were capped, 75% had 3 or more children. A Child Poverty Action Group report in 2021 highlights that families with children have experienced greater hardship during the pandemic meaning that larger families have faced a greater tightening on household budgets, intensifying the impact of the benefit cap on these households.

Related to this, Black and minority ethnic families are more likely to be affected by the benefit cap because they are more likely to have larger families. In England, four in 10 households affected by the benefit cap are BAME, although they only make up 20% of the population.³⁶ Racial inequalities in the UK, such as income or health inequality, are caused and exacerbated in part due to social and economic policy, including the adequacy of social security payments as a result of the benefit cap.³⁷

The benefit cap also has significant impacts on children's wellbeing and ability to live a decent life. The Supreme Court found that the benefit cap breaches the UN Convention on the Rights of the Child and deprives families with children from the income they need to stay afloat.³⁸ A study of more than 10,000 benefit capped households found that for every child whose parents moved back into work as a result of the cap, eight more would grow up in families whose financial circumstances worsened following the introduction of the policy.³⁹ On wellbeing, research from the London School of Economics from 2020 shows that it has negatively impacted the mental health of families, including children, who were found to experience anxiety and depression due to the instability caused by insufficient income and mounting debt.⁴⁰ Overall, the benefit cap has had an overwhelmingly negative impact of those it affects, particularly children and families.

³⁵ One Parent Families Scotland, Child poverty Action Group (2018) *A report on the benefit cap*. Available at: https://cpag.org.uk/sites/default/files/files/page/CPAG%20-%20Scot%20-%20Benefit%20cap%20report%20%28Jan%2018%29_0.pdf

³⁶ Joseph Rowntree Foundation (2021) *New research highlights 'shameful' racial disparities in housing system*. Available at: <https://www.jrf.org.uk/press/new-research-highlights-%E2%80%98shameful%E2%80%99-racial-disparities-housing-system>

³⁷ *ibid*

³⁸ The Supreme Court (2015) *Judgement - R (on the application of SG and others (previously JS and others)) (Appellants) v Secretary of State for Work and Pensions (Respondent)*. Available at: <https://files.monckton.com/wp-content/uploads/2015/03/R-on-the-application-of-SG-and-others-previously-JS-and-others-v-Secretary-of-State-for-Work-and-Pensions.pdf>

³⁹ Policy in Practice (2018) *Benefit Cap: Policy in Practice's evidence to the Work and Pensions Select Committee*. Available at: <https://policyinpractice.co.uk/benefit-cap-policy-in-practices-evidence-to-the-work-and-pensions-select-committee/>

⁴⁰ London School of Economics (2020) *Did the introduction of the benefit cap in Britain harm mental health? A natural experiment approach*. Available at: <https://sticerd.lse.ac.uk/dps/case/cp/casepaper221.pdf>

In addition to this, the benefit cap simply does not meet the Government's stated policy aims. The cap was introduced, in part, with the goal of incentivising work. Yet, Policy in Practice estimated that for every 100 households affected by the cap, only around four will move into work because of it.⁴¹ Further, there is evidence that the policy actually makes it harder for some families to find employment due to their incomes being unable to meet the transport and childcare costs needed to access work as detailed earlier in this submission. Moreover, studies show that the benefit cap could have the unintended consequence of pushing out-of-work people even further away from the labour market, due in part to the impact the policy has on mental health.⁴²

Repayments

The UK Government should reduce the maximum cap on Universal Credit debt deductions so that an individual's income does not fall below the level required for them to afford essentials. As detailed earlier in this consultation, this should reflect the amounts stated in the *Essentials Guaranteed* campaign by JRF and Trussell Trust.⁴³

Participants in our research *How well is Universal Credit supporting people in Glasgow* who had experience of claiming and living on Universal Credit experienced high levels of stress and financial insecurity due to deductions, which often had to be managed alongside other debts.⁴⁴ The impact of Universal Credit deductions have been particularly acute during the cost-of-living crisis. Recent research by the charity Aberlour has highlighted that more than half (55%) of Scottish families with children in receipt of Universal Credit have their monthly income reduced by around 10%, equating to £80 on average, as a result of deductions by DWP to recover debts. Moreover, more than a quarter (27%) have multiple deductions by the DWP to recover debts to public bodies.⁴⁵ Making repayments on debts means even less money available for essential needs, whilst concurrently causing significant stress and poor mental health. Increasing the cap on deductions from Universal Credit for state debt would help to reduce the harm caused when households are faced with a reduction in income due to deductions to reduce debt. These deductions can pull households further into poverty and does little to support households from falling into new debt as they have even less money to afford everyday living costs. During the

⁴¹ *ibid*

⁴² London School of Economics (2020) *Did the introduction of the benefit cap in Britain harm mental health? A natural experiment approach*. Available at: <https://sticerd.lse.ac.uk/dps/case/cp/casepaper221.pdf>

⁴³ The Trussell Trust & Joseph Rowntree Foundation (2023) *An Essentials Guarantee*. Available at: [an_essentials_guarantee_report.pdf \(jrf.org.uk\)](https://www.jrf.org.uk/essentials-guarantee-report)

⁴⁴ University of Glasgow and the Poverty Alliance (2020) *How well is Universal Credit supporting people in Glasgow?* Available at: <https://www.povertyalliance.org/wp-content/uploads/2020/06/How-well-is-Universal-Credit-supporting-people-in-Glasgow.pdf>

⁴⁵ Aberlour (2022) *Universal Credit deductions for households with children by Scottish Local authorities* available at <https://www.aberlour.org.uk/news-item/new-report-debt-to-public-bodies>

ongoing cost of living crisis, the Government should immediately stop collection of public sector debt for a period of at least six months, helping households to use money on essentials like food, energy and housing costs.

Sanctions

Our social security system should be there to protect all of us, but the punitive application of sanctions is too often pulling people into poverty and inflicting the very harm it is intended to prevent. For many people, sanctions can result in destitution. We have provided more analysis on sanctions later in our response.

What is the impact of No Recourse to Public Funds conditionality on benefit provision for affected households?

No recourse to public funds (NRPF) actively pushes people into destitution. An inability to access public funding such as benefits removes the safety net that would normally be able to provide some protection to people facing short term periods of financial stress.⁴⁶

Destitution is a significant problem for people coming to the UK through the asylum system. Coming from different cultures and backgrounds, perhaps being unable to speak English, asylum seekers face significant challenges settling in the UK. However, often the biggest challenge is stretching the limited support asylum seekers receive to meet their basic living costs. The support awarded to asylum seekers by the Home Office is insufficient to ensure people meet their basic needs. Combined with an inability to access work or even a bank account (for some), people seeking asylum are forced to live in destitution.⁴⁷ For those who are able to access work, the system leaves people without a crucial safety net in case of loss of employment.

For the above reasons, we believe that NRPF actively drives up poverty rates for some of the most vulnerable in our society and call for the removal of this punitive policy. However, should the policy be retained, it must be amended to protect people from poverty and destitution. As called for by the UK Parliament's All Parliamentary Group on Homelessness, NRPF conditions should be removed for the most vulnerable such as those with children, vulnerable adults, those with care needs,

⁴⁶ Scottish Government (2021) *Ending destitution together: strategy*. Available at: <https://www.gov.scot/publications/ending-destitution-together/documents/>

⁴⁷ British Red Cross (2021) *How will we survive? Steps to preventing destitution in the asylum system*. Available at: <https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/exploring-destitution-in-the-asylum-system-and-models-of-prevention>

people at-risk of homelessness and those experiencing domestic abuse.⁴⁸ In Scotland, as called for by the Scottish Government in their *Ending Destitution Together* report, the Scottish Welfare Fund should be removed from the restricted public funds list to allow for support in times of crisis and destitution.⁴⁹

What role could, or should, an independent body undertake in advising Government on benefit policy?

As called for in the *Essentials Guarantee* campaign, an independent body should undertake annual measurements of the real cost of living, what items should currently be defined as essentials (for example, broadband would now be considered and essential) and measure the cost of these against awards made through social security. This process should ensure that awards are updated annually to ensure that people are afforded a life free from poverty. This must ensure that inflationary increases are fully incorporated to award increases and ensures that benefit levels are not dictated by Government ideology, but the real cost of living. As called for by Bright Blue, we recommended an expanded and reformed Social Security Advisory Committee which would be modelled after the low pay commission.⁵⁰ This independent body be tasked with setting minimum income thresholds below which nobody is allowed to fall, accounting for the differing costs incurred by specific households, as outlined in question one.

How does the design of benefit provision within the UK's four nations vary? How are recipients of working-age benefits affected?

The introduction of the Scottish Child Payment in 2021 was of significant benefit to working age families living on low incomes in Scotland was. Available to children in households who are in receipt of low income benefits, when introduced the Scottish Child Payment provided £5 per week per child in order to reduce child poverty rates in Scotland. The payment has since been increased and is now £25 per week per child, with the most recent increase estimated to be lifting 50,000 children out of poverty in the 2023/24 financial year.⁵¹

⁴⁸ All-Party Parliamentary Group on Homelessness (2022) *Our inquiry into whether the Government is on track to end rough sleeping in England by 2024*. Available at:

<https://www.crisis.org.uk/media/247903/crisis-appgeh-report-on-ending-rough-sleeping-by-2024.pdf>

⁴⁹ Scottish Government (2021) *Ending destitution together: strategy*. Available at:

<https://www.gov.scot/publications/ending-destitution-together/documents/>

⁵⁰ Bright Blue (2022) *Building Up – The future of social security*. Available at:

<https://www.brightblue.org.uk/portfolio/building-up-the-future-of-social-security/>

⁵¹ Scottish Government (2022) *Scottish Child Payment – estimating the effect on child poverty*.

Available at: <https://www.gov.scot/publications/scottish-child-payment-estimating-the-effect-on-child-poverty/>

This is coupled with a package of other benefits including the Best Start Grants, Best Start Foods, Child Winter Heating Assistance and, through discretionary housing payment – a mitigation of the benefit cap.

As detailed earlier in this submission, Social Security Scotland was built on the values of dignity, fairness, and respect and this has positively influenced both the treatment of applicants and recipients for benefits in Scotland but also the design and investment in social security policies. This is an approach we would urge the Department of Work and Pensions to learn from. Child poverty in Scotland (currently 24%) is gradually reducing and remains lower to most recent data from England (29%).⁵² It is clear that this approach by Social Security Scotland is having positive effects for people living on low incomes in Scotland.

Work incentives

What impact do working-age benefits, such as Universal Credit, New Style Job Seeker's Allowance and New Style Employment and Support Allowance, have on work incentives?

As detailed in earlier sections, the current design of working-age benefits does little to encourage people into work. The misalignment with real living costs and social security amounts means people can be able unable to afford the transport and childcare costs associated with starting work. We have also previously identified inefficient upskilling and training opportunities for people who may lack the qualifications and skills to access well paid employment.

The design of these benefits also negates to consider the need for flexible working by some individuals, particularly parents, disabled people and people with caring responsibilities' groups all more vulnerable to poverty and whom face distinct barriers entering the workforce. The UK Government recently announced plans for flexible working to become a day one working right as part of their plans to make flexible working the default - this should be introduced as matter of urgency.

What is the impact of policy interventions designed to incentivise work, such as sanctions, on the adequacy of support received by individuals—both monetarily, and in how they help individuals to find work?

We strongly disagree with the use of sanctions within the UK social security system. We do not believe sanctions are effective in supporting people into work, and instead

⁵² Action for Children (2020) *Where is child poverty increasing in the UK*. Available at: <https://www.actionforchildren.org.uk/blog/where-is-child-poverty-increasing-in-the-uk/>

they act to push people into poverty and destitution. This has been conveyed to us by participants in our research on Universal Credit and in reports such as the *Welfare Conditionality Project* who found that benefit sanctions do little to enhance people's ability to prepare for, seek, or enter paid work. Conversely, sanctions routinely trigger profoundly negative personal, financial, health and behavioural outcomes and push some people away from collectivised welfare provisions.⁵³

Our research *How well is Universal Credit Supporting People in Glasgow* showed that sanctions were viewed as being ineffective by Job Centre staff in influencing claimants to move towards work, with many emphasising that they would seek every alternative option rather than using a sanction.⁵⁴ This has also been reflected in recent research conducted by the Department for Work and Pensions which showed that sanctions had a negligible impact on moving people into work and when people were able to find employment, it was likely to be low paid.⁵⁵

Participants were very critical of the use of sanctions. They felt as a response their use was disproportionate and that the adverse consequences of being sanctioned were detrimental:

"I don't want to be very angry and negative, but I just genuinely feel and know that people are just almost cast off from society when they're on these benefits. It's very, very difficult to feel that ... it's difficult get out of that hole. So if you're on a sanction, you're making it even worse. There ain't no benefits to being on sanction ... to get a sanction. I don't know what it's meant to achieve."⁵⁶

Those who had experience of claiming Universal Credit emphasised that the fear of sanctions caused significant anxiety. Additionally, claimants interviewed felt that the conditions placed upon those with job-search expectations were unrealistic and that work coaches did not explain it well enough. The impact of this stringent expectation on claimants' feelings of anxiety around Universal Credit was evident in the interviews conducted for this research:

"It's not about apply for that, apply for that – that's what folk think they need to do, and it's freaking them out, it really is, folk are losing sleep over it. You've got to explain, it's not all about job hunting, it's about everything related to it. And they've just not ... big 35 on the sheet, sign that. And it's far too arbitrary,

⁵³ http://www.welfareconditionality.ac.uk/wp-content/uploads/2018/06/40475_Welfare-Conditionality_Report_complete-v3.pdf

⁵⁴ University of Glasgow and the Poverty Alliance (2020) *How well is Universal Credit supporting people in Glasgow?* Available at: <https://www.povertyalliance.org/wp-content/uploads/2020/06/How-well-is-Universal-Credit-supporting-people-in-Glasgow.pdf>

⁵⁵ Department for Work & Pensions (2023) *The Impact of Benefit Sanctions on Employment Outcomes*. Available at: <https://www.gov.uk/government/publications/the-impact-of-benefit-sanctions-on-employment-outcomes-draft-report>

⁵⁶ *ibid*

it's horrible. So, explain that, and soften it, you need to be a bit more flexible with that. Because some folk just haven't got the computer skills, know what I mean."

The participants' accounts highlighted their constant worry of whether they were 'doing enough' to meet the expectations of their work coach and the job-search expectations included in their claimant commitment. An excerpt from our research on experiences of Universal Credit in Glasgow conveys this:

However, feelings of anxiety were still prevalent for several participants at the second interview due to the ongoing lack of human contact through the online journal as well as fears of being sanctioned. The five-week wait still had negative consequences on claimants' financial situation, with many paying back deductions from advance payments and rent arrears. There were several examples of borrowing money from friends and family, having to go without food and a sense of feeling trapped in their home due to a lack of money to afford transport or leisure activities.

When asked what had changed between her first and second interview, Anna explained how she did not have enough money to pay her rent for her private tenancy she shared with her daughter, with several deductions being made from her Universal Credit payments for an advance payment, Council Tax arrears and a Social Fund loan. She said:

"Well just struggling financially on the small amount of money that we get on benefits, it just isn't enough. So, I'm facing being homeless, just don't have enough rent money"⁵⁷

This left people feeling disempowered and lacking in independence, which in turn led to a sense of a resigned acquiescence, which was evident across the interviews and in the Universal Credit claimant workshop.

"I don't see that as encouraging an independent spirit in myself. It's not empowering to be frightened ... It's actually pretty hostile"

Contextually, it is important to note that the people most likely to receive sanctions are groups with more complex needs such as those in temporary accommodation or those facing mental health issues.⁵⁸ In these contexts, researchers found that a safeguarding approach was more useful in ensuring claimants were not losing out on money. Some examples of good practice include the establishment of partnership protocols in Glasgow ensuring that where partner agencies were working with clients in very challenging circumstances, they could work with named contacts at the DWP to ensure this was known and likely issues could be anticipated – that is, trying to

⁵⁷ ibid

⁵⁸ ibid

avoid sanctions for a 'Failure to Attend', for example, being applied because the DWP could not reach a client and was unaware of the difficult circumstances they were in.

Accessibility and Administration

What aspects associated with the administration of benefits impact the adequacy of experience for claimants?

In research conducted by the Poverty Alliance and the University of Glasgow into people's experiences of Universal Credit in Glasgow, claimants widely reported the initial waiting period of five weeks for the first payment as the worst part of moving onto Universal Credit. This arbitrary waiting period pulled some into poverty, and people struggled to understand the rationale for this policy. Several claimants struggled to afford essentials like food during this period; many relied on family or friends to get by; and most took advance payments to avoid immediate rent arrears and hunger, but then had difficulty managing repayment deductions.⁵⁹ The five week wait has also been identified as a key driver of foodbank use by the Independent Food Aid Network.⁶⁰

Claimants also found difficulties with the overall application system. Jobcentre Plus staff who took part in our research on Universal Credit in Glasgow highlighted the potential for UC to be simpler and more flexible for claimants. They also indicated wider issues related to the structure of the social security departments within the Department of Work and Pensions, expressing concern about high caseloads, and the need to offer more support in more complex cases, especially disabled people and those with mental health issues.⁶¹

Through our Get Heard Scotland project, we worked with people living on low incomes in the early months of 2023 to identify the barriers they experience to accessing upskilling and reskilling support.⁶² We heard from participants that a lack of clarity as to how skills programmes would impact their social security payments; a

⁵⁹ University of Glasgow and the Poverty Alliance (2020) *How well is Universal Credit supporting people in Glasgow?* Available at: <https://www.povertyalliance.org/wp-content/uploads/2020/06/How-well-is-Universal-Credit-supporting-people-in-Glasgow.pdf>

⁶⁰ Independent Food Aid Network (2022) *People often talk about the cost of these support measures. But what's the cost of doing nothing?* Available at: <https://www.foodaidnetwork.org.uk/blog/charlotte-white>

⁶¹ University of Glasgow and the Poverty Alliance (2020) *How well is Universal Credit supporting people in Glasgow?* Available at: <https://www.povertyalliance.org/wp-content/uploads/2020/06/How-well-is-Universal-Credit-supporting-people-in-Glasgow.pdf>

⁶² Get Heard Scotland (GHS) helps people affected by poverty get their voices heard on the policies and decisions that most impact their lives. The programme is coordinated by the Poverty Alliance and funded by the Scottish Government as part of its Child Poverty Delivery Plan. For more information see - [Get Heard Scotland - The Poverty Alliance](#)

lack of clear information and guidance from Job Centre staff; and delays to responses on their online journal meant that they were reluctant to access training in case it reduced their payments. In this way, the administration of benefits is actively preventing people on low incomes from accessing the skills and training that would enable them to progress in the labour market.

Stigma

More work must be done to tackle poverty-related stigma. We provide secretariat to the Cross Party Group on Poverty in the Scottish Parliament and completed an inquiry into poverty related stigma in February 2023.

Poverty-related stigma is a process whereby individuals or communities are devalued because they live in poverty or access services which are designed to support people living on low incomes. It is complex, multi-dimensional and can be perpetuated through language, cultures, policies, institutions, and systems. This can have particular consequences on the design and administration of policies designed to support people receiving social security.⁶³

Negative assumptions about people living on low incomes have been used to justify policy changes and the under-resourcing of services. For example, submissions noted that stigmatising views of those living in poverty often formed part of the rationale for welfare reform by the UK Government. The resulting policy changes have undermined our social security safety net, impacting on awareness of support; how often support is awarded to applicants; and how easy it is to access. People on low incomes continue to experience shame about their situation as a result of these narratives, impacting the uptake of support including free school meals, debt advice and social security.

Our inquiry found that people who have applied for social security from the Department of Work and Pensions had experienced negative attitudes by staff citing feeling like they were not believed by staff. In particular, those participating in the inquiry noted issues surrounding the extensive burden proof of conditions for disabilities benefits. Glasgow Disability alliance gave an example of a consequence of this experienced by one of their members:

“It can be difficult if you have a hidden impairment – people think there is nothing wrong with you or you are “at it”. My adviser at the DWP actually said “this is not a disability”.

The impact of not being believed when applying for social security was a common theme in submissions to our inquiry. Glasgow Disability Alliance shared that their

⁶³ Cross Party Group on Poverty (2023) *An inquiry into poverty-related stigma in Scotland*. Available at: <https://www.povertyalliance.org/cross-party-group-on-poverty-report-of-inquiry-into-poverty-related-stigma-in-scotland/>

members often identify poverty-related stigma as a prominent source of lowered self-esteem and poor mental well-being. The process of having to reapply for multiple benefits and prove that they deserve the support makes individuals feel as though that are untrustworthy and generates feelings of shame and stigma. A submission from an individual stated:

“There are huge impacts on the health and mental health of disabled single mums, not only because we are never believed, but also because we live in such a precarious financial position.”

Central to effective administration of social security is a workforce that approach applicants with compassion and respect, rather than judgement. Whilst we believe that wider structural factors have a significant role in perpetuating this stigma, we believe that poverty awareness training for DWP administrators is necessary as part of building an efficient and functioning social security system.

What changes should be made to the administration of working-age benefits?

A key change to working age benefits should be the removal of the five week wait. Evidence from the Trussell Trust shows that the five week wait is a key component driving people to turn to foodbanks and emergency welfare provision.⁶⁴ This should be replaced with a non-repayable grant to cover living costs until the first award payment is made.

A further change should be the roll out of poverty awareness training should be rolled out to all administrative and assessment staff to protect claimants from the consequences of stigma and ensure adequate awards being made. Evidence from the CPG on Poverty’s inquiry into poverty-related stigma showed that negative experiences with staff administering social security and other public services could prevent them from returning to seek support and could also impact on decisions made by staff about eligibility for support.⁶⁵

Respondents to the Cross Party Group on Poverty’s inquiry into poverty-related stigma were keen to highlight that it is possible to design policies which actively challenge, rather than reinforce, poverty-related stigma. Throughout the submissions to this inquiry, the importance of introducing a “no-wrong door” approach to support; investing in benefit uptake programmes; automating benefits; and prioritising cash-

⁶⁴ The Trussell Trust (2019) #5 Weeks too long. Why we need to end the wait for Universal Credit. Available at: https://www.trusselltrust.org/wp-content/uploads/sites/2/2019/09/PolicyReport_Final_ForWeb.pdf

⁶⁵ Cross Party Group on Poverty (2023) An inquiry into poverty-related stigma in Scotland. Available at: <https://www.povertyalliance.org/cross-party-group-on-poverty-report-of-inquiry-into-poverty-related-stigma-in-scotland/>

first models were highlighted as best practice in minimising stigma. Moreover, Social Security Scotland's focus on dignity, respect and human rights was welcomed by respondents in actively challenging stigma in design and delivery.⁶⁶

Are there any particular groups who have been 'left-behind' in the design of working-age benefits policy?

Women

The design of social security is of particular importance to women's lives, as women are twice as dependent on social security as men as a result of their propensity to be primary caregivers for children and have wider caring responsibilities. As a result, women have been disproportionately impacted by more than a decade of cuts and restrictions to our social security system. The UN's Special Rapporteur for Extreme Poverty suggested *that "if you got a group of misogynists together in a room and said 'how can we make a system that works for men but not women?' they wouldn't have come up with too many other ideas than what's in place"*. The design of working-age benefits has entrenched, rather than challenged, gender inequality with factors such as single household payments; the earnings disregard; two-child limit; and the benefit cap having a disproportionate impact on women's financial security.

Young Parents

The choice to award lesser amounts to people under the age of 25 is driving up rates of poverty for young people, particularly parents. When looking at poverty rates in Scotland 55% of households where the mother was under 25 were in poverty in 2020.⁶⁷

Young people are paid a lower rate of Universal Credit and are more likely to be paid lower wages due to lower minimum wages despite having exactly the same living costs. The justification for this has long been that young people under 25 are more likely to live at home which still fails to accommodate for the significant numbers of young people who do move out. This has been coined the *young parent penalty* by many organisations including One Parent Families Scotland who have called for the Scottish Government to mitigate this through their flagship Scottish Child Payment.⁶⁸

⁶⁶ Cross Party Group on Poverty (2023) *An inquiry into poverty-related stigma in Scotland*. Available at: <https://www.povertyalliance.org/cross-party-group-on-poverty-report-of-inquiry-into-poverty-related-stigma-in-scotland/>

⁶⁷ The Scottish Government (2022) *Tackling child poverty delivery plan: fourth year progress report 2021-2022-focus report on households with mothers aged 25 or under*. Available at: <https://www.gov.scot/publications/tackling-child-poverty-delivery-plan-fourth-year-progress-report-2021-22-focus-report-households-mothers-aged-25-under/documents/>

⁶⁸ One Parent Families Scotland (2023) *Scottish Government told 'children can't wait' for young parent social security top-up*. Available at: <https://opfs.org.uk/get-involved/news-and-events/news/scottish-government-told-children-cant-wait-for-young-parent-social-security-top-up/>

We should not need the Scottish Government to mitigate for policies which serve no purpose other than plummeting young parents into poverty. Removing the differing rates for under 25's is the right thing to do to ensure adequacy for people of all ages and protect children and their families from poverty.

Scrutiny

What information should the Government publish to facilitate the effective scrutiny of benefit levels? How frequently should such information be published?

An effective scrutiny of benefit levels considers the poverty levels of people receiving benefits, the current costs of essentials and how these measure against benefit levels, and disaggregated data for different sub population groups. On disaggregated data, current poverty measures consider the populations in broad terms which fails to miss poverty experienced by smaller population groups. For example, available data relating to ethnicity utilises groupings that are often too broad to enable an understanding of how different groups experience poverty. An example of this in practice is that current categories can obscure the impact of poverty on Polish communities as they are grouped within British White (other). We also remain some distance from having sufficient data to conduct intersectional analysis. This data should be published annually and decisions on increases to benefit levels should be based on this evidence.

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