Social Security Committee

Benefit Take-up: Summary of Submissions

Introduction

This paper summarises the main themes in the 55 submissions received as part of the Committee's inquiry into benefit take-up. It is organised around the nine questions asked in the call for views. Annex 1 lists examples of projects and successful take-up initiatives referred to in submissions. Annex 2 lists the additional questions suggested for Committee consideration in answer to question nine.

With the exception of two submissions from individuals, all were in favour of promoting benefit take-up.

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

Many submissions refer to the DWP and HMRC estimates of take-up – with a particular focus on low take up of pension credit and working tax credit. A summary of these estimates was provided in the SPICe paper for the meeting on 5 September.

Disability benefits and, as yet, universal credit, are not covered in the official estimates. Estimates that do exist are at a GB level, and as JRF[1] notes, evidence of take-up at a Scottish level is scarce.

It is difficult to get accurate figures particularly for benefits with complex assessment criteria such as disability benefits. Generally estimates rely on surveys where questions do not match the eligibility criteria of the benefits.

One indication of underclaiming is the amount realised through welfare rights advice and income maximisation projects.

Citizen's Advice Scotland (CAS) state that CAB in Scotland achieved a client financial gain of over £84m through benefit payments in 2018-19, of which over £30m related to PIP, over £16m to DLA and over £10m to universal credit. (Examples of other income maximisation projects are provided in annex 1). Their survey of 65 CAB advisers found that the four benefits most likely to be underclaimed were all devolved (PIP, attendance allowance, carer's allowance and funeral payments).

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[1] Joseph Rowntree Foundation

David Bell and Elaine Douglas[2] discuss how to estimate take-up of disability benefits and point to the example of free personal care - where estimates of likely cost have been far exceeded - to illustrate the importance of accurate forecasting. They discuss the limitations in using survey data such as the family resources survey which is not specifically designed for estimating take-up. Using their survey: 'Healthy ageing in Scotland', they compare people's responses about their ability to do various daily tasks with whether they are claiming attendance allowance and conclude that: "disability only explains some of the variation in take-up." They suggest that: "there is an urgent need to ensure that the key factors which drive take-up should be better understood."

Submissions refer to low take-up amongst: young people (JRF, CEMVO[3]), older people (CAS, Independent Age), people in rural areas (Shucksmith), people from ethnic minorities (CRER[4], CEMVO, disabled people (CAS) and those towards the 'upper end' of entitlement (CIH[5]).

In contrast the high take-up rates for child benefit and child tax credit are often referred to.

The reasons given for underclaiming were fairly consistent – and noted by CPAG as being relatively well researched. The most common reasons mentioned were complexity and lack of knowledge, followed by administrative barriers, lack of accessible information, previous bad experience and stigma.

Difficulties are increased where well-being, health issues or complex lives reduce people's energy to engage with a complex system (MS Society, MND Scotland, the Action Group[6], Inclusion Scotland). This is particularly the case for disability benefits which are complex and stressful to apply for.

CAS provided case examples of barriers to take up in the appendix to their submission.

People's view of themselves also prevent them claiming – carers may not consider themselves as carers (National Carers[7]), moderate earners may not consider themselves eligible for in-work benefits (SCoRSS[8]), people with mental health issues may not consider themselves disabled (SAMH).

The often complex way in which benefits can interact with each other can make people concerned about claiming or unaware of additional entitlements. For example, carers may worry that by claiming carer's allowance the person they care for will lose their severe disability premium (National Carers). The severe disability premium was also given as an example of a little known entitlement by

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[2] Healthy Ageing in Scotland, (HAGIS) Stirling Management School, University of Stirling

[4] Coalition for Racial Equality and Rights
[5] Chartered Institute of Housing
[6] Action Group and Lothian Centre for Inclusive Living
[7] Joint submission from Carers Scotland, Carers Trust Scotland, Coalition of Carers in Scotland and Shared Care Scotland
[8] Scottish Campaign on the Right to Social Security

Policy in Practice who found 16,408 households in Wales who were eligible for but not receiving this premium.

Possible reasons for lower pension credit take-up in rural areas are discussed by Shucksmith et al. These include: lack of informal sources of information, fewer social landlords, stronger social stigma, less anonymity, greater distances to travel for advice, less likely to regard themselves as poor, seasonal workers may only be eligible for short periods and so not consider it worth claiming. Others mentioned poor internet connections and phone signals and expensive public transport as barriers to claiming that particularly affect rural areas. (eg Argyll Community Housing Association)

It was also suggested that where the amount to be gained is relatively small, but the effort of claiming or cost of processing is large, people may decide not to claim (Spicker) or agencies may be reluctant to promote availability (Advice Shop)

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

Equalities data.
The lack of equalities data being collected is raised by Engender, CEMVO, CRER and JRF as something that makes it difficult to target efforts to improve take-up

Engender, CRER and Scottish Women's aid have been in discussions about this in relation to the best start grant application form. Engender say they have been told that their concerns are being addressed as a matter of urgency and are due to meet the Cabinet Secretary.

CRER note that the Scottish Government's Race Equality Framework for Scotland 2016-30 includes a commitment to 'work to fill the gaps in current knowledge on how and to what extent minority ethnic people are accessing the benefits they are entitled to' and therefore believes that "the Social Security Committee must ensure that policies are being put into place to enable accurate monitoring of take-up."

Estimating take-up and reasons for under-claiming
As discussed above, take-up of disability benefits is difficult to estimate, but CPAG would "urge that methods are found that will allow the success of the take-up strategy to be measured and take-up activity to be informed by data." They consider that the 2021 census could be a useful source of data if it has the right questions in it. "it is not clear whether the new data need for monitoring disability assistance has […] informed census questions on long term health conditions and disability." Inclusion Scotland suggest further boosting to the Scottish sample of the family resources survey.

Other benefits referred to as requiring further research included: council tax reduction (CPAG), attendance allowance (Age Scotland) and income based JSA (Inclusion Scotland). Discussing the new proposed rules for terminal illness,

Marie Curie suggest there needs to be research into how many people this might affect.

Research with people who do not claim benefits is suggested, including those in rural areas (Shucksmith), older people (Bell and Douglas, Independent Age), people in work and disabled people (Action Group).

Using management information
The Poverty Alliance notes that Social Security Scotland: "provides an excellent opportunity to improve evidence around levels of take-up, and efforts must be focused on building the evidence base." CPAG suggest that information should be collected on factors such as why claims are refused and why appeals lapse.

3. How can administration of benefits be improved to improve take-up?
Unsurprisingly, many submissions suggested improvements which were the opposite of what they had suggested as reasons why benefits are not claimed.

Multiple application channels
Most submissions referred to the need for multiple application channels, citing difficulties with IT access as a barrier to claiming. While difficulties of the universal credit 'digital by default' approach were mentioned frequently, it was also noted that local authorities also often only provide information online (Policy in Practice) and the emphasis on online applications for Scottish social security (See Me). Edinburgh Council referred to their online applications for HB and CTR as a positive step, in that it reduced processing times, although only allowing these to be claimed online was cited as a barrier by the Advice Shop.

Clear, accessible communications
Straightforward language and accessible communications are important (LITRG[9], Action Group, MND, MS Society, NASS[10]). One way to achieve this is to design forms and systems in partnership with those using the system (eg Poverty Alliance). Social Security Scotland should therefore have a continuous focus on improving form design and application processes (CPAG).

More generally, West Lothian council suggested quicker processing and shorter forms.

Accurate information and decisions
CPAG refers to high levels of error in benefit administration, (such as telling people to claim the wrong benefit, underpaying and overpaying) and suggests that staff training would help. SAMH refers to disability assessments which are "too often inaccurate and stigmatising."

Enable refer to the need to challenge poor decision making and CPAG to ensuring people are always able to appeal a disability assistance decision.

Workforce

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[9] Low income tax reform group
[10] National Autistic Society Scotland

The crucial role of the staff administering benefits and undertaking assessments was raised in many submissions. Staff need to know the benefit they are administering, they need to know the range of other possible entitlements and they need to understand the challenges faced by the applicant – whether due to disability, ill-health, equalities or other issues. They need to have a 'person centred', 'holistic' and 'compassionate' approach.

There was a common theme of the need for staff training about the various conditions and challenges faced by claimants. (NASS, CEMVO, MND). For example MND referred to the need for a "compassionate system with compassionate and well-trained staff who understand the challenges faced by someone with MND."

Much of this, together with calls for 'quicker decisions', imply greater resources, although generally resources were only specifically mentioned in relation to funding advice services.

Advice
The importance of advice was a common theme in submissions. (For example age Scotland, Marc Allison, CEMVO,CPAG, CAS, FAIR, SAMH, SCoRSS,) Some distinguished between advice and information, saying that advice and 'personal', 'holistic' and pro-active approaches were needed (eg Action Group, National Carer orgs, Argyll Community Housing Assoc). For example West Lothian Council said there needed to be more emphasis on active referrals rather than just signposting and the Action Group said it is often important to provide ongoing support and advice- to help someone maintain a claim – not just make it.

Staff in other services
It was noted that many health, education and social care staff lack knowledge to advise people on benefits (eg. FAIR). National Carer Organisations point out that is NHS and local authority staff that carer's often first (and most frequently) come into contact with and so are crucial in ensuring people are aware of their entitlements. It is important to provide advice in hospitals, and 'trusted settings' such as GP surgeries and schools (eg Poverty and Inequality Commission).

Specific barriers
Two specific administrative barriers mentioned were the requirement to have mandatory reconsideration (in the reserved system) and redetermination (in the devolved system) before someone can appeal (Rights Advice, Glasgow Council) and the need to phone for a PIP claim pack (Rights Advice).

OPFS note that: "Benefits that require people to continuously report on their circumstances and behaviour may create more stigma than those that only require a one-off application."

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 be the advantages/disadvantages of greater automation?

Many submissions spoke positively of the potential for automation. For example CAS said the most common 'top priority' amongst their advisers was for elements of the system to be automated. Several submissions wanted one claim that would automatically trigger entitlements to a range of benefits and support (eg SCoRSS, Highland, Glasgow Council, Edinburgh Council). However, there were many who, although welcoming the potential of greater automation, expressed concerns about possible negative impacts and concerns about data protection requirements.

Automation was discussed in terms of:
- Making applications and managing claims online
- Automatic entitlement to certain benefits in some circumstances (such as terminal illness)
- Automatic transfer from old to new benefits when benefits are replaced (moving from legacy benefits to UC, and moving from reserved to devolved benefits)
- Data matching or more sophisticated analytics to target potential applicants for different benefits
- Data sharing to:
    - automatically award passported benefits if a qualifying benefit is awarded
    - use information about one benefit to award other benefits with similar eligibility criteria
    - use one 'financial circumstances' form to award all relevant benefits
    - only require someone to supply information once ie an extension of the 'tell us once' idea
    - identify where the award of one benefit or other changes in circumstances require a change to another benefit

There was a general view that better use could be made of the information already in the system – (Rights Advice Scotland, Action Group, CAS, Edinburgh Council, Independent Age, Glasgow Council) with a view to either using information collected for one purpose (such as CTR) for another (such as school clothing grants or education maintenance allowance), or avoiding having to repeat the same information to the same agency for the same benefit (CAS).

On the other hand, many submissions opposed 'digital by default' approaches, and one of the most common comments under administration of benefits was the need for multiple application channels. Another common comment was the need for staff to understand the particular challenges faced by claimants (whether due to the impact of their disability or illness, or equalities considerations) which suggests that an automated system would not be appropriate. Inclusion Scotland state that "it should be internal systems that are automated whilst several routes to claiming are available to users."

Glasgow Council, whose school clothing grant process is referenced in many submissions as a successful example of automation, stress the need to have the legal framework in place before information gathered for one purpose can be used to award benefits automatically. It must be made clear how data will be used and applicants must be given the choice of whether their data is used for other specific purposes.

Examples of automation
- Edinburgh Council have a 'digital only application process' for housing benefit and council tax reduction which has reduced processing times from 33 days to 17 days. (Although the Advice Shop criticise this online only approach).
- Highland Council 'apply once' is an online single application form for 11 council administered entitlements. They would encourage something similar at national level saying: "relying on a system that requires new applications acts as a barrier"
- Child benefit information is shared with DWP for UC purposes (Policy in Practice)
- HMRC are notified when a disability benefit is awarded or stopped in order that the correct premiums can be applied to a tax credit award (LITRG)
- Glasgow Council use CTR and HB information to automatically award the school clothing grant
- Carer's allowance supplement is a fully automated, passported benefit (CAS, CPAG)
- The baby box information is used to trigger payment of the best start grant (Perth and Kinross Council)
- Real time information (RTI) on earnings is used for UC and tax credits although this has caused problems (discussed below) (LITRG)

Potential uses of automation
There were a number of suggestions for further use of automation – generally focused on using data collected for one purpose for another purpose. (However, this would require consideration of data protection principles and privacy rights).

- Data matching was suggested as a way to target people potentially eligible for benefits (CPAG, CAS).
- DWP allows local authorities access to 'searchlight' (customer information system) to verify income, the data "could be used for a multitude of other awards such as school clothing grants, meals etc" (West Lothian Council)
- West Lothian and Glasgow councils suggest that it should be possible to use income information provided in a council tax reduction application to award education maintenance allowance, free school meals and clothing grants.
- West Lothian Council suggest that DWP information should be available to allow automatic award of a 'blue badge' where relevant.

- Both the Poverty and Inequality Commission and the Poverty Alliance suggested that the new child payment should be awarded automatically to those in receipt of qualifying benefits in order to boost take-up, rather than requiring an application form.
- The Poverty and Inequality Commission say the Scottish Government will, in the long term, look at automating the best start grant and best start foods payments for those receiving the Scottish Child Payment.
- SAMH refer to potential to automate gathering evidence to support disability assistance claims but notes the importance of consent.
- Edinburgh Council suggested "improved data sharing to allow a single financial assessment across a range of benefits."
- Rights Advice Scotland suggest that if someone is awarded PIP, then they should automatically get the additional element in pension credit without the claimant having to inform the DWP themselves.
- The Action Group suggest that the 'Tell us once system' should be adapted for use for changes in circumstances so that all benefit agencies are informed
- Similarly, Independent Age ask whether 'Tell us once' could identify people eligible for pension credit
- Policy in Practice suggest that if someone receives less than the full state pension they should be invited to apply for pension credit

Advantages of automation

Data sharing was described by many as having the potential to make it easier for people to get the benefits they are entitled to. LITRG referred to the advantages of automation as being improved take-up and a more accurate and ideally, a more seamless system. NASS said that automatically awarding benefits would avoid stress and anxiety for applicants. CEMVO suggested that by adopting 'robotic process automation' used by DWP, claims would be processed in a non-biased way, freeing staff to do outreach and take-up work.

Malcolm Gardner and Phil Agulnik[11] suggest that beneficial automation requires more than just data matching. It also includes:

- Simplified application forms using known data from a range of sources and elements of machine learning to identify citizen's needs
- Real time analysis that can predict actual and likely change of circumstances – making deductions using statistical inferences from 'big data'
- Having systems with clear, shared expectations for data which make sharing it easier
- More direct communication with the citizen

Disadvantages

Most submissions see potential in greater automation but many are cautious – pointing out that it could disadvantage claimants. Inclusion Scotland referred to

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[11] Team Netsol ltd and Entitled To Ltd. Entitled To is an online benefits calculator.

Philip Alston's recent report[12] to the UN which warns of the detrimental impact of the way increased automation is being pursued largely as a cost cutting measure.

LITRG note that increased automation could lead to improved take up but concerns include: that the system is only as good as the data being used, that the individual cannot be held accountable for accuracy, it is reliant on digital skills which many people may not have, the costs of maintaining a secure digital environment need to be considered and there needs to be contingency for when the IT is interrupted.

Interestingly some of the same issues were cited as both advantages and disadvantages. For example automation was described as both reducing error and bias (CEMVO) and increasing it (JRF, LITRG). LITRG point out that error might be more difficult to identify and challenge in an automated system.

Impersonal
The impersonal nature of automated systems is problematic (Action Group, FAIR, Rights Advice Scotland). JRF note that: "Human advisors with robust knowledge of the system can assess the nuances of individual cases to identify eligibility in a way automation likely never could."

As mentioned, most submissions would like to see 'multiple application channels' (primarily so that those without IT skills or unreliable internet access can access benefits) whereas automated systems may make this less likely.

Error and Bias
There is a risk of inaccurate information being used (Advice Shop, Marc Allison, JRF, Marie Curie). For example, JRF say automation: "risks inflicting further damage on claimants through errors or by entrenching design flaws."

LITRG give the example of using of real time information (RTI) on earnings for UC and tax credits where data is sometimes wrong or incomplete. They note that given the automated nature of the system, it can be difficult for claimants to challenge these errors. They also point out that legal responsibilities do not always reflect the administrative arrangements. For example, HMRC are notified automatically when a disability benefit is awarded or stopped in order that the correct premiums can be applied to a tax credit award. However, when the process failed in 2016 families were not given fully backdated awards because legally it was still the claimants responsibility to inform HMRC about their DWP award.

On a similar theme, FAIR query whether someone can be held accountable for an overpayment of an automatically awarded benefit.

Data protection and human rights

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[12] UN OHCHR "World stumbling zombie like into digital welfare dystopia". Alston new report of digital welfare states and human rights (A/74/48037)

Data protection issues were mentioned briefly in many submissions but generally not discussed in depth. FAIR suggest that, due to data protection issues, it may be better to have "triggers that send forms to clients rather than automatic payment, as this may cause overpayments."

Gardner and Agulnik consider that "GDPR permissions should be incorporated into the data collection and the single application form to safeguard personal data." They state that: "one of the biggest blockers to take-up is data protectionism, whereby data owners create pseudo data protection rules that places blockers on the appropriate sharing of data."

SFHA think there is "potential" to automation but consider that the driver towards automation is "invariably" cost-cutting and that: "algorithms do not lend themselves to nuanced decisions based on dignity, fairness and respect."

As mentioned, Philip Alston's recent report considers the human rights implications of automation of welfare rights systems.

5.What can we learn from previous campaigns to increase take-up?

Many submissions give examples of campaigns and initiatives intended to increase benefits take-up. These are listed in the annex. The following pulls out common themes.

Take-up strategy coverage
CPAG suggested what a good take-up strategy would aim to do. This includes: raising and maintaining awareness, linking with advice services, being informed by data and driven by targets and be linked to wider social security and anti-poverty aims.

There was concern that the Scottish Government's take-up strategy only covers devolved benefits currently in payment (Engender). Given many Scottish benefits are passported from reserved benefits, CAS thought the strategy should cover both reserved benefits that are qualifying benefits for Scottish benefits as well as plans for the benefits yet to be introduced.

Targeted and tailored
Success is largely dependent on accurately targeting those likely to qualify, using a person centred, holistic approach and using up to date data (CIH, CPAG, CAS, Edinburgh Council, CRER). Data sharing can help with this, and many of the automated approaches referred to above are about data sharing to identify potential applicants.

Some submissions stressed the need to start small and local (CIHH, Enable, Poverty and Inequality Commission).

CPAG and CIHH refer to HMRC research on tax credits, which found that people did not realise it was a benefit.

Edinburgh Council point out that if campaigns aren't targeted then agencies can end up processing a lot of claims that do not qualify which increases administration costs.

Proactive, on-going and supported by advice
Providing initial information or signposting is not enough. Organisations need to be proactive in offering assistance and ongoing help so people can maintain a claim. This is particularly the case for complex benefits and vulnerable groups. (Action Group, CIHH, CPAG) Perth and Kinross Council refer to their successful pension credit campaign which involved experienced welfare rights workers doing a "comprehensive benefit check and checking other sources of support". They then supported people to make claims.

Campaigns need to be continuous (Gardner and Agulnik). SFHA noted that:

> "A take-up campaign will only work for the duration of the campaign. As soon as the funding ends all the good work ends and we are back to square one. If government funding is made available for campaigns then it needs to continue indefinitely"

Many submissions made the point that campaigns need to be backed up by advice work (eg: Edinburgh Council, Action Group, Enable, Highland Council) and/or link to more specialist advice and support (Action Group, Enable).

Partnership working
Partnership working was mentioned frequently (CIH, CAS, FAIR, Glasgow Council, Highland Council) in particular the need for links between more specialist agencies and generic services working with the same client group (Enable, Action Group, CIH, CEMVO).

Avoiding stigma
Campaigns should use positive, rights based language (Poverty and Inequality Commission). Age Scotland said the 'You've earned it campaign' was successful in 'getting round stigma.'

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

There was general agreement that different benefits and different client groups required different approaches. (For example: Argyll Community Housing, Rights Advice, Enable, Highland, Independent Age, JRF, Marie Curie, MS, National Carers, Poverty Alliance, Poverty and Inequality Commission).

Much of this reflects the view in answer to question 5 that take-up campaigns need to be tailored to different client groups.

However some point out that, while targeted information is needed, similar principles apply across all groups – eg awareness raising and linking to advice agencies (CPAG, CAS, Engender).

Some benefits are easier to target than others. For example, putting information on benefits for young children in schools or doctors surgeries would be obvious but it is less clear how to target information on benefits for low income workers (LITRG).

Inclusive, accessible communication is crucial and means that information needs to be presented in different ways. Some groups will need specialist support to access benefits (FAIR), or easy read/face to face information (Enable) For others its more a case of being aware of different preferences (eg older compared to young people) (Age Scotland, SFHA). CEMVO called for more resources for mainstream and ethnic minority led organisations to target benefit advice to ethnic minority communities.

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

There was a consistent message that benefits with simple criteria that are easy to claim are more likely to be taken up. Child benefit was often given as an example – being almost universal, simple to communicate and unchanging until the child grows up. Although Spicker notes that "it is not certain that their [state pension and child benefit] relative advantages can be transferred to other benefits."

Clarity is important. The National Carers Organisations say that the "criteria should be clear enough that individuals can quickly identify whether or not they could be eligible."

Some benefits are necessarily more complex. CPAG noted that:

> "if there cannot be a clear link between a person's situation and their benefit entitlement, it is better that eligibility criteria are fully and clearly defined in regulations."

While universalism is noted by most as encouraging high take-up, JRF noted that some means-tested benefits do have very high take-up rates (income support/ESA for families with children is 89%), saying that: "there is a delicate balance between focusing finite resources and minimising stigma and complexity."

LITRG note that people sometimes have to choose which benefits to claim due to the way benefits interact with each other[13], and this complexity affects take-up. They recommend that there should be a government provided eligibility checker. CPAG recommend that Social Security Scotland staff should use an eligibility calculator. Policy in Practice refer to projects that use their benefits calculator. The Committee also has a submission from Phil Agulnik, of 'Entitled to – a widely used benefit calculator.

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[13] Eg people cannot claim two 'income replacement' benefits at the same time. So you cannot get carer's allowance and the full amount of the state pension at the same time. However, there may be advantages to claiming 'underlying entitlement' to carer's allowance as it can give access to additional amounts in other benefits. This is just one example of the complex way benefits can interact.

Passported benefits (which includes much of current Scottish social security) are referred to by many as a good way to ensure take-up (eg Highland Council). However Glasgow Council notes that they can create 'cliff edges.' If someone loses entitlement to the reserved benefit then they lose both that and the passported benefit at once. Also take-up cannot exceed the take-up of the qualifying benefit (MS, JRF, Poverty and Inequality Commission).

Qualifying benefits which are long lasting and stable may be easier to use for passporting. UC awards are commonly used as a qualifying benefit for passporting but because they can change on a monthly basis, this can make UC more difficult to use as a qualifying benefit.   Related to this is Spicker's point that "each benefit needs to stand alone", so that failure of one doesn't jeopordise someone's entire income.

Glasgow Council's automatic award of school clothing grants is possible mainly because the eligibility criteria includes council tax reduction – which is under the control of the local authority. Perth and Kinross Council and Rights Advice Scotland note that had CTR been included as a qualifying benefit for Scottish social security, local authorities would be able to do more to encourage take-up, because they can target CTR recipients.

8. How might the development of Scottish social security impact on take-up of both reserved and devolved benefits?
Many submissions referred to the opportunity presented by the Social Security Scotland to increase take-up of both reserved and devolved benefits. (eg: CPAG, CAS, FAIR, Perth and Kinross Council, Poverty Alliance).

The positive ethos of Social Security Scotland and provision of locally based support by them was seen as an opportunity to increase take-up of Scottish benefits, other Scottish payments (CTR) and reserved benefits.

However, there is potential to cause confusion (eg CEMVO, Edinburgh Council, Enable, Highland Council, JRF, LITRG, Marie Curie, MND, Poverty Alliance). People may not know which agency to claim from and there may be different definitions and criteria used for similar concepts. Marie Curie refers to the different definitions being used for terminal illness.

The UK and Scottish administrations need to work closely together to:
- Cross refer cases to ensure people claim the most appropriate benefits (LITRG, Action Group, Age Scotland, Rights Advice, CPAG, MND).
- Advise on potential eligibility to both reserved and devolved benefits Rights Advice, CPAG, Engender, FAIR)
- Share data where entitlement to a benefit administered by one agency affects entitlement to benefits administered by the other (Action Group, Age Scotland, Rights Advice, CPAG).

MND Scotland state that: "it should not be incumbent on applicants to understand the differences between the two systems – no-one should fall between the gaps."

CPAG suggested that Social Security Scotland staff should have a high quality benefit checker covering UK and Scottish benefits, which could be used in combination with referrals to local advice agencies. Similarly Perth and Kinross Council noted that "simple, easy to use benefit calculators that are easily accessible would assist understanding of eligibility."

There also needs to be joint working between Social Security Scotland and existing advice agencies based on "seamless referral agreements" between them (Perth and Kinross Council).

Fiscal Framework

Inclusion Scotland and the Poverty and Inequality Commission raise concerns (already discussed in committee) that a take-up campaign could result in a claim of a policy spillover under the fiscal framework.

However JRF point out that neither awareness building activities nor improving administration are 'policy changes' and so should not result in demands for compensation. They consider that:

> "ensuring all who are eligible for [reserved] benefits have access to them is the responsibility of the UK government, so it is difficult to see how the principle of no detriment could apply." […] "This ambiguity must be resolved."

The Poverty and Inequality Commission state that:

> "assurances should be asked for from the UK Government, if necessary, that it will not seek reimbursement from the Scottish Government for additional costs related to people in Scotland taking up the reserved benefits to which they are entitled."

Instead of pursing clawbacks there should be joint work between UK, Scottish and local government to promote take-up (JRF).

While it may be difficult to demonstrate the impact of a take up campaign, a more straightforward example of a spillover would be where the rules which applied to Scottish social security affected the number of people eligible for a reserved benefit.

On this issue Inclusion Scotland are concerned that "any future relaxation or extension of entitlement criteria for devolved benefits that results in more people becoming entitled to the premiums or disregards of reserved, means tested benefits could result in claw-back by the UK government via the fiscal framework." On a similar theme, but operating in the opposite direction, LITRG used the example of Scottish income tax: if taxes were lower in Scotland then people would have higher net income. This could result in them having a lower UC award, which could save the UK government money.

Annex 1: Examples of initiatives to increase take-up of benefits

Promotion at launch or change of benefit rules
- Haringey Council: used large administrative data sets (the LIFT dashboard) to target people possibly eligible for pension credit prior to the rule change on couples age, achieving £2.3m additional benefit. (Policy in Practice)
- Communications around the first BSG grant resulted in large number of applications (CPAG)
- Pension credit awareness raising campaign in 2003 used data matching to target potentially eligible people, using direct mail, TV and press. (CPAG)
- Promoting supplementary benefit to ensure people received transitional protection from the change to income support in 1988. This included printing an advert/claim form in newspapers and later printing an appeal letter. (Rights Advice Scotland)

Locally based projects/projects in partnership with other public services
- NHS Greater Glasgow and Clyde 'healthy wealthier children' refer families to local advice agencies who are funded to provide income maximisation (CPAG)
- Deep End Advice Worker projects based in two GP practices in Glasgow resulted in £850,000 additional benefit payments over two years (CPAG)
- Families apply for BSG when registering a birth in Glasgow (CPAG, Glasgow Council)
- Glasgow Council's 'universal credit hubs' have had 4,500 'interactions' with clients securing £10.5m in financial gains.
- Glasgow Council: automated award of school clothing grant based on HB/CTR information.
- Glasgow Council partnership with Macmillan Cancer Support since 2008. Has supported 29,400 clients achieving financial gains of £74m (Glasgow Council, Macmilllan Cancer Care)
- Improving the cancer journey has supported 6,665 clients and made financial gains of £14.7m (Glasgow Council and Macmilllan Cancer Care)
- In development: Glasgow Council: financial education programme will work with schools to increase awareness of young people and parents of the grants and benefits available to them.
- 'Building Connections' – a JRF demonstration co-location project in Glasgow dealt with 707 referrals and achieved nearly £1m in financial gain.
- Highland Council: midwifery project provides income maximisation for all pregnant women and advises on additional benefits available after a baby is born
- current project to promote pension credit via winter flu vaccination clinics (Scottish Public Health Network)
- Welfare advice health partnerships in general practice in Edinburgh and Dundee generated £39 for every £1 spent (Inclusion Scotland – referring to Kate Burton's evidence to Committee 12th June 2019)
- Hartlepool action lab: working with local providers and local advice agencies targeting 500 houses in an area of high deprivation. Framed as

a challenge: aiming to generate benefit of £1m to people across the town in 100 days (JRF)
- Guinness Housing Association – using benefits calculator so that staff coming into contact with vulnerable claimants can help them access benefits without having to be expert welfare rights advisers (Policy in Practice)
- Menu for Change: cash rights food project produced a referral pathway leaflet, benefit advice at food bank referrers and a phone advice line in East Ayrshire (SFHA)

Other income maximisation projects/campaigns
- Money Talk Team (formerly financial health check) (CAS) reaching 3,389 clients achieving £2.5m financial gain.
- Welfare Reform Mitigation Project (CAS). 37,000 clients achieving £14.6m financial gain.
- Since 2013 Enable Scotland welfare rights gained £5m for 1,341 clients with a learning disability
- Northern Ireland Department of Communities: £4.4m invested generated £50m for over 15,000 people (JRF)
- Perth and Kinross Council: pension credit campaign which involved experienced welfare rights workers doing a "comprehensive benefit check and checking other sources of support". They then supported people to make claims.
- Greenwich Council uses administrative data to target households likely to be eligible, and has, for example, increased take-up of severe disability premium. Previous campaigns based on phone calls and mail shots were resource heavy and got only a 10% response rate (Policy in Practice)

Examples of not so successful initiatives
Some submissions also includes examples they considered had not been successful.
- Benefit bus or surgery had limited success – people didn't want to be seen approaching the service (Rights Advice Scotland).
- Compare 'you've earned it', a marketing campaign, with 'money talks' providing personalised advice and income maximisation. The former generated £1 for every £2 spent, whereas the latter generated £4 for every £1 spent (Inclusion Scotland)
- [Pension credit payment study](#) (2012) identified people likely to be eligible for pension credit, and paid them an estimated amount for 12 weeks. However this did not appear to particularly increase the likelihood of making a claim at the end of that time (referred to by Spicker)

Annex 2: Other questions the Committee could consider
Question 9 asked whether there are other questions you think the Committee should consider as part of this inquiry?

These are listed below grouped into broad themes.

Advice
- What role can specialist benefits advice delivered by the community and third sector play in maximising benefit take-up and how does this differ from advocacy services? (Action Group)
- How should specialist benefits advice be funded? (Action Group)
- What part can the advice sector play in the take up of both reserved benefits and devolved benefits? What work is currently being done and what resources would be required to fill any gaps? (Rights Advice Scotland)
- Capacity of advice providers to react to an increased workload that a take up campaign may require and to consider what funding wold be needed (Rights Advice Scotland)
- Scope for partnership working between Scottish Government and local authorities (Rights Advice Scotland, Policy in Practice).
- The need to continue to fund bespoke advice services tailored to particular client groups (Enable)
- Is there a commitment to fund advice services (FAIR)
- Is there a commitment to work with third sector to encourage benefit take up (FAIR)
- Whether welfare rights advice is adequately supported (Poverty Alliance, SCoRSS)
- How can advice and expert help be provided locally (West Lothian Council)

Local Authorities
- Role of local authorities in promoting take-up (Advice Shop)

Social Security Scotland
- How can Social Security Scotland ensure that the agency has a human face that is approachable, particularly when issues arise? (Argyll Community Housing Assoc)
- If benefit eligibility is identified at a later stage, is backdating allowed for Scottish social security benefits? (Stirling Council

Take-up Strategy
- The take-up strategy needs to look at the benefits due to start – not just the ones currently in payment (Engender)
- How will we reach people that are marginalised (FAIR)
- How to shape public attitudes towards benefits – to reduce stigma (Poverty Alliance)
- How people with lived experience and deliver actions to boost take up eg partnerships with community organisations (Poverty Alliance)
- Role of trade unions and employers in promoting benefits (Poverty Alliance)

UK and Scottish Governments
- Committee could explore how the UK and Scottish Governments work together on take-up (CPAG)
- What is the role of the SG in promoting take up of reserved benefits (Poverty Alliance, SCoRSS)

Other
- What is the cost of processing multiple benefits against the gain for individuals (Edinburgh Council)
- Interaction of benefits with income tax and national insurance – this is particularly complex given the partial devolution of income tax (LITRG)
- Explore the interaction between benefits stigma and mental health stigma (See Me)
- How a basic income would help the unemployed find or start a business and what help would there be for people on basic income? (West Lothian Council)
- Consider making all financial support thresholds the same – eg fsm, clothing grant, ema. Different thresholds mean multiple applications are needed (West Lothian Council)

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SPICe
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