



Close the Gap response to the Social Security Committee inquiry into social security and in-work poverty August 2018

INTRODUCTION

The experience of both poverty and social security are heavily gendered. A number of structural factors place women at greater risk of poverty and the recently published Child Poverty Delivery Plan recognises that there is “conclusive evidence that poverty and gender are inextricably linked”.¹ Social security has a significant impact on women’s economic, political and social equality, on their ability to participate in paid work, and their experiences of unpaid care and violence against women. We would therefore strongly urge the Committee to adopt a gender lens when analysing the impact of Universal credit on in-work poverty.

Over the decade of austerity from 2010 to 2020, 86% of net ‘savings’ raised through cuts to social security will come from women’s income, placing women at a greater risk of deeper and sustained poverty. The UK Government’s ‘welfare reform’ programme and wider agenda of public sector spending cuts is having a grotesquely disproportionate impact on women’s access to resources, security and safety.²

While it is well-evidenced that ‘welfare reform’ has severely disadvantaged women, it must be recognised that women did not enjoy economic equality with men before ‘welfare reform’. The imbalance in impact can be explained by women’s pre-existing inequality:

¹ Scottish Government (2018) *Every Child, Every Chance: The Tackling Child Poverty Delivery Plan* available at <https://www.gov.scot/Resource/0053/00533606.pdf> Accessed August 2018

² Engender (2016) *Securing Women’s Futures: Using Scotland’s New Social Security Powers to Close the Gender Equality Gap* available at <https://www.engender.org.uk/content/publications/Securing-Womens-Futures---using-Scotlands-new-social-security-powers-to-close-the-gender-equality-gap.pdf> Accessed August 2018

- In Scotland the gender pay gap is 15%³ and two-thirds of workers earning below the Living Wage are women⁴
- Women have fewer financial assets and less access to occupational pensions than men, and women are 66% of the paid workforce living in poverty in Scotland⁵
- Women provide around 70% of unpaid care⁶ and 74% of Carer's Allowance claimants are women.⁷ Women are twice as likely to give up paid work in order to care.⁸
- 92% of lone are women, and women make up 95% of lone parents in receipt of income support. Almost half (48%) of single-parent households are living in poverty, compared to a quarter (24%) of couple households⁹
- Women in the UK find it harder than men to escape poverty and they are more likely to be in persistent poverty (8.2%) than men (6.3%)¹⁰
- Women are twice as dependent on social security as men, with 20% of women income coming from the benefits and tax credit system, compared with 10% of men's¹¹
- Women represented roughly two-third of those with severe debt problems in the UK in 2013¹²

³ Close the Gap (2015) *Gender pay gap statistics*

https://www.closesthegap.org.uk/content/resources/1430321086_CTG-Working-Paper-14--Gender-Pay-Gap-Statistics.pdf

⁴ Poverty Alliance "Why is the Living Wage Important?" Available at

http://slw.povertyalliance.org/about/why_is_it_important Accessed August 2018

⁵ CPAG (2014) *Poverty in Scotland 2014: The independence referendum and beyond*

⁶ Skills for Care (2012) *Carers Matters – Everybody's business* available at

<https://www.skillsforcare.org.uk/Document-library/Skills/Carers/Partone.pdf> Accessed August 2018

⁷ Carers UK (2014) *Caring and Family Finances Inquiry: Carers struggling with alarming levels of hardship*

available at <https://www.carersuk.org/news-and-campaigns/press-release-rss/580-nation-s-carers-struggling-with-alarming-levels-of-hardship> Accessed August 2018

⁸ The National Carers Organisations (2013) *Submission to the Expert Group on Welfare* available at

<https://www.carersuk.org/for-professionals/policy/expert-comment/61-scotland/response/3286-national-carer-organisations-submission-to-the-expert-group-on-welfare> Accessed August 2018

⁹ Engender (2012) *Multiple Jeopardy: The impacts of the UK Government's proposed welfare reform on women in Scotland* available at

<https://www.engender.org.uk/content/publications/Multiple-Jeopardy-Briefing-paper.pdf> Accessed August 2018

¹⁰ Women's Budget Group (2018) *The Female Face of Poverty: Examining the Cause and Consequences of Economic Deprivation for Women* available at

<https://wbg.org.uk/wp-content/uploads/2018/07/FINAL-Female-Face-of-Poverty.pdf> Accessed August 2018

¹¹ The Fawcett Society (2006) *Who benefits? A gender analysis of the UK benefits and tax credit system*

¹² Women's Budget Group (2018) *The Female Face of Poverty: Examining the Cause and Consequences of Economic Deprivation for Women* available at

<https://wbg.org.uk/wp-content/uploads/2018/07/FINAL-Female-Face-of-Poverty.pdf> Accessed August 2018

In its inquiry into women and welfare reform, the Scottish Parliament's Welfare Reform Committee acknowledged the importance of taking a gendered approach and made a range of recommendations including on occupational segregation, childcare, child poverty and mental health.¹³ We would urge the Committee to take a broad approach for this inquiry.

Close the Gap is part of a coalition of women's organisations, led by Engender, which has highlighted the acute gender impact of 'welfare reform' and which advocate for a gendered analysis in the design and implementation in the new Scottish system. This previous work informs this consultation response.

CONTEXTUAL FACTORS

1. Women's experiences of in-work poverty

The experience of poverty is gendered. Female headed households are poorer than comparable male-headed households¹⁴ and women in the UK are more likely to live in poverty than men. Women also tend to be 'poverty managers' and will often shield their families from poverty by going without food, clothing or warmth themselves.¹⁵

Recent work by the Women's Budget Group outlined that in-work poverty¹⁶ can be caused by a combination of low earnings (the number of hours worked may be insufficient to guarantee a good income) and low pay (what people are paid per hour is insufficient for an adequate standard of living) as well as a number of other factors that relate to labour market participation of household members and financial support.¹⁷

Women's employment is increasingly precarious, contributing to women's higher levels of in-work poverty. Women comprise the majority of low paid workers, and work that is seen as "women's work", such as cleaning, care and

¹³ Welfare Reform Committee's Women and Social Security Inquiry available via the Scottish Parliament website: <http://www.parliament.scot/parliamentarybusiness/CurrentCommittees/87833.aspx> Accessed August 2018

¹⁴ Ibid

¹⁵ Women's Budget Group (2018) *The Female Face of Poverty: Examining the Cause and Consequences of Economic Deprivation for Women* available at <https://wbg.org.uk/wp-content/uploads/2018/07/FINAL-Female-Face-of-Poverty.pdf> Accessed August 2018

¹⁶ In-work poverty is defined as individuals living in households where the household income is below the poverty threshold despite one member of the household working either full or part time. The poverty threshold is defined as under 60% of the average household income (before housing costs).

¹⁷ Women's Budget Group (2018) *The Female Face of Poverty: Examining the Cause and Consequences of Economic Deprivation for Women* available at <https://wbg.org.uk/wp-content/uploads/2018/07/FINAL-Female-Face-of-Poverty.pdf> Accessed August 2018

retail, is systematically undervalued in the labour market. Workers on zero-hours contracts (ZHCs) are more likely to be women. Women are more likely than men to have caring responsibilities and therefore face the additional pressure of finding work that allows them to balance earning with caring. This sees women further concentrated into low paid and insecure work, as most part-time is found in the lowest paid occupations and sectors. These factors mean that paid work is not a guaranteed route out of poverty for women in Scotland.

To unpack the impact of Universal credit on women, it is essential that an intersectional approach is adopted. For example, disabled women and black and minority ethnic (BME) women face dual labour market disadvantages and are affected by social security policy in cross-cutting ways. Disabled women and BME women are also more likely to live in poverty than disabled and BME men.¹⁸ Moreover, as BME women are more likely to live in larger households and head single-parent households, they have been hit particularly hard by tax credit cuts and the two-child limit.¹⁹

ANSWERS TO QUESTIONS

Question 2: What impact will Universal credit have on in-work poverty in Scotland?

The significance of universal credit on the lives of women and their experiences of in-work poverty is illustrated by the fact that 37% of claimants in employment and 50% of claimants are female.²⁰ Despite the clear differential impact on women, the design of Universal credit fails to take account of gendered patterns of employment and care. For low-paid women, work alone is not providing an adequate route out of financial hardship.

¹⁸ Engender (2016) *Securing Women's Futures: Using Scotland's New Social Security Powers to Close the Gender Equality Gap* available at <https://www.engender.org.uk/content/publications/Securing-Womens-Futures---using-Scotlands-new-social-security-powers-to-close-the-gender-equality-gap.pdf> Accessed August 2018

¹⁹ BG and Runnymede Trust (2017) *Intersecting inequalities: The impact of austerity on Black and Minority Ethnic women in the UK* available at <https://www.intersecting-inequalities.com/> Accessed August 2018

²⁰ Department of Work and Pensions – Universal Credit Statistics: Data to 14 June 2018 available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/725762/universal-credit-statistics-to-14-june-2018.pdf Accessed August 2018

The earnings disregard

The design of the earnings disregard²¹ means that it fails in its core objective and will not “make work pay” for many lone mothers and second earners, the majority of whom are women. Universal credit creates little or no incentive for second earners to enter or progress in paid work and the work allowance²² for lone parents is too low. Disincentivising women from progressing in employment and from increasing their working hours ultimately restricts their earning potential, often trapping women and their families in in-work poverty. It also reinforces the notion of the “breadwinner model” which entrenches inequality within the household and reduces women’s financial independence.

Split payments and access to an independent income

Assumptions that opposite sex couples own, access and control joint bank account on an equal basis are unfounded and therefore the single household payment of universal credit has left many women with no independent access to an income.²³ Financial independence is crucial for women, who are twice as dependent on social security as men due to gendered caring roles and disadvantage in the labour market.²⁴

Women who face multiple inequalities across society, including disabled women, minority ethnic and refugee women are amongst those who would be at particular risk of increased harm from a policy that undermines women’s access to resources. Accessing Universal credit and achieving financial independence is necessary to enable women to escape not only poverty, but also domestic abuse.

We are pleased that the Scottish Government has committed to split payments of Universal credit under the flexibilities of universal credit. This is extremely

²¹ The ‘earnings disregard’ is income exempt from total amounts used to calculate benefit entitlements. The single earnings disregard under Universal Credit (UC) may disincentivise second earners from entering the labour market.

²² A work allowance is the amount that you can earn before Universal Credit payments are affected. Those with responsibility for a child or limited capacity to work are eligible for a work allowance. Once you earn more than your work allowance, Universal Credit payments are reduced at a steady rate - this earnings taper is currently set at 63%.

²³ Engender (2016) *Securing Women’s Futures: Using Scotland’s New Social Security Powers to Close the Gender Equality Gap* available at <https://www.engender.org.uk/content/publications/Securing-Womens-Futures---using-Scotlands-new-social-security-powers-to-close-the-gender-equality-gap.pdf> Accessed August 2018

²⁴ Engender (2015) *A widening gap: women and welfare reform* available at <https://www.engender.org.uk/content/publications/A-Widening-Gap---Women-and-Welfare-Reform.pdf> Accessed August 2018

important if the Scottish system of social security is to provide women with independent access to an income and to supplement pay to lift themselves and their family out of in-work poverty.

Carer's Allowance disincentivises paid work

It is estimated that around 70% of unpaid carers are women, despite Census statistics that put this figure at 59% in Scotland, as gender norms also mean that women are less likely to self-identify as carers.²⁵ Women make up the majority of carers in Scotland across all age groups and this is particularly acute amongst working-age women between 25 and 49 years old where they represent almost two thirds of carers.²⁶ Increasingly, women are combining looking after young children with providing unpaid care for older and disabled people.

Across the UK, £1bn will be cut from carers' incomes between 2011 and 2018²⁷ and Carer's Allowance is set at the lowest rate for any income replacement benefit, amounting to only 25% of the minimum wage. A low earning disregard within Carer's Allowance can act as a financial disincentive to take up paid work where this is possible.²⁸ The earnings threshold does not automatically align with the minimum wage and carers whose earnings rise suddenly over the weekly threshold by just a few pounds are then forced to choose between reducing their hours, giving up work, or losing their benefits. This means that women who provide care are discouraged from increasing their hours or securing higher paid work due to the loss of their benefits, ultimately trapping them in in-work poverty.

Disabled women, low paid work and benefit cuts

In addition to the barriers faced by all disabled people, disabled women face a raft of additional barriers because of their gender. These issues are reflected in an average pay gap of 22% compared with non-disabled men, (as opposed to

²⁵ Ibid

²⁶ Scottish Government (2015) *Scotland's Carers*

²⁷ Carers UK (2014) *Caring and Family Finances Inquiry: Carers struggling with alarming levels of hardship* available at <https://www.carersuk.org/news-and-campaigns/press-release-rss/580-nation-s-carers-struggling-with-alarming-levels-of-hardship> Accessed August 2018

²⁸ Carers UK (2014) *State of Caring 2014* available at <https://www.carersuk.org/for-professionals/policy/policy-library/state-of-caring-2014> Accessed August 2018

11% for disabled men).²⁹ Many disabled women also report that partners control their access to benefits and that this increases their isolation.³⁰

Disabled people are at greater risk of being employed in low-paid work and being underemployed. In terms of working hours, disabled women are much more likely to work part-time (48%) than disabled men (18%) and non-disabled women (42%).³¹ A lack of quality part-time jobs and flexible working, particularly at senior levels, means that part-time work is overwhelmingly found in low paid work.³²

Disabled women's labour market inequality is compounded by the fact disabled women are amongst the very hardest hit by welfare reform.³³ Over half of the cuts to benefits between 2010 and 2015 fell on disabled people and their families. In 2015, 55% of those on personal independence payments (PIP) in Scotland were women, as were 65% of those in receipt of Attendance Allowance.³⁴ Disabled women face higher living costs as a result of their disability³⁵ which, when combined with benefits cuts and high rates of part-time, low paid work means that in-work poverty rates are likely to rise for disabled women under Universal credit.

Lone parents and in-work poverty

Changes to child benefit, child tax credit, Income Support, maternity benefits and the benefit cap will all have a significant impact on women with children and gender equality more broadly. For example, of households subject to the benefit cap, 93% have children, 72% are lone parents (76% with children under five and 31% with a child under two).³⁶ Those with children under 3 are not

²⁹ EHRC (2010) *How fair is Britain? The First Triennial Review* available at <https://www.equalityhumanrights.com/sites/default/files/how-fair-is-britain.pdf> Accessed August 2018

³⁰ TUC and Women's Aid (2015) *Unequal, Trapped and Controlled: Women's experiences of financial abuse and potential implications for Universal Credit*

³¹ Ibid

³² Close the Gap (2018) *The Gender Penalty: Exploring the causes and solutions to Scotland's Gender Pay Gap* <https://www.closesthegap.org.uk/content/resources/The-Gender-Penalty-Feb-2018.pdf>

³³ Engender (2016) *Securing Women's Futures: Using Scotland's New Social Security Powers to Close the Gender Equality Gap* available at <https://www.engender.org.uk/content/publications/Securing-Womens-Futures---using-Scotlands-new-social-security-powers-to-close-the-gender-equality-gap.pdf> Accessed August 2018

³⁴ Ibid

³⁵ JRF (2016) *"In-work Poverty Hits Record High as the Housing Crisis Fuels Insecurity"* available at <https://www.jrf.org.uk/press/work-poverty-hits-record-high-housing-crisis-fuels-insecurity> Accessed August 2018

³⁶ Graham, Alison (2018) *"Something Needs Saying About Universal Credit and Women – it is Discrimination by Design"* available at <http://cpag.org.uk/content/something-needs-saying-about-universal-credit-and-women-%E2%80%93-it-discrimination-design> Accessed August 2018

required to look for work under Universal credit³⁷, yet they are still impacted by the cap.³⁸ Additionally, the so-called rape clause ultimately makes women choose between traumatising forced disclosure of rape and deeper impoverishment.

The main rate freeze on most working age benefits and tax credits has been extended for four years from April 2016. This includes child benefit and child tax credit, and also affects the childcare components of working tax credit and universal credit. The UK Government's own impact assessment shows that women will be disproportionately affected by this, with 33% of women suffering a loss of income in real terms.³⁹ Research shows that the benefit freeze could lead to a 12% loss of income for households with children.⁴⁰

This will reduce access to childcare for low-income families, which is already prohibitively expensive for many. It will also lock women with young children out of opportunities to work or study. Lone parents are already more likely to be in low-paid, part-time work, to compound this low pay with benefit cuts and increased childcare costs will increase rates of in-work poverty.

Question 4: What can, or should the Scottish Government do to mitigate any detrimental impact?

The devolution of a number of powers over social security provides an opportunity for the Scottish Government to make progress against commitments on gender equality and has provided an opportunity to pause and take stock of ways in which social security and specific welfare reform measures in particular have increased women's inequality.

The evidence is clear that Universal Credit will disproportionately impact women and will worsen their experiences of in-work poverty. However, women primarily face higher risk of in-work poverty because of the persistent inequalities that they face in the labour market. In mitigating the impact of

³⁷ The Universal Credit requirements of the lead carer is dependent on the age of the youngest child. There is no expectation to look for work until the youngest child is three. When the youngest child is age two, there is an expectation that the lead carer will take steps to prepare for work which includes attending work focused interviews and work preparation activities.

³⁸ Graham, Alison (2018) "Something Needs Saying About Universal Credit and Women – it is Discrimination by Design" available at <http://cpag.org.uk/content/something-needs-saying-about-universal-credit-and-women-%E2%80%93-it-discrimination-design> Accessed August 2018

³⁹ DWP (2015) *Impact Assessment - Welfare Reform and Work Bill: Impact assessment of the benefit rate freeze* available at <https://www.parliament.uk/documents/impact-assessments/IA15-006C.pdf> Accessed August 2018

⁴⁰ The Children's Society (2016) *The future of family incomes: How key tax and welfare changes will affect families to 2020* available at <https://www.childrensociety.org.uk/what-we-do/resources-and-publications/the-future-of-family-incomes-how-key-tax-and-welfare-changes> Accessed August 2018

Universal Credit, Scottish Government must also consider the barriers that women face in accessing decent, flexible work with an adequate income and take targeted action to address the root cause of the problem.

We recommend that, in order to mitigate the detrimental impact of universal credit, the Scottish Government should:

Design and Delivery of Social Security and Employability Programmes

- **In implementing split payments, payments should be paid to individuals automatically with entitlements relating to children allocated to the main carers and elements for disability, unpaid carers and housing dispersed accordingly**

Payments should be split in line with entitlements linked to caring. Elements related to dependent children, or caring for disabled, ill or older relatives should go directly to the main carer. Similarly, if housing benefit is included in the claim, and rent is not paid directly to the landlord, this portion of the entitlement should go to the person named on the tenancy.

- **Mainstream gender in the development of new legislation, policies and programmes**

Scottish Government is required by the public sector equality duty to ensure that gender equality is mainstreamed in the development of all legislation, policy and programmes. This means that the advancement of gender equality must be identified as a key objective of social security policy and embedded as such. Gender equality, and equality more broadly, should therefore be central to social security design and delivery.

- **Ensure that regulations for specific entitlements are robustly gender impact assessed, and that their cumulative impact on women's equality is also impact assessed.**

Ensuring that robust, high-quality Equality Impact Assessments (EqIA) are an integral part of the policymaking process is important. Engender had previously noted that the EqIA for the Social Security Bill highlighted that “equality and non-discrimination should be included on the face of the bill”.⁴¹

⁴¹ Engender (2016) *Securing Women's Futures: Using Scotland's New Social Security Powers to Close the Gender Equality Gap* available at <https://www.engender.org.uk/content/publications/Securing-Womens->

The EqIA failed to consider how policies might impact particular groups, referenced women in broad strokes, did not investigate how proposals would impact women specifically and did not adopt an intersectional approach.⁴² Throughout this process of EqIAs, we urge caution in the assumption that women will benefit from the policy because they comprise the majority of recipients.

- **Design employability programmes that address occupational segregation and have gender equality as a central aim.**

Scottish Government can work to actively disrupt occupational segregation through Fair Start Scotland. Occupational segregation is one of the main causes of the gender pay gap and contributes to women's in-work poverty as segregation means women are concentrated in undervalued, low-paid jobs. Generic skills and employability programmes are likely to replicate these gendered patterns of skills acquisition and employment – further trapping women into low pay and in-work poverty.

Gender equality must be a stated central aim of Fair Start Scotland and providers within the programme should be required to identify and report on how they will mitigate the causes of occupational segregation throughout design and delivery. This also means that Fair Start Scotland should not be focused on 'any job' but there should be a consideration of a woman's skill level and whether a job satisfies her flexibility requirements.

- **Invest in targeted employment support services for women, including for carers, disabled women, refugees, lone parents and women experiencing domestic abuse**

Employability programmes need to take account of women's different experiences across education and skills, caring responsibilities and the type of work they are able to access, and purposefully respond to them. Diverse groups of women also have specific support needs and, consequently, a one-size-fits-all approach to employability programmes is insufficient. For example, refugee women are disadvantaged by current employment support provision which does not take account of their particular needs and experiences.

[Futures---using-Scotlands-new-social-security-powers-to-close-the-gender-equality-gap.pdf](#) Accessed August 2018

⁴² Ibid

Targeted employability programmes should also focus on the needs of women who have experienced domestic abuse. The initial findings⁴³ of the *Building Equality*⁴⁴ employability programme for women who have experienced domestic abuse supports a holistic approach that meets women's needs for childcare, gender-sensitive employability work that takes cognisance of occupational segregation and labour-market discrimination, advocacy, and a theoretical understanding of employment journeys that is more of a spiral than the currently dominant pipeline.

Learning from the experience of Building Equality, considering the needs of diverse women and gendering employability programmes will help women to gain work, progress in employment and achieve financial independence.

- **Review the impact of Fair Start Scotland on women's equality and ensure that they are joined-up with new social security programmes**

A central part of the monitoring and evaluation of Fair Start Scotland should be an assessment of whether the devolved programmes are having a positive impact on women's equality. As mentioned above, this should include analysing whether employers are actively challenging occupational segregation and could also include an assessment of whether job-seeking support is sufficiently tailored to the needs of women.

Unpaid work

- **Create a living wage for carers to which all carers in employment and education, and carers for all ages are entitled**

We welcome the Scottish Government's commitment to equalise Carer's Allowance with Jobseeker's Allowance from 2018. However, even at this increased rate, Carers Allowance will represent only £2 per hour⁴⁵ for a minimum of 35 hours per week. This low rate of Carer's Allowance, as well as living in households affected by disability, is reflected in recent research by Carers UK which shows that nearly 40% of carer households are managing on a gross monthly income of £1000 or less. Considering that unpaid carers

⁴³ Scottish Women's Aid (forthcoming) *Building Equality interim report*

⁴⁴ Building Equality is Scottish Women's Aid project developed jointly with Close the Gap and Engender in which women's aid groups test models of employability programmes for women who have experienced domestic abuse.

⁴⁵ Carers UK (2016) State of Caring 2016 available at <https://www.carersuk.org/for-professionals/policy/policy-library/state-of-caring-2016> Accessed August 2018

undertake work worth an estimated £10.8 billion to Scotland's economy, it seems reasonable to expect that carers should receive a living wage.

Many women carers would welcome the ability to undertake more and better paid work, as it would increase their independent income, self-esteem and social life, and enable them to maintain or develop skills in the workplace ahead of the possible need to return to work after their 'carer journey'. Being able to work increased hours while caring would assist in lifting unpaid carers out of in-work poverty. Restricted access to education for carers under the current system also undermines women's equality of opportunity and future earning potential. We echo Engender's recommendations listed in the Gender Matters Roadmap and call for a Scottish Carers Living Wage Strategy to introduce a Scottish Carer's Living Wage accessible by all carer's, abolishment of restrictions on education and employment for the Scottish Carer's benefit.⁴⁶

- **Top-up child benefit by £5 per week**

By 2020, women who are lone parents will experience an estimated loss of £4,000 per year, a 20% drop in living standards and a 17% drop in disposable income.⁴⁷ Where women's disposable income is reduced, spending on children decreases and links between women's and child poverty are widely recognised.⁴⁸ The Scottish Government have put significant focus on child poverty, noting that child poverty shapes life chances, development and wellbeing, and subjects children to extreme stigmatisation.

These detrimental impacts could be mitigated by the Scottish Government by 'topping-up' child benefit by a £5 per week and by widening access to the new Best Start Grant (BSG).⁴⁹

⁴⁶ Engender (2017) *Gender Matters Roadmap: Towards Women's Equality in Scotland* available at <https://gendermatters.engender.org.uk/content/social-security/> Accessed August 2018

⁴⁷ Women's Budget Group (2016) *A cumulative impact assessment of ten years of austerity policies* available at https://wbg.org.uk/wp-content/uploads/2016/03/De_HenauReed_WBG_GIAtaxben_briefing_2016_03_06.pdf Accessed August 2018

⁴⁸ Women's Budget Group (2005) *Women's and Children's Poverty: Making the Links* available at [http://www.eif.gov.cy/mlsi/dl/genderequality.nsf/0/12D2A22FAC60DA74C22579A6002D950A/\\$file/wbg_womens_and_childrens_poverty.pdf](http://www.eif.gov.cy/mlsi/dl/genderequality.nsf/0/12D2A22FAC60DA74C22579A6002D950A/$file/wbg_womens_and_childrens_poverty.pdf) Accessed August 2018

⁴⁹ Engender (2017) *Gender Matters Roadmap: Towards Women's Equality in Scotland* available at <https://gendermatters.engender.org.uk/content/social-security/> Accessed August 2018

Multiple Discrimination and Intersectionality

- **Ensure that monitoring and evaluation systems gather intersectional gender-disaggregated data**

BME women, disabled women and migrant and refugee women are most likely to be impacted by social security policy and are also more likely to experience poverty. However, much of the pre-existing research into Universal credit does not take a gendered approach and data for groups protected under the Equality Act 2010 is extremely limited at the Scottish-level. This lack of disaggregated data at Scottish-level creates challenges in understanding the impact that Universal credit has on different groups of women's lives and does not allow for responsive, evidence-based policy making.

Monitoring and evaluation should also work to ensure that social security policy and delivery takes account of the particular experiences and rights of refugee and asylum-seeking women living in Scotland.

- **Include actions that will address the undervaluation of “women's work” in the gender pay gap action plan.**

One of the ambitions of universal credit is to incentivise claimants to 'graduate' from it by increasing their earnings. However, there are clear structural factors which can prevent including rising childcare costs, persistent occupational segregation which concentrates women in low paid stereotypically female work, and a lack of quality part-time work can mean that women often have to work in jobs that do not enable them to earn an adequate income.

Close the Gap has welcomed the establishment of the Ministerial working group on the gender pay gap, and Scottish Government's commitment to develop an action plan. To address the root cause of women's in-work poverty, the action plan must however include actions to address the undervaluation of women's work, a key contributing factor in women's and children's poverty.