

# Citizens Advice Scotland Response to Scottish Commission on Social Security call for views on draft Two-Child Limit Payment (Scotland) Regulations

## August 2025

### Background

Citizens Advice Scotland (CAS), our 59 member Citizen Advice Bureaux (CABs) and the Extra Help Unit (EHU) together form Scotland's largest independent advice network. We deliver front line advice services in over 300 locations across the country. We provide essential social security advice to one in two of the people attending our CABs.

We look forward to being core to both the communication and successful delivery of the mitigation of the two-child limit. Evidence from our network shows that this policy has the potential to transform the life chances of many children experiencing poverty.

#### *The impact of the two-child limit*

63% of those that we supported with advice about Universal Credit (UC) in the three months from April to June 2025, were living in the most deprived areas in Scotland as measured by the Scottish Index of Multiple Deprivation (SIMD 1 and 2). These are households facing multiple barriers to increasing their income and who are struggling to meet their basic needs. This is reflected in the fact that, in the winter of 2024-2025, one in two of those that we supported with energy advice alongside other advice needed social security advice.

For lone parent and larger families, the picture is stark. During 2024, we provided advice related to food insecurity to 305 people who were part of a couple supporting three or more children. By contrast, we supported 48 people with food insecurity advice who were recorded as being part of a couple supporting one child. During the same period, we provided advice on food insecurity to 2039 lone parents (including lone parent households with three or more children). In April 2025, over one in two households affected by the two-child limit were lone parent households<sup>1</sup>. Combined, this data demonstrates the greater demand for food insecurity advice from larger families, and consequently the essential role that the Two Child Limit Mitigation Payment will have in enabling families to meet their basic need.

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>2</sup>. The impact of removing the two-child limit on child poverty is therefore certain to be profound.

#### **1. The regulations do not allow backdating of the Two Child Limit Payment. What issues could this create for your clients?**

We are concerned that the lack of backdating will disproportionately impact on: those experiencing relationship breakdown, including victim survivors of domestic abuse; sick and disabled people

facing barriers to claiming; and those facing administrative delays in relation to a qualifying payment.

### Separation and relationship breakdown

Universal Credit operates based on a household payment being deposited to a nominated bank account. When relationships breakdown and couples become single claimants, the process for ensuring that the appropriate parent is receiving all relevant payments connected with responsibility for children can be protracted. This is demonstrated by Niall's experience below:

*Following a break-down of his relationship, Niall became the primary carer of his two children. Despite Niall receiving Child Benefit in respect of both children, there were significant delays in verifying his eligibility for UC Child Element. This was eventually rectified with the help of a CAB adviser. Niall is still facing difficulties updating his Housing Element, which covers only 50% of his rental liability, since his original tenancy agreement was a joint one. Niall has been left struggling financially and psychologically, which is having a negative impact on the children.*

Niall's experience highlights the importance of clear communication with parents regarding applications for a Two Child Limit Mitigation Payment. For example, clarifying that applications can be made if eligibility criteria are likely to be met within the subsequent fourteen days<sup>3</sup>. Additionally, in the event of a refusal to make an award of a Two Child Limit Mitigation Payment, a fresh determination of eligibility can be made without application where a backdated award of Universal Credit is subsequently made<sup>4</sup>.

### Health and disability

In other instances, delays in application can occur due to challenging practical, social and psychological barriers. We would support the recognition of these types of barriers in backdating provisions of the Two Child Limit Mitigation Payment in a similar manner to the backdating provisions currently applicable to complex Scottish social security payments such as Adult Disability Payment (ADP).

Unfortunately, the backdating provisions for ADP are still not fully comprehensive. This has been detrimental in some cases for young disabled people transitioning from Child Disability Payment (CDP) to ADP who were unable to complete an ADP application before their eighteenth birthday. We believe that existing legislation could be used to address this, but at present there is a hard deadline presented by a young person's eighteenth birthday.

Tracey's experience detailed below demonstrates the impact of this, providing a window into challenges being faced by households with disabled children. It is imperative that backdating provisions for the Two Child Mitigation Payment recognise and account for these barriers from the offset, to avoid harm and the need to retrospectively amend regulations.

*Tracey was referred to her local CAB having presented at a foodbank with just four pence left in her account. Tracey is a full-time carer for her son and had until recently been in receipt of Carer's Allowance and CPD (on behalf of her son). Both payments ended when her son turned eighteen. Tracey has complex health needs and has found managing social security administration overwhelming. The situation has caused her acute financial and*

*psychological distress. The CAB supported Tracey to apply for ADP on behalf of her son. The CAB also contacted Social Security Scotland (SSS) and DWP's Advanced Customer Support Service Lead to urgently highlight the safeguarding concerns and the risk to Tracey's son.*

Analysis by the Department of Work and Pensions of UK wide data indicates that nearly three in ten (28%) of households affected by the two-child limit include at least one disabled child<sup>5</sup>. Four in ten (40%) of households affected by the policy had at least one member in receipt of a health and disability related payment in April 2025. In Scotland (in April 2025), the number of individual children living in two child limit impacted households with a disabled child element included in the relevant UC award was 34,040<sup>6</sup>. This shows that many households with disabled children will be impacted by the Two Child Limit Mitigation Payment, further highlighting the need to ensure adequate backdating provisions.

### Administrative delays

There could be multiple reasons for delay in bringing a qualifying benefit into payment. They typically include challenges with obtaining and successfully submitting relevant documentation (advisers report that verifying identification digitally can require multiple attempts).

People with complex health needs undergoing a managed migration to Universal Credit, and those for whom English is a second language, can be particularly vulnerable to such difficulties.

*Zia, who speaks English as a second language, is settling in the UK under the Afghan Citizens Resettlement Scheme. He had applied for Universal Credit and was advised by Job Centre Plus that a National Insurance (NI) number would be issued automatically. After four weeks, Zia was informed by Job Centre Plus that he would in fact need to make an online application for an NI number. This delay has impacted on the Zia's access to Scottish Child Payment. The process has been overwhelming for Zia, and since backdating does not apply to Scottish Child Payment the financial losses resulting from the delay will be considerable.*

### CAS solution

We note that Scottish Child Payment allows up to four weeks backdating if a person is already receiving it on behalf of another child<sup>7</sup>, for consistency this should be mirrored in the Two Child Limit Mitigation Payment. Such an amendment is, however, a minimum and CAS would support the extension of backdating beyond four weeks in exceptional circumstances, both in the Two Child Limit Payment (Scotland) Regulations and looking forward to future Scottish Childhood Assistance legislation.

2. **Eligibility for the Two Child Limit Payment will require the child or young person to be included in the claimants Universal Credit claim. Do you have examples of where there has been an error or delay in including a third or subsequent child on a Universal Credit claim? Are there specific types of cases where this is more likely to happen?**

### Managed migration from legacy payments to Universal Credit

At an earlier juncture in the roll out of managed migration to Universal Credit, our advisers reported extensively on delays in verifying eligibility for Child Element, and the devastating impact that this was having. Jill and Jacqueline's experiences below are characteristic, and relevant to Two Child Limit Payment (Scotland) Regulations, given how closely these mirror Scottish Child Payment operationally.

*Jill approached her local CAB having received a letter to state that her Scottish Child Payment award will be coming to an end. Jill is a lone parent of a 9-year-old child. She has recently migrated from Tax Credits to UC but has not yet received her first payment of UC including Child Element in respect of her daughter. Jill is self-employed, earning around £400/month, while cares for her terminally ill mother. The experience of migration has been highly disruptive and stressful in the context of already highly strained circumstances.*

*Jacqueline is a single parent, working part time and living in private rented housing. Her two children, aged 6 and 16, are both in full time education. Jacqueline received a Migration Notice to move from Working Tax Credit / Child Tax Credit to UC. She included the details of both children in the UC claim when she applied. The overall UC award was £0 since the children's identification had not been verified and no Work Allowance was included, meaning 55 % of Jacqueline's income was accounted for in assessing her eligibility. Jacqueline is in severe financial difficulty; she has had to borrow money to feed her children. With the help of a CAB she was able to obtain an appointment at a Job Centre Plus to verify the children's ID in person.*

While scenarios like these have become significantly less prevalent, errors and delays in relation to Child Element do occur, regardless of the specific circumstances in which a Universal Credit claim is made.

*Anna reported an error to the DWP in relation to the amount she was receiving in Child Element in April 2025. By August 2025 the matter had still not been resolved, despite multiple attempts, and Anna sought the help of her local CAB. The DWP subsequently acknowledged the error, recognising that Anna was owed backdated sums but nonetheless advised her that the case has been passed to a decision maker and that no timescale could be provided for a resolution. Anna is also facing delays in securing an accurate Council Tax Reduction award, partly linked to this dispute. This ongoing issue has caused months of severe anxiety and disruption to Anna and her family.*

### Confusion about eligibility

Our advisers explain that they are supporting people who have been missing out on Child Benefit and/or Scottish Child Payment due to confusion about eligibility for these payments in respect of third or subsequent children. How this confusion occurs, particularly where communication barriers are present, is illustrated by Sam's experience below:

*Sam is a self-employed taxi driver; he speaks English as a second language and requires some interpretation support. He lives with his partner, who is a part-time student, and their*

*three children. The couple are in receipt of UC; they receive a standard allowance and child element for two children. Sam attended the CAB for support to apply for Council Tax Reduction. While providing this support, it became evident to the CAB that Sam and his partner are only receiving SCP for two children; until advised otherwise by the CAB, Sam had understood that SCP was also subject to the two-child limit.*

This is also reflected in CPAG’s Strengthening Social Security project, which found that some families do not claim Scottish Child Payment or Child Benefit for third and subsequent children because they mistakenly believe the two-child limit applies to those benefits as well<sup>8</sup>.

The evidence then highlights the pivotal role that communication will play in the success of this policy.

### CAS Solution

A combination of inclusive and clear communication, a streamlined application process and the introduction of flexible backdating provisions will be essential if the impact of delays on the two-child limit mitigation payment is to be minimised. Access to in-person support through social security agencies and advice networks will play a significant role, raising awareness, supporting the identification of potentially eligible households and providing the practical help families need to navigate the application process. Advice services need to be adequately resourced to do this.

3. **In some circumstances both parents could make a claim for Two Child Limit Payment and Social Security Scotland will have discretion to decide which applicant is entitled to the payment. What should Social Security Scotland consider when making such decision? A similar rule applies to Scottish Child Payment, are you aware of any issues that have arisen from this?**

Given the delivery of Universal Credit as a household payment to a nominated bank account, this scenario could arise when those with parental rights and responsibilities are not living as a couple.

In general, demonstrating responsibility for a child can cause delays. This can be especially challenging for those for whom English is a second language, and those with limited digital access or literacy difficulties. Further hurdles can be encountered by those going through relationship breakdowns, including victim survivors of domestic abuse.

The CAB network supports many people who either struggle to extract and upload evidence of receipt of Child Element from a UC claim, or experience barriers to verifying a UC claim.

*Michael sought the assistance of his local CAB as his former partner is continuing to receive Child Benefit and Scottish Child Payment in respect of his two children, although Micheal is now the resident carer and his former partner has very little contact with the children. HMRC claim that they have not received the application for Child Benefit. The application, which included two supporting letters, had been posted from the CAB office. SSS advised that they could advance the Scottish Child Payment application without evidence of responsibility for the children. Michael is facing financial hardship and worried about the effect this will have on his children.*

This illustrates the potential value of exploring a wider variety of evidence, 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. Jane's experience underlines the role of flexibility.

*Jane is a lone parent to three children aged 10, 5 and 4 years. She sought help from her local CAB to access her children's social security entitlement. Jane is living with dyslexia, sciatica and poor mental health; she is no longer working having fled an abusive relationship. She requested a change in the nominated parent in respect of Scottish Child Payment, Child Benefit and Child Disability Payment, which are currently in her former partner's name. Janet 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 additional financial support, she is struggling to meet the needs of her children and herself.*

### CAS solution

We support the roll out across Social Security Scotland of trauma informed training, giving all staff in the agency tools to identify and help to support those experiencing abuse.

CAS supports flexibility concerning the range and type of evidence that can be accepted to establish responsibility for a child. This has the potential to transform decision making where disputes arise, facilitating speedy and appropriate outcomes. This approach could be helpful in considering cases in which both parents have substantial caring responsibilities for a child while maintaining separate households. It would enhance the efficacy of the existing comprehensive guidance that exists in respect of disputes concerning Child Disability Payment<sup>9</sup>.

The best interests of the child should be the anchoring principle behind decision making (as outlined by the UN Convention on Rights of the Child, Article 3).

4. **Only people getting Universal Credit will be eligible for the Two Child Limit Payment. Are you aware of any situations where someone may be impacted by the two-child limit, yet not be entitled to Universal Credit, therefore not be eligible for a Two Child Limit Payment? What are the impacts of them not being eligible for the Two Child Limit Payment?**

We are concerned about recipients of Maternity Allowance and those whose Universal Credit awards are intermittent due to the nature of their earnings.

### Maternity Allowance

Some mothers in receipt of Maternity Allowance will not be eligible, namely: those who do not have housing costs, are in temporary or supported accommodation, or who have more than two children. Sarah's experience below illustrates the challenge.

*Sarah is living in temporary accommodation with her three young children following the break down in her relationship due to domestic and financial abuse. Sarah receives Housing Benefit and Council Tax Reduction; she attended her local CAB because she was denied a UC award. Sarah's Housing Benefit entitlement leaves her with a shortfall of £29/month rent to*

*meet. Rent arrears of more than £1000 have accumulated dating from when Sarah's former partner resided with her. Sarah's only income is Maternity Allowance; the CAB confirmed that Sarah was not entitled to UC. As Sarah is not in receipt of a qualifying benefit, she cannot access Scottish Child Payment. Sarah is in acute financial hardship and has been using her credit card to pay her energy bill. The CAB supported Sarah to apply for Best Start Grant and Best Start Foods and a Discretionary Housing Payment to temporarily cover the housing costs shortfall. Additionally, they signposted her to the TSB Bank domestic abuse account, and referred her for specialist support with her energy supplier.*

### Fluctuating incomes

42% of those that we provided with advice about Scottish Child Payment in the three months from April 2025 were recorded as being in work (part-time, full-time or self-employment). Over half (59%) of households affected by the two-child limit are in work<sup>10</sup>.

People who have inconsistent entitlement to UC due to fluctuating earnings are at particular risk of missing out on the Two Child Limit Mitigation Payment. This is because a loss of UC entitlement, however temporary, will present as a nil award for the purposes of an assessment period – which would directly impact on eligibility for Two Child Limit Mitigation Payment. UC entitlement can be inconsistent because of the frequency of earnings (those paid weekly, fortnightly or four-weekly pay, are affected in the four months of the year that have five-weeks because they appear to have been paid multiple times in one assessment period).

The impact in respect of household finances, the ability to budget and meet basic needs, and an increased administrative burden on stressed households, is significant. In most cases, multiple interacting financial and social pressure points are present in these households. Fluctuating UC entitlement frequently impacts on entitlement to Council Tax Reduction and can impact on entitlements to lifeline support such as school meals and school clothing grants.

*Ruth is a lone parent to three children. She works part time; her earnings are supplemented with Universal Credit. Ruth is paid four weekly; she receives thirteen wages in a year. Thus, Ruth receives a nil award of UC on one month of each year, plunging her into hardship each time that it occurs. Ruth sought the support of her local CAB as her eldest child is due to leave education, meaning Ruth will lose Scottish Child Payment and Child Benefit while facing an increased Council Tax and rental liability due to the presence of a "nondependent" in the household. Ruth is very worried about having enough money to meet the needs of her children.*

### The impact of administrative errors

The risk, and potential impact, of errors in the information being provided by HMRC about earnings is illustrated by Nicole's experience.

*Nicole, a single parent of two dependent children, attended her local CAB in distress. She did not receive an expected payment of UC in January 2025. It transpired that her employer had reported all weekly earnings since September 2024 as having been paid in the last month. She works part-time and is paid weekly. Her employer had failed to notify her wages to HMRC for a period of 4-5 months, but when they were reported, they were taken as having*

*been received as a lump sum. She is facing a month without UC, leaving her with less than £200 in earnings a week plus Child Benefit to support the household. She will have to meet rent of £519 a month from this income. The CAB urgently supported Nicole to restore her UC and re-establish her SCP.*

### CAS Solution

CAS are pleased that the draft Two Child Limit Mitigation Payment Regulations allow an award to be re-established without a new claim in circumstances in which a two-child limit payment ends due to a break in receipt of UC. This will apply if parents and carers have been in receipt of the payment during the previous three months<sup>11</sup>. This will need to be well communicated to ensure eligible parents and carers can benefit.

Consideration should be given to treating a deduction from UC related to receipt of Maternity Allowance on an equal footing with deductions related to sanctions and debt recovery in the draft Two-Child Limit Payment Regulations. This would look like the below in the Regulations:

*(2) In sub paragraph (1) (b), the reference to "the sum awarded" means, in a case where a deduction has been made— (a) in respect of any liability the individual has to another person, or (b) by way of a sanction, (c) in respect of unearned income identified as Maternity Allowance, the sum that would have been awarded had the deduction not been made.*

5. **People who are exempt from the two-child limit will not be eligible for a Two Child Limit Payment. Are you aware of any situations where someone would be better off applying for an exemption, rather than the Two Child Limit Payment? Are you aware of any situations where someone would be better off applying for the Two Child Limit Payment rather than applying for an exemption from the two-child limit? What information and/or support may be needed for claimants to make this decision?**

Households who are on the edge of losing UC in the event of an increase in earnings may be better off applying for an exemption. This is because additional Child Elements will raise the threshold at which they lose entitlement to UC, meaning that they will be able to earn more without losing UC<sup>12</sup>

This is especially relevant given that the Administrative Earnings Threshold (which determines whether a claimant commitment involves full work search requirements or is lighter touch) has increased three times since 2022.

If someone is granted an exception while there is a Transitional Element<sup>13</sup> included in their UC award, an additional Child Element would erode the transitional amount. In this instance a household would be better off applying for a Two Child Limit Mitigation Payment. The number of people in this situation is significant. Of the 961,196 UK households sent migration notices between July 2022 and March 2025, 490,988 were awarded Transitional Element<sup>14</sup>.

In the three months from April to June 2025, we provided 19,126 pieces of advice about managed migration. 18% of that advice concerned transitional protection. This is one of the key areas on which people are seeking managed migration advice, comparable to advice about what to do when a migration notice is received (which described 19% of the advice that we provided). 4% of the

managed migration advice that we provided specifically concerned the erosion of transitional protection.

### Non-consensual conception

This pernicious exception, which requires victim survivors to disclose, re-tell and evidence especially traumatic abuse, has no place in the provision of social security designed to meet the needs of children. We therefore welcome the decision that potential beneficiaries of the Two Child Limit Mitigation Payment will not be required to first qualify for an exception.

In April 2025, 26,300 households claiming Universal Credit had at least one exception to the two-child limit policy, but just 3,670 households (14%) were excepted based on non-consensual conception<sup>15</sup>. This indicates how few people are accessing this specific exception. The barriers to doing so are daunting, including the administrative burden associated with evidencing eligibility.

*Julie attended her local CAB for advice about her Universal Credit award. Julie is a lone parent of three children aged 12, 10, and 4. Julie is subject to the two-child limit; her UC award is subject to deductions to repay an advance and to reflect income from Child Maintenance (£36.40). She fulfils the criteria to be awarded Child Element for her third child based on the non-consensual exception. Julie explained to the CAB that she had advised the DWP of the background, but the form that she must complete to evidence the abuse was not issued at the time, so Julie has been missing out on a Child Element for her third child for four years. Julie lives with several health conditions, she has been experiencing severe financial hardship, her health has deteriorated, and she has struggled to maintain her connection to her other children currently living with their father.*

### Kinship carers

While some households are eligible for an exception while in an informal arrangement, in most cases kinship carers would be required to enter into a formal kinship care arrangement through the local authority to access an exception. Such a complex decision is influenced by factors such as the kinship carer's relationship to a child's biological parents.

*Richard and his partner Angela attended their local CAB for advice. The couple are in their 60s and juggling fulltime work with caring for their 13-year-old granddaughter. The couple have not received any formal financial support for their granddaughter's care. Their granddaughter's mother is in receipt of social security payments pertaining to her daughter, but forwards very little of these funds to the couple. Without a formal kinship care arrangement, the couple are not receiving adequate financial or practical support from social services, despite bearing the responsibility for their granddaughter's upbringing.*

Kinship carers are a group facing extraordinarily challenging circumstances. Effective communication and simplicity of access will determine the extent to which they are able to benefit from the Two Child Limit Mitigation Payment. Although Lesley would not benefit from the payment, her circumstances underline the importance of such an approach.

*Lesley lives alone and acts as kinship carers for her two grandsons aged 10 and 11 years old. She attended her local CAB for support to apply for Universal Credit. Lesley has significant health issues, including lymphoedema and mental health conditions. Additionally, one of her*

*grandsons has been diagnosed with autism and foetal alcohol syndrome, and both children have suffered trauma. Lesley received a managed migration notice but was overwhelmed by the process of migrating to UC, encountering difficulties navigating online processes and gathering required information. Furthermore, her status as a kinship carer created additional complications, as it was unclear whether she was entitled to child and disabled child elements within UC. The complexities of the system left Lesley stressed and anxious. Over the course of several weeks, she struggled to make a successful application, requiring multiple phone calls, a three-hour face-to-face appointment at her local CAB, and continued communication to clarify her entitlements.*

## **6. In general, what lessons can be learnt from the Scottish Child Payment in the delivery of Two Child Limit Payment?**

Scottish Child Payment (SCP) provides vital cash support, giving parents the dignity of choice over how to provide for their children. Since insufficient household income is the fundamental driver of child poverty, a cash-first approach is foundational to the success of a wider strategy.

At Citizens Advice Scotland (CAS) our data is beginning to reveal the impact. The proportion of households with children receiving food insecurity advice decreased by 10% over February to March in the financial year 2023-2024. In the same period the previous year it increased by 29%. This shift coincides with the expansion of Scottish Child Payment (SCP).

SCP has a very high take-up rate; the estimated take-up rate for children aged under 6 in 2023-24 was 97%<sup>16</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 SCP represented just 1% of the CAB network's social security advice caseload in the three months from April 2025. Furthermore, just 3% of SCP inquiries that the CAS network handled during that time related to re-determinations and appeals.

However, there are also signs that rural and remote areas face barriers to take-up of SCP. These include the cost and logistics of travel to an advice provider and lower levels of reliable digital connection. Additionally, people living in smaller and more close-knit communities may be more likely to experience stigma for accessing social security. 8% of our SCP clients live in remote areas, and a further 9% live in rural areas. Excepting some island communities for which there is no reliable data, Scottish Government analysis shows take-up is lower in these areas.

We are concerned that delivering mitigation of the two-child limit through a distinct payment could increase the extent of confusion. However, delivering the Two Child Limit Mitigation Payment as an amendment to SCP could potentially have reduced the risk of confusion.

## **7. Do you have any general comments on the draft regulations and their likely impact?**

We welcome the proposed approach and believe that it can swiftly provide essential relief to families. Since child poverty is fundamentally the result of households not having access to enough

money, investing in raising household income is non-negotiable if any meaningful difference made. Analysis by the Child Poverty Action Group (CPAG) estimates that mitigating the two-child limit in Scotland could lift around 15,000 children out of poverty<sup>17</sup>. Analysis by the Institute for Fiscal Studies concluded that removing the two-child limit at the UK level would lift around 540,000 children out of absolute poverty; at a cost of £4,510 per child brought out of poverty. The analysis found this to be the most efficient child poverty reduction policy of those modelled<sup>18</sup>.

However, there is a risk that mitigating for flaws in our safety net will not deliver the change so desperately needed in the absence of fundamental reform.

Both the Two Child Limit Mitigation Payment and the Scottish Child Payment remain only part of the journey towards eradicating child poverty. Accessing these payments could be the “front door” parents can open to access complete early years support for families, built from Social Security Scotland’s Local Area Delivery service. This was the approach taken by the Sure Start programme.

The Institute for Fiscal Studies concluded that the approach taken in this programme reduced the need for support for many children who were initially recorded as having a special need. Additionally, it was found to be particularly effective for children from low-income backgrounds. The programme was managed by a partnership of health, education, social services and the voluntary sector.

The Local Area Delivery service provides an infrastructure that has the potential to reach parents at a key juncture. This can ensure that those who need it can be supported to access a range of services under one roof e.g. through drop in and pop-up services, referral pathways and warm handover arrangements with key partners. This could include linking up to debt advice, childcare providers and health, employability and parenting support. The Local Area Delivery service existing home visit capacity could be developed into a service able to provide outreach provision.

We are optimistic that as evidence emerges of the positive impact of mitigating the two-child limit, the pressure for fundamental reform will increase. We therefore urge the Scottish Government to ensure that robust systems are in place to evidence and report on the impact, supporting work toward eliminating the two-child limit at source.

We would support the use of such evidence as part of a strategic overview of the social security landscape to better integrate and streamline its various components and the agencies responsible for delivering them. Since the challenges associated with delivering the two-child limitation payment are symptomatic of the broader inadequacy of Universal Credit and design flaws pertaining to that payment, we urge the Scottish Government to continue to seek a clear and comprehensive Terms of Reference, remit and reporting timetable in respect of the ongoing Review of Universal Credit. This will ensure that the Review is robust and capable of delivering change.

Going forward, the UK Government should clearly communicate about how the UC review will interact with proposed welfare reforms, including the Timms Review of Personal Independence Payment (PIP).

The CAS network is providing essential support to families to navigate the complex social security system, increasing take up and individual financial gain. This is advice that changes lives. It is imperative that advice services, such as ours, are adequately resourced to promote the efficacy of

social security payments, while reporting on the impact of policies in practice. Long-term and secure funding would provide job security to our advisers, retaining the knowledge and expertise that is trusted in communities across Scotland, enabling more people to access the advice and support that they need.

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*To explore our work developing solutions based on our evidence of the social security system, devolved and reserved, visit our [social security](#) hub.*