



Citizens Advice Scotland response Welfare Foods – a consultation on meeting the needs of children and families in Scotland June 2018

Citizens Advice Scotland (CAS), our 60 member Citizen Advice Bureaux (CAB), the Citizen Advice consumer helpline, and the Extra Help Unit, form Scotland's largest independent advice network. Advice provided by our service is free, independent, confidential, impartial and available to everyone. Our self-help website Advice for Scotland provides information on rights and helps people solve their problems.

In 2015/16 the Citizens Advice network in Scotland helped over 310,000 clients in Scotland alone and dealt with over one million advice issues. With support from the network clients had financial gains of over £120 million and our Scottish self-help website Advice for Scotland received over 4 million unique page views.

Introduction and context of response

Citizens Advice Scotland (CAS) welcomes the opportunity to comment on the proposals for Best Start Foods and Vitamins to replace the current Healthy Start system when powers are devolved.

Citizens advice bureaux in Scotland provide advice on eligibility and claiming Healthy Start Vouchers to help clients maximise their income, alongside providing advice on claiming benefits that 'passport' people into eligibility for the vouchers, such as Universal Credit and Income Support.

CAS has previously recommended that Best Start Foods is aligned with the new Best Start Grant. Our specific comments on Best Start Grant can be found in our responses to the consultation on draft regulations¹, and to the 'A New Future for Social Security in Scotland' consultation².

In addition, CAS is supporting bureaux to carry out research on the varying cost of paying for essentials in different areas. This work follows research by Dumfries and Galloway Citizens Advice Service which showed the cost of an average basket of essentials varied from £8.79 to £24.70 across the local authority, and showed evidence of a 'rural premium' as well as a 'poverty premium'.³

¹ Response to consultation on Best Start Grant regulations – Citizens Advice Scotland, June 2018 <https://www.cas.org.uk/publications/cas-response-consultation-best-start-grant-regulations>

² Pages 146 – 152, Response to A New Future for Social Security – Citizens Advice Scotland, October 2016 <https://www.cas.org.uk/publications/designing-social-security-system-scotland-consultation-new-powers>

³ Cost of Living in Dumfries and Galloway – Dumfries and Galloway Citizens Advice Service, October 2017 <https://www.dagcas.org/Handlers/Download.ashx?IDMF=6f2f468c-b0f4-466d-8ddf-f4e1b80c6e47>

Q1. How can we increase the uptake and awareness of the Best Start Grant and Best Start Foods?

Citizens Advice Scotland agrees that combining the application processes for Best Start Grant and Best Start Foods would greatly assist with uptake, by making it easier to apply for. CAS also recommends consideration should also be given to harmonising the eligibility criteria for Best Start Foods and Best Start Grant to make it easier to apply for both.

CAS recommends that awareness of the Best Start Grant and Best Start Foods should be promoted by midwives and health visitors as part of their engagement with young families. Information about it should also be included in the universal Baby Boxes. An advertising or marketing campaign should also be conducted to promote awareness of the Best Start Grant and Best Start Foods.

Investment in income maximisation activity, in line with the requirement in the Social Security (Scotland) Act to promote take-up would also help increase awareness and uptake of Best Start Grant and Best Start Foods. Citizens advice bureaux play a hugely important role in maximising the income of clients, ensuring that they are claiming all the benefits that they are entitled to. In many instances, clients may be seeking advice about another issue (e.g. debt), with the bureaux able to improve their financial circumstances through ensuring that they are claiming the right benefits. In 2016/17, the client financial gain as a direct result of advice on benefits and tax credits was almost £90 million.

As part of CAS consultation with CAB clients and advisers⁴, there was consensus that a range of application methods for the Best Start Grant would be best, including a choice of paper forms, phone, online and face-to-face applications.

The suggestion of combining the process with the application for Healthy Start Vouchers was supported by advisers and clients who took part. One client focus group participant felt it seemed 'daft' that a separate application for both schemes has to be completed, with an adviser commenting that the Best Start Grant application form should be enough 'rather than needing an additional stamp.'

Some CAB advisers who took part in our consultation event and online survey, suggested that the application process could be made automatic, either by connecting it to the Child Benefit system, or as automatic enrolment when a child's birth is registered.

Integrating the Best Start Foods and Best Start Grant applications would be more straightforward if the eligibility criteria for both were harmonised. Whilst the draft regulations for Best Start Grant propose that any award of Universal Credit, any tax credit, and housing benefit are qualifying payments, the proposed eligibility criteria for Best Start Foods are more restrictive. The proposals in the consultation document only includes Universal Credit awards up to an income limit of £610 per

⁴ Pages 146 – 152, Response to A New Future for Social Security – Citizens Advice Scotland, October 2016 <https://www.cas.org.uk/publications/designing-social-security-system-scotland-consultation-new-powers>

month, Child Tax Credit and Housing Benefit up to a maximum income of £16,190 per year, and both maximum Tax Credits with an income under £6,420.

Consideration should be given to adopting the more straightforward Best Start Grant criteria for Best Start Foods, which would simplify the application process by being clearer about who is eligible. This would also have the potential to simplify the administration of the payment by removing the need to check an applicant's income.

Responses from both advisers and clients who took part in CAS consultation events focussed on two areas – information from health professionals and the NHS; and advertising and marketing to promote the Best Start Grant.

Participants felt that awareness of the current Sure Start Maternity Grant was currently low, with only a few of the clients having knowledge of it. Several participants commented that whilst there was information about Child Benefit in the Bounty Pack⁵, there was nothing about the SSMG. Another participant had tried to find out information from Jobcentre Plus, but no information was available there either. There appeared to be very little information available from health professionals.

A number of CAB advisers who took part in our 'Designing a Social Security System for Scotland' online survey emphasised the role of health visitors and midwives in informing new parents of the existence of financial support from the Grant. Other participants in client and adviser consultations felt that an advertising campaign would be helpful, including TV and radio advertising, a social media campaign and leaflets made available. One of the groups also suggested putting information packs into the universal Baby Box to raise awareness of the Best Start Grant.

One current issue with the application process for Healthy Start Vouchers is that Universal Credit does not seem to have been listed as a qualifying benefit until relatively recently, or at least was still absent from forms given out to people who would otherwise qualify.

A North of Scotland CAB reports of a client who is 19 years old and is the lone parent of two young children. She sought advice because her Universal Credit payment had not included the child element due to an administrative error. Also her Healthy Start application had been rejected three times. Despite being signed off and submitted by the local health visitor, the problem appeared to stem from the fact that Universal Credit was not listed as an option on the form, and the client was obliged to note that 'none of the above apply'.

⁵ Bounty packs <http://www.bounty.com/about-bounty/bounty-packs>

In addition, CAB research has revealed considerable differences between the costs of food in different areas within a local authority,⁶ meaning that a Best Start Foods payment is likely to buy a different amount of food in different areas, particularly in more rural locations. This may be a factor that the Scottish Government wants to consider in the wider design and delivery of the payment.

Q2. What can we do to make the smartcard system as easy to use as possible?

There are a number of potential advantages to introducing a smartcard system to replace the current paper-based vouchers as outlined in the consultation document. In particular, the consideration given to reducing stigma associated with paying with vouchers is particularly important to maximise take-up.

Whilst a smartcard system has the potential to reduce some of the stigma associated with being openly identified as being in poverty, a separate smartcard will still carry some of these connotations. In line with the approach taken to other payments within the Social Security (Scotland) Act, CAS would recommend people are given a choice of cash Best Start Foods payments, as well as the smartcard option. In addition to further reducing stigma and maximising choice, this option would also help reach people who live in an area where their local shop does not accept payment by card.

CAS would also recommend that the introduction of a smartcard is accompanied by awareness-raising activity with retailers, to avoid embarrassment being caused to individuals if a retailer does not recognise the card, an issue that presented with vouchers in the early days of the Scottish Welfare Fund.⁷

Q3. How do we gather feedback to make improvements as the system develops?

In addition to collecting feedback from users, whether through the Social Security Experience Panels or another route, Citizens Advice Scotland routinely gathers quantitative and qualitative feedback from CAB clients and advisers through our 'Citizens Alerts' system which could be used to highlight any emerging issues with Best Start Foods once the system is launched.

Q7. Should the provision of children's vitamins be linked to eligibility for the new Best Start Foods (i.e. up to the age of three)?

Yes, providing vitamins for children as part of Best Start Foods has the potential to improve take-up, in addition to providing vitamins for all pregnant women under the age of 18.

⁶ Cost of Living in Dumfries and Galloway – Dumfries and Galloway Citizens Advice Service, October 2017 <https://www.dagcas.org/Handlers/Download.ashx?IDMF=6f2f468c-b0f4-466d-8ddf-f4e1b80c6e47>

⁷ Col. 34-37, Official Report - Scottish Parliament Welfare Reform Committee, 7 October 2014 http://www.welfarereformscotland.co.uk/downloads/The_Scottish_Parliament-W_R_Committee_Report_7_Oct_2014.pdf