

# Tackling Child Poverty Delivery Plan 2026 – 2031

## Citizens Advice Scotland response

### March 2025

---

#### Key points

- Citizens Advice Scotland (CAS) is supportive of key strategic themes and welcomes the Scottish Government's recognition of the interconnected nature of the challenges and solutions associated with tackling child poverty
- The CAS network provides a vital service delivering life-changing advice to families. Our network provides unique insight into the challenges faced by families at the greatest risk of poverty; it is essential that this work is adequately resourced
- Our evidence shows the importance of addressing problems that households are facing as far up stream as possible. Measures such as a social tariff for energy and a Minimum Income Guarantee are needed to address deeply rooted issues of child poverty and inequality
- The Scottish Child Payment (SCP) is having a positive impact on households facing multiple pressures, this is supported by evidence from across our network. The relatively light administrative burden associated with SCP has helped ensure high levels of take-up
- Our evidence demonstrates the harm caused by the two-child limit policy. We are supportive of mitigation proposals and believe that such measures will play an essential role in tackling child poverty.

#### Introduction

CAS welcomes the opportunity to provide our views on the Tackling Child Poverty Delivery Plan 2026-2031. In the past year, Citizens Advice network in Scotland has provided 187,000 people with advice and assistance. Our work has put £142m back into people's pockets and local communities. Our network sees the effects of child poverty on a daily basis, and the majority of advice provided by Citizens Advice Bureaux in Scotland is regarding issues related to social security. Insufficient household income is the immediate fundamental driver of child poverty.

#### Key Strategic Themes

CAS is supportive of the key strategic themes. Many aspects of the themes are encouraging. CAS acknowledges the crucial role of paid employment in providing a route out of poverty. However, we know that people that are in-work are relying on social security payments to survive. About one third of people claiming means-tested Universal Credit are in-work. Work is not a guaranteed route out of poverty. Essential infrastructure like childcare and transportation will provide essential support to enable people, particularly those with caring responsibilities, to access and progress in the workplace. The role of transport is also key in supporting people who live in rural or remote areas. Our evidence shows that people in these communities face barriers to accessing social

security entitlements, such as the cost and logistics of travel to advice providers. Janet's<sup>1</sup> experience below demonstrates that low pay, precarity and access to childcare are some barriers to using work as a route out of poverty. It also shows that employer flexibility is important.

### Janet's experience

*Janet is currently on maternity leave, and she is due to return to work soon. She is a single mum of four young children. She attended a CAB seeking advice because she is struggling to sustain employment due to the care needs of her disabled son. Her son has been diagnosed with learning difficulties. He attends nursery, but is not yet settled, and Janet is frequently called to take him home due to the levels of distress he displays. Janet is keen to stay in her job as a learning support assistant, but her employer cannot give her the flexibility that she needs. She currently receives the low rate of the care component of Child Disability Payment. She is seeking a review of this award, with the aim of having it raised to the middle rate. This would qualify her for Carer Support Payment. However, she would not be better off with the Carer Support Payment, as that benefit would be considered as income for the purposes of calculating Universal Credit entitlement. Janet would be subject to the two-child limit, although her entitlement to disabled child element would not be affected by it.*

CAS welcomes the Key Strategic Theme on social security and its role in allowing families to meet their basic needs and live dignified lives. The purpose of a social security system must be to support everyone to live with dignity, and to engender tangible individual and collective hope of a better future. It should be both a safety net and springboard that any of us can access at any point to support us through the challenges of life, unlock potential and help us move forward.

In our view, the Key Strategic Themes should have a greater emphasis on the role of accessibility and inclusion in the delivery of social security payments. Administrative simplicity is fundamental to the levels of uptake associated with the Scottish Child Payment. There are valuable learnings that can be taken from this approach, and we encourage Social Security Scotland to continue to apply these, particularly in their work to mitigate the two-child limit.

### **Advice Services**

CAS welcomes the Key Strategic Theme that recognises the importance of the advice sector. Citizens Advice Scotland, our 59 member Citizen Advice Bureaux (CABs) and the Extra Help Unit, form Scotland's largest independent advice network. The CABs provide free and confidential advice, including accessing entitlements, support with social security applications and appealing decisions. SSS Client Satisfaction Survey found one in five of those who received support from April to September 2024 received it from the CAB network.

Our CABs provide data and evidence about the people that they support and the problems they experience. In this way, our network provides unique insight into the challenges being faced by families at the greatest risk of poverty. This includes identifying long-standing issues that are worsening, and new problems that are emerging.

---

<sup>1</sup> All names have been changed for privacy reasons.

During 2023/2024:

- > The CAS network supported people to over £158 million in financial gains; the highest proportion of which were social security related (82%)
- > Nearly a third (31%) of people we helped were in the most deprived income quintile
- > 20% of people who accessed support from us lived in a household with children
- > Social security represented 44.5% of the advice work undertaken by CABs

Most third sector organisations, including our network of CABs, receive funding on an annual basis. This means that every year they are faced with uncertainty about whether their funding will be renewed. This places immense stress on CAB staff, whose livelihoods are often marked with precarity and at the mercy of short-term funding cycles.

This puts CAB advisers in a difficult position of providing support to people going through financial crisis whilst facing job insecurity themselves. Meanwhile, CABs across Scotland continue to experience record-breaking demand and complex advice needs. Despite these circumstances, we know that our advice is changing lives: in 2022-23 70% of people reported the advice they received improved their mental health and wellbeing. 91% felt the support they received increased their confidence in dealing with issues in the future.

The CAS network is helping to end child poverty in Scotland by providing supporting families to navigate the complex social security system, understand and claim their entitlements. It is essential that advice services, such as ours, are adequately resourced to enable uptake, maximisation and efficacy of social security, but also to gather evidence and report on the real-life impact of policies in practice. Long-term and secure funding would provide job security to our advisers, retaining knowledge and expertise that is trusted in communities across Scotland.

## Scottish Child Payment (SCP)

SCP represents vital cash support, giving parents and carers the dignity of choice over how to provide for their children. Taking a cash first approach is crucial to the success of tackling child poverty. Evidence is emerging that in Scotland child poverty rates are diverging from the rest of the UK, implementation of SCP is a key contributor.

- > The Citizens Advice Network supported 2,311 people with SCP advice in the first and second Quarter of 2024/2025 financial year
- > In Quarter 3 (Q3) of 2024/25, 76% of people accessing SCP advice were women
- > In the same Quarter, 33% of those we supported in relation to SCP are couples with one or two children, 40% are single parents
- > In the same Quarter of those we supported with SCP 20% are in full-time employment, 19% in part-time employment and 17% are unable to work due to ill health or disability.
- > Also in Q3 of 2024/25, 61% of those seeking advice on SCP reside in the most deprived areas of Scotland, SIMD 1 & 2

Our advisers have reported on the positive impact of the SCP on households facing multiple pressures. For example, a West of Scotland CAB reports of relief that the SCP provided to a parent who faced unexpected unemployment and marital breakdown and found himself the sole carer for three children aged 5, 9 and 15. A South of Scotland CAB observed that parents of young children had been less affected by food insecurity; the CAB attributed this to the SCP.

The administrative process associated with accessing a social security payment has a significant impact on take up and efficacy. The estimated take-up rate for children aged under 6 in 2023-24 was 97%.<sup>2</sup> The relatively light administrative burden associated with SCP seems likely to be contributing to this. The simplicity of the payment also appears to be reflected in the fact that Scottish Child Payment represents just 2% of the CAB network's social security advice caseload, and just 3% of SCP inquiries that we handle relate to re-determinations and appeals.

However, there remain areas for improvement. For example, demonstrating responsibility for a child can cause delays and can be especially challenging for those for whom English is a second language, those with limited digital access or literacy, and those going through relationship breakdowns. The Citizens Advice network in Scotland supports many people (like John, whose experience has been included below) who struggle to extract and upload evidence of receipt of child element from a Universal Credit claim, or who are experiencing language barriers to progressing a claim.

### John's Experience

*John visited his local CAB in East of Scotland seeking assistance as his former partner is continuing to receive Child Benefit and Scottish Child Payment in respect of his two children. John is the resident carer and his former partner has very little contact with the children. Both applications were made at the same time, however HMRC claim that they have not received John's application. The application was posted from the CAB office including two supporting letters. SSS advised that they cannot make any changes to his ex-partner's claim or process a new claim until they receive confirmation of Child Benefit.*

John's experience demonstrates the need to explore greater variety and simpler ways of evidencing responsibility, such as social work communications, school enrolment or GP practice confirmation. This is especially relevant in the case of domestic abuse, including coercive control and financial abuse.

Susie's experience below underlines the role of an emergency domestic abuse cash payment system in addition to Child Benefit and the Scottish Child Payment.

### Susie's Experience

*Susie is a lone parent to three children aged 10, 5 and 4 years, who visited a West of Scotland CAB seeking help to access benefits pertaining to her children. Susie has dyslexia, sciatica and poor mental health, she is not able to work at the moment and has just applied for Universal Credit. She requested a change in the nominated parent in respect of Scottish Child Payment, Child Benefit and Child Disability Payment. They are currently in her former partner's name. Susie advised that, when she left the relationship, her former partner was self-employed and in complete control of the household finances. While she is unable to access the additional financial support, she is struggling to meet the needs of her children and herself.*

## **Two Child Limit Mitigation**

During 2024, 3% of those that our network supported with advice about Universal Credit were part of a couple supporting three or more children. 17% were lone parent households which may include three or more children. During the same time period, 3% of those we supported with advice on food insecurity were part of a couple supporting three or more children, and 20% were lone parent households that

---

<sup>2</sup> [Take-up rates of Scottish benefits: November 2024 - gov.scot](https://www.gov.scot)

may include three or more children.<sup>3</sup> In April 2024, one in two households affected by the two-child limit were lone parent households.<sup>4</sup> Reflecting these trends, analysis by the Scottish Government reveals the extent to which households with three or more children and lone parent households are disproportionately living in relative and absolute poverty.<sup>5</sup> Mitigating the effect of two child limit will have a significant positive impact on children in Scotland.

CAS believes that, on balance, the most effective way to introduce a new payment to mitigate the two-child limit would be through secondary legislation, using the powers to top up a reserved benefit in Section 79 of the Social Security (Scotland) Act 2018. This was the approach taken with the introduction of SCP, and we would support a replication of this process. Consideration should be given to any knock-on effects of any steps taken to mitigate the two-child limit. For example, identifying a mechanism for delivery that avoids the funds being treated as “income”, as this could impact on people’s UC entitlement. Additionally, it could reduce entitlement to Council Tax Reduction and other locally delivered support or push people into the overall limit.

Significantly, mitigating of the two-child limit does not remove the pernicious “non-consensual conception” exception. This exception fails to protect women trying to leave an abusive relationship. It risks unwanted disclosure and does not account for nuances such as where it is an older child who was conceived in abusive circumstances. CAS recognises the challenge that Scottish Government faces with mitigating the effects of this reserved policy. We urge Scottish Government to work with the UK Government and explore routes to counteract the harmful effects of this policy.

Restoring equal provision of support for all children is urgent and essential. It must be acknowledged however, that even if implemented at speed, mitigating the two-child limit is constrained in what it can achieve for our children in the absence of fundamental reform of the wider social security system.

## **Reserved social security is impacting on child poverty in Scotland**

Many people are facing barriers due to the design features of qualifying benefits. These include, but are not limited to:

- > the lower rate of the foundation Universal Credit payment (known as the standard allowance) for younger parents
- > the five-week wait
- > the treatment of weekly, fortnightly and four-weekly pay, which can leave people without benefit income on the four months of the year that have five-weeks
- > the treatment of Maternity Allowance as a fully deductible benefit rather than income
- > the treatment of student funding as unearned deductible income

---

<sup>3</sup> These are proportions of individuals who received advice and provided information about their households’ composition

<sup>4</sup> [Universal Credit and Child Tax Credit claimants: statistics related to the policy to provide support for a maximum of two children, April 2024 - GOV.UK](#)

<sup>5</sup> [Additional child poverty analysis 2024 - gov.scot](#)

Receipt of Maternity Allowance or student income can prevent access to Universal Credit and therefore Scottish Child Payment. This can act as a disincentive to work and restrict the capacity of parents to accessing education that could help them to access higher quality work.

#### Samantha's experience

*Samantha sought advice from a Central Scotland CAB regarding eligibility for social security. Samantha was no longer receiving UC. This is because she applied for Maternity Allowance, which was awarded and backdated, which raised her income higher than the UC standard allowance and Child Element. Samantha does not have housing costs as she lives with her mother. Samantha's SCP will cease since she is no longer in receipt of a qualifying benefit. Maternity Allowance is worth just £156 a week to meet the needs of both mother and child.*

Reserved, devolved and locally delivered social security entitlements are profoundly entangled. This means that during transitions from one form of social security to another – even small changes in circumstances – can result in a sudden loss of entitlement to lifeline support such as Council Tax Reduction, free school meals and the school clothing grant. It is important the resources are dedicated to improving intra-agency information sharing, and streamlining the claim management process, for example with the use of automated population of claims forms.

#### Brian's experience

*Brian approached his local CAB for advice on his social security entitlement. Brian is a carer for his partner and their four children. Until recently he was in full-time employment, but he had to give this up to fulfil his caring responsibilities. He has claimed Universal Credit. His wife is not yet in receipt of Scotland's ADP due to uncertainty around the duration of her current health circumstances. This means that Brian is in a position in which he cannot access any additional support for the household and will be expected by the Department of Work and Pensions to look for full-time work until his partner is able to access ADP. The household will only receive support for two-children. Meanwhile, he will have to apply to his local authority for support with Council Tax liability and the children's schooling.*

### **Social Tariff and Minimum Income Guarantee**

Child poverty is a complicated issue that does not exist in isolation, it is interconnected with broader issues that are impacting on families, such as rising energy bills or council taxes. It is important to consider where the impact of payments like SCP is limited and what other measures could be taken to fully realise the positive difference that this payment could make to families. For example, unaffordable energy costs have had a devastating impact on family finances and in many instances SCP payments are being used to service growing energy debt. A social tariff for energy targeted at households on low incomes would make energy much more affordable and significantly help to provide financial stability for one of the most essential expenses that we all have. This reflects the need to tackle the issues that households are facing as far up stream as possible, at the root cause. The SCP should not be used to mitigate failures elsewhere.

CAS is committed to building a UK wide "cradle to grave", fluid, social security system designed to deliver a Minimum Income Guarantee (MIG). A system which ensures that everyone has enough money to allow them to live a dignified, healthy and financially secure life, whatever their circumstances. A MIG would be targeted at those falling below an income threshold, reflecting varying household needs. Implementing a MIG could deliver transformative change, reducing

inequality and ensuring that people visiting our CABs have more security and opportunity. A MIG would lessen the burden on other public services by alleviating demand caused by the social, physical and mental impact of poverty. The Minimum Income Guarantee Expert Group, which CAS is a member of, will shortly publish its final report. We urge the Scottish Government to take forward the report recommendations including those laid out in the road map.

---

## **About Citizens Advice Scotland**

Citizens Advice Scotland (CAS), our 59-member Citizen Advice Bureaux (CAB) and the Extra Help Unit, form Scotland's largest independent advice network. Scotland's Citizens Advice Network is an essential community service that empowers people through our local bureaux and national services by providing free, confidential and independent advice. We use people's real-life experiences to influence policy and drive positive change. We are on the side of people in Scotland who need help and we change lives for the better.