

26 February 2013

Mr Simon Stuart,
The Social Security Agency,
Department for Social Development,
The Lighthouse Building,
1 Cromac Place,
Gasworks Business Park,
Ormeau Road,
BELFAST
BT7 2JB

Dear Mr Stuart,

Re: Department for Social Development consultation: *Maximising Incomes and Outcomes – A Plan for Improving the Uptake of Benefits.*

The Equality Commission for Northern Ireland welcomes the opportunity to respond to the above-mentioned consultation document. We wish to acknowledge the range of steps that the Department has taken and further proposes to encourage knowledge and awareness of benefit entitlement among a number of equality groups including older people, disabled people, carers and families (people with dependants).

We note the positive consideration of key inequalities and the barriers to benefit entitlement experienced by vulnerable groups identified as a result of evaluation of previous benefit take-up campaigns.

The Commission concurs with the Department's research findings that the aforementioned groups are most at risk of poverty and likely to have unclaimed entitlement. We therefore welcome the decision to directly target these groups as part of the benefit take-up campaign.

We acknowledge the key elements proposed within the plan:

- the continued funding of independent organisations to provide benefit information and advice;
- the partnership arrangements with the voluntary and community sector to deliver benefit entitlement check-up assessments; and
- the Department's "Make the Call" advertising campaign,

as positive steps towards addressing the inequalities in accessing benefits experienced by these equality groups.

Nonetheless, the Department's admission that the measures adopted have resulted at the midway stage of its current campaign (42% of claimants contacted so far) in only 14 % of claimants undertaking a benefit 'check-up' assessment and, of these, only 6% receiving additional benefits, is a cause for concern.

Recommendations

We propose that the Department take a number of additional steps in order to increase take-up of benefits by the potential claimants, in particular the groups identified in the Department's discussion paper.

Our recommendations are detailed below:

(i) Target Groups

The discussion paper makes particular reference to the policy intent of the welfare reform measures to encourage greater number of claimants to return to the labour market. It is important to note that many potential claimants experience 'in work poverty' and should therefore be included as a key target group when considering measures to address unclaimed benefit entitlement.

(ii) Multiple Identities

We would encourage the Department to pay particular attention to the multiple identities within the particular target groups identified e.g. young people with disabilities who have left residential care, those with complex support requirements such as people with learning disabilities, those potential claimants for whom English is an additional language as a result of their ethnicity or their disability i.e. for many deaf people, sign language is the preferred form of communication/their only means of communication.

(iii) Awareness Campaign

The Commission notes that the Department's media campaign in the form of television advertisements has focused primarily on the benefit

entitlements of older people. We would recommend that this focus should be extended to include other key target groups such as disabled people and carers

Independent research which examined the public perception of disabled people and their entitlement to a range of state benefits concluded that there was an increasing belief among the general public and popular media that disabled people “were benefit cheats and scroungers”¹.

Any media campaign undertaken by the Department must be mindful of the fact that elements of the media coverage associated with the welfare reform measures has increased negative attitudes towards benefit claimants, including those from the target groups identified by the Department’s research.

This phenomenon is likely to generate increased reluctance among potential claimants with regard to claiming their benefit entitlement.

Furthermore, the Department correctly acknowledges that there is a degree of mistrust among claimants to disclose personal information regarding their benefit entitlements in the belief that these will be reduced or removed.

We would recommend that the Department consider a campaign which includes positive images of the target groups acknowledging that some potential claimants will have a genuine potential entitlement to benefits which they are not currently claiming.

(iv) Thematic Focus Groups

The Department may also wish to consider additional focus groups facilitated by the voluntary and community sector, targeted at those equality groups who have been identified as being of greater risk of poverty, taking account of potential claimants living in rural areas, those with specific types of disability, carer support groups, black and minority ethnic communities, older persons networks and family and parent support groups.

¹ Briant E., Watson, N, and Philo, G. (2011): *Bad News for Disabled People: How the Newspapers are reporting disability*, Strathclyde Centre for Disability Research and Glasgow Media Unit, main findings, pages 4-5 and summary of conclusions and observations, pages 5-14. Available at: <http://www.inclusionlondon.co.uk/bad-news-for-disabled-people-report-reveals-extent-of-media-misrepresentation>.

The research noted that disabled people in receipt of Incapacity Benefit were dismissed by participants as making a lifestyle choice a theme reflected in elements of the popular press and that such accusations have been repeatedly used by Government Ministers more generally to promote the case for welfare cuts are now being targeted at disabled people specifically.

Consideration should also be given to the need to consider the timing of focus group meetings to ensure that not all take place within working business hours thereby enable participation by potential claimants who are working but are on low incomes.

Such meetings could be used to provide general awareness of benefit entitlement with an option to focus on individual cases so that those who do not wish to reveal their own particular circumstances are able to retain a degree of anonymity if they so wish. This may help alleviate, to some degree, the mistrust among some potential beneficiaries encountered by the benefit take-up campaign. Such an approach may also encourage individuals to undertake the benefit check-up assessment as a result of the additional information received.

(v) Digital Inclusion

The Department's discussion paper emphasises the increasing shift towards the utilisation of new technology in future benefits assessment.

Whilst we are aware of the growing number of claimants who use technology to maintain their benefit entitlement and to self assess their entitlement to other potential benefits, community and voluntary organisations in Northern Ireland report lower internet usage by older people and people with sensory disabilities than by the general population.

A 2011 survey on Internet usage by the Office for National Statistics revealed that, in Northern Ireland, people with a disability (46.3%) were much less likely than non-disabled people (77.4%) to have ever used the internet².

The figures also reveal that Internet usage amongst disabled people here is less than the UK average for people with disability (63.8%).

The Commission recommends that Department should consider the measures and investment necessary to ensure the digital inclusion of disabled people and older people.

(vi) Home visits

We acknowledge the work undertaken by the Department and others to follow up measures undertaken beyond the initial correspondence with

² Office for National Statistics (2011): *Internet Access Quarterly Update 2011, Q1*. The disaggregated figures for disabled people in Northern Ireland contained in the raw data for this survey were unpublished and were obtained by Disability Action from the ONS in May 2011.

claimants regarding their opportunity for a benefit check-up. Care needs to be taken to ensure that potential claimants also benefit from face to face contact where the need is identified, including, where necessary, consideration of home visits. People with complex needs and those for whom English is an additional language are likely to require additional support. Follow up telephone calls may not fully address their particular circumstances or communication requirements.

As the Department is aware that some potential claimants may be unable to attend one-on-one interviews away from the home due to their disability or their caring responsibilities. Every effort should be made to ensure that these potential claimants are not disadvantaged by proposed new arrangements associated with the benefit entitlement and maintenance system e.g. the increasing emphasis on the use of call centres, on-line claims self assessment, and greater reliance on the internet in general.

The Commission recommends that the Department should give additional consideration to the value of outreach activity such as home visits and door-to-door information and advice campaigns to ensure all claimants are aware of their entitlement to benefits and to have their information support requirements fully addressed.

Conclusion

The Commission would like to commend the Department for the measures it has already adopted in relation to the benefit take-up campaign and its intention to maximise incomes in particular for traditionally economically excluded groups such as those identified target groups.

We hope our comments will be given appropriate consideration by the Department and that they may be helpful in assisting the further progression of the benefit take-up campaign.

The Commission would be happy to offer the Department any further advice and information regarding the equality considerations set out in the discussion paper. We look forward to learning of the outcome of this consultation exercise and the proposed enhancements to the benefit take-up campaign.

Yours sincerely

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