

One Parent Families Scotland,
13 Gayfield Square,
Edinburgh EH1 3NX

11th June 2008

SSAC,

**Social Security (Lone Parents and Miscellaneous Amendments)
Regulations 2008**

Dear Colleagues,

I would like to submit the following comments on this consultation.

Compulsion

One Parent Families Scotland is still extremely unhappy about the compulsion introduced by the regulations.

Transition Arrangement for parents

We are opposed to the idea that lone parents should be required to take out a loan to cover the change in payment arrangements from weekly to fortnightly. Given the intention to encourage lone parents to enter employment it would be far better to give a week run on of benefit which would help families with the initial costs of entering employment. We are not convinced by the arguments that this would not be operationally possible or an appropriate use of public money, particularly in the context that the commitment to reduce child poverty is not being met. It will also create difficulties for parents who are already paying back crisis loans or have other indebtedness.

Exceptions

Lone Parents With Lower Level DLA: Since the evidence is that there is only a 50% take up of child DLA, it is vital that lone parents are given information on DLA and assistance with the claims process to ensure that all those entitled to Middle and higher level DLA are able to access it. This should also include reviews of lone parents with lower level DLA to ensure that they are getting the correct benefit.

Home Educators: We believe that lone parents who educate their children at home should be exempt from the requirements. Such parents are already saving the state very significant state costs. In many cases they are also responding to difficulties which the child has experienced with the school system. Given the poor state of children's mental health in the UK, it is important that parents should have the freedom to educate at home if they wish. It is also very unrealistic to expect them to be able to do this and to work 16 hours weekly.

Childcare in Scotland

In Scotland lone parents do not have a legal entitlement to childcare similar to that embodied in the Childcare Act. This disadvantages all lone parents and those with a disabled child particularly as there is currently only patchy provision of care for disabled children in Scotland. One Parent Families

Scotland has developed extended hours childcare, available 7 days a week in the child's own home between 7am and 10.30pm, but we are struggling to maintain these services, yet many entry level jobs require unsocial hours working. There is also a difficulty with a lack of youth facilities in school holidays. In cities such as Edinburgh local authority run youth activities in school holidays have just been axed in response to budget deficits. At a time when the criminal justice system is under great strain lone parents will be less available to supervise their young people, creating a risk of greater involvement in crime and anti-social behaviour. The implication is that if childcare is less available here than in England, lone parents will be disadvantaged as to the work they can obtain, with an impact on child poverty. We have requested that the impact of these measures on child poverty should be monitored separately for England, Scotland, Wales and Northern Ireland, but we have had no re-assurance on that being planned.

Change of Circumstances

Para 4.59 makes no mention of children experiencing difficulties at school which may result in their temporary or permanent exclusion. If such difficulties are not accepted as a reason to leave employment, parents may be put in an impossible situation.

Sanctions

The 40% sanction rate will inevitably cause stress and poverty to vulnerable families and we feel that a sanction of 20% would have been more appropriate in the context of reducing child poverty.

Transition to Employment Support Allowance: In relation to para 6.16, it should be noted that parents on ESA could be £400 a year worse off. In addition for those on the long term rate contributions based arte, there will be a loss of age additions, which could result in significantly lower income. This also will worsen child poverty.

Students and skills

Lone parents on Income Support have lower educational qualifications than women who are partnered, yet require a higher level of earnings for employment to be sustainable. The concessions in the regulations for parents who are already in full time education are inadequate for other lone parents who need to undertake higher level courses to access employment, but may not have enough time to do these before they are subject to the very restrictive JSA regulations. We already know that a significant number of children in poverty are in working families and also that lone parents are more likely to leave employment than other JSA claimants. This approach to education will not help lone parents to obtain sustainable jobs.

Country based monitoring

While we welcome the aspects of the regulations which do offer more flexibility for lone parents than for other JSA claimants, we would argue that all aspects of the operation of the new system should be monitored on a country basis to help devolved administrations to respond to implementation problems. This would acknowledge that many of the vital support services for

lone parents returning to work will be differentially available under devolved powers.

Lone Parent engagement in monitoring

We would like to see systematic arrangements in place to obtain feedback from lone parents on the impact of the new regulations on a country by country basis for the same reason.

Sue Robertson,
Director