

## WELFARE REFORM COMMITTEE

### THE FUTURE DELIVERY OF SOCIAL SECURITY IN SCOTLAND

#### WRITTEN SUBMISSION FROM ABERDEEN CITY COUNCIL

The Inquiry is looking for views on how the proposed devolved powers might be used to better deliver benefits in Scotland. Under the four workstreams below, the Committee would particularly welcome:

- Practical suggestions to ensure that the principles of dignity, respect, support, equality and common sense are embedded in the new system.
- Views on the integration of Scottish devolved benefits with existing devolved powers and any unintended consequences of changes.
- Systems of intergovernmental working in relation to benefit delivery

#### Workstreams

##### **A) How should the new welfare powers proposed by the Smith Agreement be used to improve or change Personal Independence Payments, Disability Living Allowance Attendance Allowance and Carer's Allowance**

There is an opportunity to design a new working age disability benefit which would embrace the principles of fairness and reverse some of the more challenging welfare reforms that have been implemented for vulnerable people. A key aspect would be reversing the 20m mobility rule to the more widely acceptable 50m; the requirement that everyone needs an assessment – the assessment process, however well designed, causes undue stress and anxiety for many people, especially those with conditions which will clearly entitle them to receipt of benefits. To support this, assessments should take place in healthcare settings which are a familiar environment for this client group and would remove the stress and anxiety associated with attendance at unfamiliar, often more business like premises. Consideration should be given to default assessments being carried out by healthcare professionals within the NHS – this would overcome the doubts about knowledge and experience within private companies and acknowledge the expertise and patient knowledge built up by GPs and other health professionals, helping reinforce confidence in a system delivered with dignity.

The levels of carers allowance should be reviewed to better reflect the level of preventative support delivered by carers and the ultimate savings on public spend.

##### **B) How should the new welfare powers proposed by the Smith Agreement be used to improve or change Universal Credit (housing element and administrative arrangements arrangements) and Discretionary Housing Payments**

The administrative flexibilities are well documented – the default position should be that housing costs continue to be paid to landlords (as is the case in housing benefit) with an opt out for people who want to manage that element directly. Similarly, the default position

should be that payments are made fortnightly, with options for people to opt-out where they wish to manage monthly payments (linked to receipt of housing costs). The administration of benefits should have a more local link than currently provided through the UC service centre model – this makes it difficult for local JCP staff, local authority and other advisers to help resolve issues quickly for clients, who often experience a degree of need and urgency beyond DWP timescales for escalating issues.

The Committee should consider that arrangements for managing the administration of benefits is delivered more closely in line local authority and community planning structures, to ensure effective local delivery of national provision (while upholding national rules around entitlement etc). This would ensure a better connection between the needs of people locally with access to the effective support, information and advice people need in accessing benefits, managing changes of circumstances and ensuring successful navigation of the system.

### **C) How should the new welfare powers proposed by the Smith Agreement be used to improve or change the Work Programme and Work Choice**

The Committee should consider the further devolution of the management and delivery of an integrated employability approach to local authority and community planning frameworks. This will ensure local specialist and niche provision can meet the needs of local people. The development of such local supply chains has not been well developed through current national contracting frameworks – local authorities have well established networks of employability and support providers and would be well placed to manage the local delivery of a Scottish Programme.

There is a clear opportunity for more effective engagement with the third sector and social enterprises – contracted providers frequently rely on these organisations to provide the final step in work experience and placements for people returning to work. This key step in a client's employability journey is not cost-free in the same way that hosting volunteers is not, so consideration should be given to supporting the cost of provision of such placements as the final key step in returning to employment.

It is understood that DWP will retain the right to mandate people to Scottish provision and implement sanctions where this may not be maintained – in order to try and mitigate the risks of sanctions for people, there should be a clear role for third sector and local authority support for clients in agreeing their claimant commitments. Issues arise for claimants through a lack of confidence in working with their advisers and the risk of a tendency to agree to whatever is proposed – some form of second opinion sense-check, even for vulnerable people, would contribute to a reduction in sanctions (a similar approach could be adopted more generally for claimants out with the employability programmes).

Specialist provision for people with disabilities and long term health conditions should be retained and enhanced, coupled with support for the development of provision through social enterprises; this needs to link more closely with emerging health and social care integration priorities, where there is a clear impact on national indicators around well-being. Clarifying referral routes for people with disabilities and health conditions to ensure people were referred to the specialist provision rather than mainstream long term unemployment provision would ensure a more dignified approach for people, which could integrate more

closely with a more effective approach for claimant commitments as described above. This would help avoid the situation where people who have languished on Incapacity benefit for many years, have no meaningful experience for a CV, and yet find themselves found fit for work and with a 35 hour per week claimant commitment.

In addition, clients in the ESA work related activity group should receive additional help beyond that of the work coaches, which would better take account of the health and disabilities around the award of ESA, so that the work related activity agreed can be more meaningful and suitable for claimants.

Public sector employers should be obliged to open up and develop further the range of placements, work experience and related opportunities that they can provide and ensure recruitment practices take account of people who may not be in a position to complete conventional CV and applications. This work would link with and build upon the local delivery of programmes described above.

#### **D) How should the new welfare powers proposed by the Smith Agreement be used to improve or change the Regulated Social Fund, new benefits, top-ups and delivery of benefits overall**

Generally the Regulated Social Fund benefits are felt to work well, largely due to very clear entitlements.

In terms of delivery of benefits overall, there is scope to better align those passported benefits to help ensure both uptake and links with income maximisation and advice services, but also to avoid any risks associated with the roll out of Universal Credit.

The main concern about the delivery of benefits overall remains the conditionality and sanctions regime and how it is applied. It is recognised that there should be a requirement that people participate in appropriate support programmes, and that a level of sanction be applied where people refuse. It seems however that the current administration of these arrangements is largely inappropriate, inconsistent and unfairly applied, frequently as a result of people not understanding the requirements and arrangements they have agreed.