

Consultation response to the Department for Work and Pensions document:

No one written off: reforming welfare to reward responsibility

- 1.1 Children in Scotland welcomes the opportunity to respond to this consultation on welfare reform, which will have a significant impact on the lives of children and young people in poverty throughout our nation.
- 1.2 We welcome the emphasis in *No one written off* on the goal of eradicating child poverty in the UK by 2020. We think that the funds required to meet this commitment represent an investment as critical to the future of the UK as the current, far more costly, bailout of the financial sector. Thus, we believe that the UK Government's underwriting of the banking system (that has occurred since this DWP document was published) should not be used as an excuse to delay or back away from the promise to end child poverty throughout the UK by 2020. **Indeed, in the context of the anticipated economic downturn, we would particularly draw attention to the contribution that might be made to diminishing child poverty and "investing in productivity" through funding to devolved governments throughout the UK for further development of high quality integrated services for young children.** We believe – as described later – that this would offer real "investment for productivity" through not only creating jobs and facilitating access to employment but also in contributing to the improved wellbeing of all families. The evidence suggests this could make a substantial contribution to reducing child poverty on a basis which meets the needs of young children together with their

- parents.
- 1.3 While poverty can be a difficult (and often miserable) experience for all age groups, it can be particularly damaging to children and young people. In addition to material restrictions, poverty has social, emotional and health repercussions that act as (and create) barriers to life-long opportunity and self-improvement.
 - 1.4 Welfare reform is one of the UK government's key policies for ending child poverty. The nature and quality of welfare reform inevitably will have significant consequences for the lives 'here and now' of children and young people in poverty – as well as and for the success of their eventual transitions into adulthood.
 - 1.5 Therefore, it is crucial that welfare reform gives the same priority to actively promoting the well-being and life chances of children and young people in poverty as it does to actively promoting employment for their parents. It is not the case that parental employment alone will - inherently and automatically - improve the current and future well-being of the children and young people affected. It is essential that parents have access to services which meet their needs together with those of their children.
 - 1.6 The need is for a welfare reform package clever and sensitive enough to distinguish between the likely winners (for whom it should be delivered robustly) and the likely losers (for whom other alternative measures should be created and delivered). In welfare reform, as in so many other areas of life, one size simply does not fit all.
 - 1.7 There is much in these proposals that Children in Scotland supports. We commend the general direction of travel towards enhanced support for parents in finding, retaining and progressing in employment, particularly the additional advice and payments to newly in-work lone parents.
 - 1.8 This recognises the social, emotional and financial obstacles – often heightened by caring responsibilities – that can discourage and hamper efforts towards employment. Parental employment is far from a panacea to the problems facing children, but for many families it has the potential to be an important step in the right direction. However **services need to be provided on a basis which offers the best experience for children as well as care for**

their parents and this requires – as recognized in the OECD Starting Strong¹¹ report - overcoming the ingrained split between ‘childcare’ regarded as a private commodity to be sold to parents and education as a universal entitlement.

- 1.9 Against this background, we do have serious concerns about the negative impacts that the more punitive elements of this welfare reform package will have on the children of welfare claimants – children and young people who are already among the most vulnerable in our society. The Government’s laudable targets for eradicating child poverty should not become an economic finishing line over which families are dragged via punitive welfare policies. **No primary carers should be forced into employment when there are serious negative consequences of their employment for their children.**

Specifically, Children in Scotland encourages the UK Government to revise its current welfare reform proposal in the following ways:

- ❖ *Ensure that childcare responsibilities, concerns and costs are taken fully into account for all mothers/fathers/kinship carers who are benefit claimants, not just for lone parents.*
- ❖ *Take a personalised, case-by-case approach to the employment of lone parents, rather than setting requirements on the basis of the age of the youngest child.*
- ❖ *Include a commitment that lone parents will not be moved onto Job Seeker’s Allowance until genuinely affordable, accessible and high quality childcare for their children is in place.*
- ❖ *Reconsider financial sanctions for welfare claimants with dependent children, on the basis that further financial insecurity may irreparably damage the current well-being and future life chances of these children.*

- ❖ *Begin working with the Scottish Government to determine how all areas of policy impacted by these proposed welfare reforms will be planned, implemented and assessed properly in the context of a devolved national government and the reality that welfare reform involves an intertwining of reserved and devolved matters.*
- ❖ *Develop a programme for enabling devolved administrations across the UK to implement early years strategies which offer full time affordable integrated services for all young children irrespective of employment status.*

2. Support and requirements for parents

- 2.1 Children in Scotland welcomes the emphasis within *No one written off* on strengthening parents' shared responsibilities to contribute financially and emotionally to their children's upbringing.
- 2.2 We currently run a project on the Gender Equality Duty/Fathers in Scotland, with funding from the Scottish Government's Equality Unit. We advocate promoting and supporting opportunities for the equal and positive involvement of both mothers and fathers in children's lives from the outset. The proposed full child maintenance disregard in assessing means-tested benefits is a positive move. And, we look forward to the successful establishment of the Child Maintenance and Enforcement Commission as a body explicitly concerned with the best financial interests of children.
- 2.3 It is well acknowledged that lone parents (approximately 90% of whom are women) face particular obstacles in finding and retaining work,¹ and this correlates with an increased risk of poverty for children in these households.² The UK Government has already made good progress in increasing the proportion of lone parents in employment

¹ Evans, M., S. Harkness and R. A. Ortiz (2004) *Lone parents cycling between work and benefits* DWP Research Report No 217

² Department for Work and Pensions (2007) *Households Below Average Income 1994/5-2004/05* Corporate Document Services

over the last decade, and this has made a significant contribution to reductions in the number of children living in poverty. *No one written off* aims to continue this progress, and proposes a number of reforms to benefits and support for lone parents.

- 2.4 While recognising the importance of this additional support, Children in Scotland would make two points about these policies from the perspective of a focus on child well-being. First, we recommend that the Government follow the suggestion of the Harker report,³ ensuring that family responsibilities are taken into account in *any* parent's interactions with Jobcentre Plus, whether they are parenting alone or as part of a couple. This includes, but is not limited to, childcare responsibilities.
- 2.5 Second, we encourage support for welfare claimants who are the primary carers of dependent children to be given meaningful training and support in their **parenting** roles. Welfare reform explicitly should be designed and implemented to result in better parents, as well as employed parents.
- 2.6 The calculation of whether employment is the best option for an individual with responsibility for children goes beyond a straightforward comparison of income from employment versus benefits. Children in Scotland would like to see a genuine calculation of all the *costs of employment* for mothers/fathers/carers (including actual childcare costs, transport, loss of free school meals, etc.).
- 2.7 In particular, the continued inadequacy (both in terms of availability and quality) of affordable services for young children in the UK undermines the Government's stated commitment to child well-being. While this is partly a devolved responsibility, there is a dearth of first-rate early years provision across the UK – particularly, but not exclusively, in the 'gap years' between the end of statutory maternity leave and the start of publicly-subsidised places in services which meet the needs of children and parents.

³ Harker, L. (2006) *Delivering on child poverty: what would it take? A report for the Department for Work and Pensions*

What is a lone parent with an 18-month old child - but without effective access to affordable, high quality services - supposed to do with that child while in education or at work? Until there is an adequate answer to that simple question, it is not good policy or practice to force that parent to leave the child behind in potentially unsafe or inadequate circumstances in order to comply with 'get tough' welfare reform requirements. **The long-term aspiration of these reforms to move all lone parents onto Job Seekers' Allowance should not progress until the availability, affordability and quality of early years provision have been addressed.**

- 2.8 We, therefore, advocate a more flexible and personalised approach to the employment-seeking conditions of benefits for mothers/fathers/carers. The proposal to move lone parents onto Job Seeker's Allowance as their youngest child turns seven – irrespective of what is true about that child's needs and circumstances - illustrates the mechanistic and asocial understanding of parenthood dominant in these proposals. The responsibilities associated with caring for children do not neatly diminish as they become older.
- 2.9 Children's needs, and the concomitant demands on their parents' time, fluctuate and vary from child to child. Families with several children are likely to experience more stresses and unpredictable events than families with one child. Families with children having certain disabilities or major additional support needs should have those realities taken fully into account. This should not equate to a 'points-based system', where different children are calculated to excuse parents from different levels of conditionality. **Holistic, case-by-case decision-making with the best interests of children being accorded the same priority as parental employment is the only sensible way forward.**

3. Financial sanctions

- 3.1 A key element within *No one written off* is reliance upon increasingly severe sanctions for claimants who fail to comply with the requirements of the different benefits regimes. While the general requirement to look for, and be

available for, work seems reasonable, we are concerned on several counts about the proposed withdrawal of one or two weeks' benefit for people caring for children.

- 3.2 First, the additional pressures parents and other primary carers face in complying with the increased requirements should be recognised and reflected in policy and practice. A study of lone parents and benefit sanctions has shown that claimants rarely make an active choice to miss Work-Focused Interviews, and that caring responsibilities are a key factor in failure to attend.⁴ It is both unreasonable and dangerous to force parents to choose between looking after their children in a period of ill-health or a crisis, and receiving the following weeks' benefit. Additional stress in such situations will adversely impact upon children.
- 3.3 Second, and crucially, where a sanction is applied it will contribute to financial insecurity and hardship for claimants' children. The same research study found that few lone parents knew in advance or understood why their weekly income had been cut. In such cases, children suffer financially without the desired 'lesson' being learnt by their parents.⁵ Improved communication between Jobcentre Plus and claimants, while necessary, will only modify - not remove - the negative consequences for children.
- 3.4 Accordingly, **we oppose the use of financial sanctions for non-compliance with the benefits regime, on the basis that it threatens the already fragile and inadequate financial security for the children of welfare benefit claimants.**

4. Implementation in Scotland

- 4.1 *No one written off* includes a commitment to 'exploring' how measures relating to devolved matters can be applied to Scotland. This strikes us as being an example of "too little too late". It would have made far more sense for the UK Government to have completed this exploration with the

⁴ Goodwin, V. (2008) *The effects of benefit sanctions on lone parents' employment decisions and moves into employment*. DWP Research Report No 511

⁵ Goodwin, V. (2008) *The effects of benefit sanctions on lone parents' employment decisions and moves into employment*. DWP Research Report No 511

Scottish Government and the other devolved administrations in advance of proposing this welfare reform package.

- 4.2 There are numerous areas where the proposed welfare reforms overlap with devolved matters (including registration of births, skills development, criminal justice and education). Indeed, successful welfare reform requires an acknowledgement of the intricate intertwining of reserved and devolved matters, as well as genuinely joined-up thinking, planning and implementation. The apparent absence of the Scottish perspective and Scottish realities from *No one written off* is an obstacle to effective policy and practice.
- 4.3 As an example, we draw particular attention to gaps in early years provision in Scotland. The legal entitlement to 'childcare' while in employment, education or training that is enjoyed by parents in England and Wales does not apply in Scotland – a fact with obvious consequences for welfare reform. Similarly, the recent UK Government announcement about extending government-subsidised childcare places to two-year-olds was not intended to cover Scotland, too.
- 4.4 As noted in our introduction, **the current focus on 'investment in productivity' could usefully take the form of major funding for integrated early years services for children – including school age services. Funding could be made available to devolved administrations and government throughout the UK to support the implementation of their varying early years strategies – and to complement the current welfare package.**
- 4.5 Ideally, Scottish policies and practices would have been better represented in the development of any UK-wide welfare reform package. Given the complicated interplay of devolved and reserved matters in these proposals, it is absolutely crucial that the UK and Scottish Governments engage in some partnership working in the very near future, to establish the best way forward. This also will help reassure both the public and the organisations that will be required to implement these changes that Scotland and its children will not be forgotten as these reforms move to implementation. The priority must be to ensure that vulnerable groups - such as young care leavers, whose new

responsibilities are matched by new support such as 'second-chance learning' in England - do not find themselves subject to the 'stick' without the benefit of the 'carrot' in the Scottish context.

4.6 Therefore, Children in Scotland urges the UK Government to begin working with the Scottish Government to determine how best all areas of policy and practice impacted by these proposed welfare reforms will be planned, implemented and assessed properly in the Scottish context.

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Children in Scotland is Scotland's national agency for organisations and professionals working with and for children, young people and their families. It exists to identify and promote the interests of children and their families and to ensure that policies and services and other provisions are of the highest possible quality and are able to meet the needs of a diverse society. Children in Scotland represents over 470 members, including 90% of Scottish Local Authorities, all major voluntary, statutory and private children's agencies, professional organisations, as well as many other smaller community groups and children's services. It is linked with similar agencies in other parts of the UK and the European Union.

The work of Children in Scotland encompasses extensive information, policy, research and practice development programmes. The agency works closely with MSPs, the Scottish Government, local authorities and practitioners. It services a number of groups such as: the Cross Party Parliamentary Group on Children and Young People (with YouthLink Scotland) and the National Voluntary Children's Forum. Children in Scotland also hosts Enquire - the national advice service for additional support for learning, and Resolve:ASL, Scotland's largest independent education mediation service.