

SOCIAL SECURITY COMMITTEE

BENEFIT TAKE-UP

SUBMISSION FROM CITIZENS ADVICE SCOTLAND

Introduction

Citizens Advice Scotland (CAS) welcomes the opportunity to provide evidence to the inquiry. In 2018-19, Scotland's CAB network provided advice on 311,714 issues related to benefits, representing 44% of all advice given in that year. To further inform our submission, CAS surveyed 65 CAB advisers, representing a wide range of geographical areas, to gain their insight into issues surrounding benefit uptake.

1. What do we know about how much is unclaimed and why?

The UK Government produces estimates of levels of take-up and amounts unclaimed for some, though not all, benefits.ⁱ ⁱⁱ CAS records client financial gain across different benefits. This gives an indication of what might go unclaimed, were it not for CAB advice to the clients in question. The circumstance of each case (i.e. whether the client came in looking for support with a specific benefit, or was informed of their eligibility by a CAB adviser as a result of a different enquiry) is unknown.

Overall, CAB in Scotland achieved a client financial gain of over £84 million through benefits payments in 2018-19, of which over £30 million related to Personal Independence Payment (PIP), over £16 million to Disability Living Allowance (DLA), and over £10 million to Universal Credit (UC).

Based on a survey of CAB advisers, the four benefits viewed as most likely to be underclaimed (which all happen to be devolved or due to be devolved) were:

- Personal Independence Payment (68% of respondents)
- Attendance Allowance (63% of respondents)
- Carer's Allowance (42% of respondents)
- Funeral Payments (42% of respondents)

When asked if any particular groups of clients would be less likely to claim their full entitlement, 68% of respondents said older people, with disabled people cited by the next largest proportion of respondents (10% of respondents).

The “why” is more complicated, although there appear to be some commonalities across benefits. Low awareness of benefits themselves, and of eligibility, is commonly reported, as are systemic barriers like the complexity or difficulty of the application and assessment processes.

From the survey of CAB advisers referred to above, the top three barriers to people claiming what they're entitled to were felt to be:

- People don't know they might be entitled (65% chose as one of “top 3”)
- Application or assessment process is too complex (62% chose as one of “top 3”)

- People struggle to make and manage claims online (46% chose as one of “top 3”)

Other common reasons for people not claiming all the benefits they are entitled to include - giving up due to administrative barriers (e.g. delays, long phone calls, lost mail); being put off by a previous bad experience of dealing with the benefits system; feeling afraid of a particular part of the process (e.g. being sanctioned, having to go for a face-to-face assessment); benefits being delivered by different agencies (DWP, HMRC, local authorities, Social Security Scotland); or people feeling shame or stigma in claiming benefits.

CAB cases illustrating some of these issues can be found at Appendix A of this response.

2. What are the gaps in knowledge/research and how can they be improved?

There is a need for good data and research on the levels of take-up for current benefits. Currently, the figures for existing benefits are incomplete, can be out-of-date and may not be the most accurate assessment. For instance, there is currently no official estimate on the level of take-up for Universal Credit, Personal Independence Paymentⁱⁱⁱ or Carer’s Allowance^{iv}. This is vital to better understand gaps and barriers to take-up and as such CAS would recommend the Scottish Government includes commitments to produce take-up estimates in its take-up strategy. This should include estimates for Universal Credit, as it acts as a ‘passport’ to a number of current and future devolved benefits^v.

Additionally, although research has been conducted as to the reasons why people do not take up the benefits they are entitled to – including that which has been submitted to this inquiry – CAS would welcome further research being conducted to inform the design of targeted take-up strategies.

3. How can the administration of benefits be improved to maximise take-up? Specific examples would be welcomed.

As part of our survey of CAB advisers, we asked what options the Scottish Government should prioritise in its benefits take-up strategy. The options supported by most CAB advisers all focused on making it the process of claiming benefits easier:

- Automating elements of the process, where eligibility information is known
- Funding independent advice and advocacy
- Changing application, eligibility and assessment rules
- Giving people the choice of applying for benefits in person, over the phone or online

These are broadly reflective of some key CAS priorities in the design of the Scottish social security system itself. CAS has made a number of specific recommendations for how the process of applying for benefits^{vi}, eligibility criteria^{vii} and assessment processes^{viii} can be improved, which have the potential to increase the take-up of benefits.

Independent advice has a vital role to play in a well-functioning social security system, including support with entitlement, take-up, applications, complaints, appeals, access to information, outreach and continuous improvement.^{ix} As detailed above, Scotland’s CAB network helped clients claim at least £84 million in social security entitlements in 2018-19. This represents a consistent return of £10 of additional money going to Scotland’s citizens

for every £1 of funding, suggesting a strong link between provision of high quality independent advice and increased levels of benefit take-up.

CAS has consistently called for people to be given a choice in how they apply for benefits. This is based on consistent feedback from CAB clients and advisers on their experiences with ‘digital by default’ processes. In particular, this approach to making and managing claims for Universal Credit has been a barrier to a significant minority of people who do not have the internet access or digital skills required.^x

Further detail related to automation can be found in our response to question 4 below.

4. How far is it possible for technology to create a more automated system, that uses information gathered for other reasons to award benefits automatically? What would the advantages/disadvantages be of greater automation?

As outlined above, the most common ‘top priority’ for a benefits take-up strategy in our CAB adviser survey, was to automate elements of the process to make it easier for people to receive the payments they are entitled to. There are a number of ways to do this, all of which CAS would recommend are explored further:

- **Automatically make payments to people who qualify for a benefit by virtue of receiving another.** The process for receiving the Carer’s Allowance Supplement is an excellent example of this. Payment is made to recipients of the Supplement automatically without requiring a separate application by using records for Carer’s Allowance. It would also be possible to apply the same approach to the Scottish Child Payment, and CAS would recommend the Scottish Government give further consideration to doing so to improve take-up.
- **Using existing data to identify people who may be entitled to a benefit, but are not currently receiving it.** This approach has previously been utilised by local authorities to proactively identify people who appear to qualify for low income passported benefits, such as Free School Meals, and encourage them to apply. This approach could be replicated in the Scottish social security system, for instance by contacting people who have received the Best Start Grant Pregnancy and Baby Payment once records indicate their child has reached the age of two, to alert them that they may qualify for an Early Learning Payment.
- **Pre-populating application forms using information already held.** In a number of cases, details about a person and their circumstances will already be held by Social Security Scotland as they have provided them in applying for another benefit. For instance, information provided to support a Best Start Grant application (e.g. names, addresses, dates of birth, details of children) could be used in an application for Scottish Child Payment without a person needing to provide the same information repeatedly. This would have the effect of simplifying the application process, and has the potential to reduce stigma – CAB clients applying for disability benefits have felt upset or embarrassed about having to repeatedly provide details of medical conditions or impairments on numerous occasions to the same agency.

5. What can we learn from previous campaigns to increase take-up? Specific examples of projects or approaches that improved benefit take-up, particularly those that were evaluated, would be welcomed.

Two CAS projects focused on maximising income and increasing benefit take-up have the following strengths in common:

- Meeting people where they are, whether that's at home, in health centres, or in schools.
- Partnership working. Each project makes use of over 500 partnerships to reach people.
- Holistic advice. Both projects can offer a range of advice (and referrals if required), recognising that people's advice needs rarely fit under one neat category.
- Sharing best practice. Both projects make use of regional meetings to share lessons.
- Clear targeting of certain demographics, allowing for focused and effective use of resources.

Money Talk Team (formerly Financial Health Check)

This project is a Scottish Government funded initiative aimed particularly at maximising the income of low income families. The first six months of the project (November 2018 – April 2019) recorded at least an additional 1,332 benefit checks compared to CAB records the previous year when the project was not running, and supported 3,889 clients overall, achieving a client financial gain of just over £2.5 million.

Work is continuing on the 575 local partnerships and a number of national partnerships developed in the project's first six months, ranging from simple referral routes and training opportunities to full co-location. This includes a number of successful local partnerships with schools. Airdrie CAB, for example, has attended parent evenings and offers a weekly surgery at two local secondary schools.

There are also 125 NHS-CAB partnerships, including Citizens Advice and Rights Fife, who have set up a simple referral route with the midwife and health visitor teams. National partnerships with Local Authorities, including registrars, have displayed information and promoted the service in their waiting areas and in new parent information packs.

Welfare Reform Mitigation Project

The Citizens Advice service in Scotland, funded by the Scottish Government, is undertaking a Scotland-wide project to provide a mitigation service to changes in social security. The service aims to maximise income and provide invaluable support to large numbers of people from the more disadvantaged communities of interest, as identified by the Scottish Government.

From April 2018 to March 2019:

- CAB supported over 37,000 clients (one in eight of all CAB clients) successfully reaching typically excluded groups such as people living in SIMD 1 areas (34%), and disabled people (61%)
- Client Financial Gain was recorded as £14.6m (excluding debt remedies), representing value for money with a return of £10 for every £1 of funding

- 33.5% of clients come from the most deprived areas of Scotland, with significant over-representation of clients across a number of potentially disadvantaged groups
- CAB are continuing to strengthen ties across communities, with over 500 partnerships and outreach arrangements reported across the public and non-profit sectors, including GP surgery outreaches and home visits.

6. Are different approaches required for different benefits and different client groups?

Similar principles can apply – for example, simplifying and automating processes where possible – but awareness raising will require different approaches according to the type of benefit and claimant group.

When asked if any particular groups of clients would be less likely to claim their full entitlement, 68% of respondents said older people, with disabled people cited by the next largest proportion of respondents (10% of respondents). This indicates that targeted approaches are likely to be successful in successfully increasing take-up amongst particular groups.

As detailed above, CAB advisers felt that PIP, AA, Carer's Allowance and Funeral Payments were particularly likely to be underclaimed. A summary of advisers' comments on specific take-up barriers for each benefit can be found at Appendix B.

7. What kinds of eligibility criteria ensure better take-up?

In broad terms, if eligibility criteria are straightforward and easy to understand then take-up rates are improved, with people requiring less assistance and advice to help them to navigate the process. It is notable that the benefits felt to be most underclaimed – PIP, AA and Carer's Allowance all have relatively complex eligibility criteria, whilst the benefit with the highest level of take-up according to official figures – Child Benefit – has relatively straightforward eligibility rules.

8. How might the development of Scottish social security impact on take-up of both reserved and devolved benefits?

Citizens Advice Scotland would be hopeful that the development of the Scottish social security system would have a positive impact on the take-up of devolved benefits, with the potential of a consequential increase in the take-up of reserved benefits. CAS has welcomed the principled approach to the development of the new system, including the recognition that social security is an investment in the people of Scotland and a human right, together with proactive campaigns, such as Money Talk Team, and initiatives to promote the take-up of each new payment as they are introduced.

Working together with independent advice services, the introduction of targeted take-up campaigns and support for devolved social security benefits could also lead to increased awareness of eligibility for reserved benefits. For instance, Universal Credit is a qualifying benefit for several devolved social security payments; if there is increased support for people to claim all the devolved benefits they may be entitled to, this could improve awareness and understanding of Universal Credit where it is a qualifying benefit.

Appendix A – CAB cases illustrating barriers to take-up

Agency Practice

An East of Scotland CAB reports of an older client who was told by the local authority to hand in evidence for Housing Benefit and Council Tax Reduction at the library. On arrival, the client was told to call the local authority housing department, who then told him to return to the library. The client is handing in documents in person because they cannot make “head nor tail” of the online form.

An East of Scotland CAB reports of a client who was deterred from claiming ‘new style’ Jobseekers Allowance (JSA) or Universal Credit as the online claiming system was too difficult. When the adviser followed gov.uk instructions to make a telephone claim for JSA on behalf of the client, they were told that there is no alternative to an online claim, despite the client being unable to make the claim online.

Low awareness/knowledge

A North of Scotland CAB reports of a client who cannot work due to a number of health issues and is currently claiming JSA. The Jobcentre had informed the client that the JSA was due to come to an end as he had reached the maximum number of weeks for claiming while ill (12), and the client is likely to be asked to apply for UC. Considering the client’s health conditions (nerve damage, poor eyesight, memory issue, fainting), the adviser suggested that Employment and Support Allowance (ESA) may have been a better fit than JSA. The client did not know about ESA or PIP, and had heard of UC but did not understand it. In addition, if the client does have to claim UC, he will struggle as he does not know how to use a computer or email.

A West of Scotland CAB reports of a client who lost the mobility element in the move from Disability Living Allowance to Personal Independence Payment, but was not aware she could challenge the decision if she wanted to.

Process

An East of Scotland CAB reports of a client who decided against applying for Industrial Injuries Disablement Benefit as their current experience of the application and assessment process for Personal Independence Payment has been so poor. The client finds it difficult to remember and attend all appointments as well as collate required medical information.

A South of Scotland CAB reports of a client with mental health problems who is socially isolated and cannot work. The client is diagnosed with bipolar disorder, suffers from acute anxiety and crippling fatigue, particularly when using medication more frequently, but has been unsuccessful in claiming PIP as he does not readily fit the descriptors.

Poor experience

A West of Scotland CAB reports of a client who withdrew her appeal for PIP before appearing at tribunal as she has been made to feel she is “begging” and does not want to put herself through the trauma of a hearing.

Stigma

A West of Scotland CAB reports of a client and partner, expecting their first child, who are put off applying for Universal Credit even though it means missing out on the Best Start

Pregnancy Grant, because of its reputation and the way they've been treated by Jobcentre staff.

Appendix B – Adviser survey comments on specific benefits

As well as the general “top three” barriers outlined in our responses to questions 1 and 6 above, respondents also had specific comments around barriers to specific benefits. These have been summarised in the table below.

Benefit	Comments on barriers
Attendance allowance	<p>Agency practice: DWP not advising on possible entitlements. The challenge process can feel like a tick box exercise for the deciding agency “sometimes it's as if they keep saying no hoping clients will stop progressing through the challenge process”.</p> <p>Awareness/knowledge: Assumption that it's means-tested. It's a “less high profile” benefit - not much advertising or marketing.</p> <p>Process: The criteria (descriptors) are difficult for clients to interpret, forms can be off-putting, assessment process can be demoralising and helplines hard to get through.</p> <p>Stigma: Potential claimants held back by pride or fear of being perceived as “unable to cope”. Still consider any state support and/or perception of being disabled as negative. Scared of sanctions/overpayments, so would rather not claim at all.</p>
Best Start Grant	<p>Awareness/knowledge: lack of awareness of eligibility and of time limits, not much advertising or easy way to find out info, Stigma: Scared of sanctions/overpayments, so would rather not claim at all.</p>
Carer's Allowance	<p>Agency practice: The challenge process can feel like a tick box exercise for the deciding agency “sometimes it's as if they keep saying no hoping clients will stop progressing through the challenge process”.</p> <p>Awareness/knowledge: people unaware of benefit itself or their eligibility - it's a “less high profile” benefit - not much advertising or marketing</p> <p>Process: The criteria (descriptors) are difficult for clients to interpret, forms can be off-putting, assessment process can be demoralising and helplines hard to get through on. The connection between carers allowance and cared-for person's entitlements can prevent claim.</p>
Council Tax Reduction	<p>Agency practice: work coaches and JCP advisers not checking other entitlement</p> <p>Awareness/knowledge: unaware of entitlement, may assume it is done automatically with UC claim</p> <p>Digital: Online claims are complicated, particularly for those with no digital access or skills</p>
Disability living allowance	<p>Agency Practice: The challenge process can feel like a tick box exercise for the deciding agency. sometimes it's as if they keep saying no hoping clients will stop progressing through the challenge process,</p> <p>Awareness/knowledge: unaware of time limits or eligibility – it's a less “high profile” benefit</p> <p>Process: “Parents are put off making the case” as it is “difficult to obtain” for children due to required proof of disabled child needing more care than non-disabled child of same age. Reluctance to submit to demoralising</p>

	assessment regime. The criteria (descriptors) are difficult for clients to interpret, very off-putting forms and hard to get through on helplines.
Discretionary Housing Payment	Awareness/knowledge: Unaware of entitlement
Employment and Support Allowance	Agency practice: Incorrect DWP advice due to perception of UC “replacing” ESA Awareness/knowledge: lack of understanding of what new-style ESA is, perception that it only caters to those with physical disability so those with mental health issues may not be aware of eligibility Process: put off by the number/bad experience of medical assessments. The lack of data sharing (e.g. results of medical assessments) between departments/agencies means repeated assessments/evidence. Very lengthy, off-putting forms and hard to get through on helplines
Funeral payments,	Agency practice: work coaches and JCP advisers not checking other entitlements Awareness/knowledge: lack of awareness of benefit – seen as “less high profile”. Lack of marketing. Process: overly complicated process Stigma: Media and Westminster narrative of “scroungers”
Housing Benefit	Awareness/knowledge: lack of awareness of entitlement. Councils/Housing Associations could do more to ensure tenants offered DHP when “underoccupying” and receiving Housing Benefit. Stigma: older clients not wanting to be perceived as “burden”, or having to rely on the state, media and Westminster narrative of “scroungers”
Industrial Injuries Benefit Entitlement	Agency practice: DWP not advising on possible entitlements, Awareness/knowledge: lack of awareness, lack of marketing
Jobseekers Allowance	Agency practice: incorrect DWP advice due to perception of UC “replacing” JSA/ESA Awareness/knowledge: lack of awareness, lack of understanding of what new-style JSA is, Stigma: fear of sanctions and having to attend Jobcentres
Pension Credit	Awareness/knowledge: People unaware of benefit
Personal Independence Payment	Awareness/knowledge: people unaware of benefit itself, their eligibility, or of time limits. It's a less “high profile” benefit, with not much advertising. There's a perception that it only caters to those with physical disability so those with mental health issues may not be aware of eligibility, Agency practice: The challenge process can feel like a tick box exercise for the deciding agency. Sometimes it's as if they keep saying no hoping clients will stop progressing through the challenge process., poor decision making. Process: The assessment is too complex, and can be demoralising. The forms are off-putting and it's hard to get through on helplines. Put off by the number/bad experience of medical assessments. The lack of data sharing (e.g. results of medical assessments) between departments/agencies means repeated assessments/evidence. The criteria (descriptors) are difficult for clients to interpret. Stigma: Scared of sanctions/overpayments, so would rather not claim at all.

Tax Credits	Awareness/knowledge: Unaware of availability, it's a less high profile benefit, not much advertising Stigma: Scared of sanctions/overpayments, so would rather not claim at all. Media and Westminster narrative of "scroungers"
Universal credit	Agency practice: DWP not advising on possible entitlements, Awareness/knowledge: low awareness of eligibility Digital: lack of skills and resources to claim online, Process: The system is not set up for vulnerable clients, and overly complicated/bureaucratic for those who would only be claiming short term (between contracts/on zero hours contracts). the criteria (descriptors) are difficult for clients to interpret. the assessment process can be demoralising. the challenge process can feel like a tick box exercise for the deciding agency. sometimes it's as if they keep saying no hoping clients will stop progressing through the challenge process. Stigma: "horror stories" and fear of being left worse off.

ⁱ Income-related benefits: estimates of take-up: financial year 2016 to 2017 – Department for Work and Pensions, November 2018 <https://www.gov.uk/government/statistics/income-related-benefits-estimates-of-take-up-financial-year-2016-to-2017>

ⁱⁱ Child Benefit, Child Tax Credit (CTC) and Working Tax Credit (WTC) take-up rates 2016 to 2017 – HM Revenue and Customs, December 2018 <https://www.gov.uk/government/statistics/child-benefit-child-tax-credit-ctc-and-working-tax-credit-wtc-take-up-rates-2016-to-2017>

ⁱⁱⁱ It is recognised this is difficult to do due to the eligibility criteria depending on a functional assessment.

^{iv} The DWP did commission a feasibility study on the take-up of Carer's Allowance in 2010, but have not published regular official statistics

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/207552/wp_84.pdf

^v Receiving Universal Credit is, or will be, a qualifying criterion for Best Start Grant, Funeral Start Payment, Job Start Payment, Scottish Child Payment and Cold Spell Heating Assistance.

^{vi} Pages 22 - 25, A New Future for Social Security consultation response - Citizens Advice Scotland, October 2016 https://www.cas.org.uk/system/files/publications/social_security_consultation_-_response_from_citizens_advice_scotland.pdf

^{vii} Pages 83 – 87; 123 - 129, Ibid.

^{viii} Pages 75 – 82; 90 - 100, Ibid.

^{ix} Pages 169 – 182, Ibid.

^x Voices from the Frontline: online barriers to maintaining Universal Credit claims – Citizens Advice Scotland, May 2019 <https://www.cas.org.uk/publications/voices-frontline-online-barriers-maintaining-universal-credit-claims>