



Advice NI response to

21st Century Welfare

September 2010

Background

Advice NI is a membership organisation that exists to provide leadership, representation and support for independent advice organisations to facilitate the delivery of high quality, sustainable advice services. Advice NI exists to provide its members with the capacity and tools to ensure effective advice services delivery. This includes: advice and information management systems, funding and planning, quality assurance support, NVQs in advice and guidance, social policy co-ordination and ICT development.

Membership of Advice NI is normally for organisations that provide significant advice and information services to the public. Advice NI has over 70 member organisations operating throughout Northern Ireland and providing information and advocacy services to over 100,000 people each year dealing with over 227,000 enquiries on an extensive range of matters including: social security, housing, debt, consumer and employment issues. For further information, please visit www.adviceni.net.

General

Advice NI notes the quote from Iain Duncan Smith in the Foreword of the consultation document '21st Century Welfare': '*The only way to make a sustainable difference is by tackling the root causes of poverty: family breakdown; educational failure; drug and alcohol addiction; severe personal indebtedness; and economic dependency.*' A fundamental root

cause of poverty has been omitted from this list namely disability, where sick and disabled people are unable to access employment and so ‘make work pay’. Advice NI firmly believes that if the issue of disability is not considered to be a root cause of poverty, then any discussion on reform of the benefits systems will be incomplete, and any outworkings will be doomed to fail people with disabilities.

Another fundamental factor in the equation of ‘welfare to work’ is the availability of employment opportunities. In terms of timing, Advice NI notes a recent forecast which estimates that at least one in 10 people will be unemployed in half of UK regions by 2015, according to the Centre for Economics and Business Research (CEBR). Even the most optimistic of forecasts question the strength of the economic recovery over the short to medium term. This would tend to cast doubt on the ability of any reformed system to support people to make the move into employment, if there are no employment opportunities available.

Advice NI would repeat our fears as regards the issue of ‘floundering families’. This concept first surfaced in the United States where people (in particular single parent households) were seen to fall through (be intentionally excluded from) the welfare system and became reliant on charitable handouts in order to survive. We are already seeing evidence of this happening in relation to people with health problems being refused Employment and Support Allowance (the majority of ESA claimants are refused). When claimants are refused ESA the only alternative is to claim Job Seekers Allowance. This benefit is simply not designed for persons with significant health problems. In consequence, if claimants are honest about what they can and cannot do, they are likely to be excluded from JSA beyond which there is no support of any kind. We would be concerned that cracks in the system will widen with reported proposals to withdraw welfare benefits from some claimants on a temporary or perhaps permanent basis.

Advice NI notes with concern that the government is planning to reduce the welfare bill by a further £4bn, on top of an £11bn cut made in June. The combined £4bn and £11bn cuts represent about 6% of total spending on welfare. It is our view that the proposed cuts to welfare represent an attack on the poorest families as in our experience people claim benefits because they rely on this support to survive.

Given that we are talking about the most vulnerable people in society, acknowledged as being the ‘hardest to help’, Government should ensure that there are adequate safeguards in place to protect and support not further marginalise and demonise. The system must play its part in ensuring that people have sufficient income to put food on the table and keep a roof over their head.

In previous welfare reform consultations, Advice NI has highlighted that “forced integration into the labour market will not work” without the associated significant increases in spending on areas such as childcare and ‘making work pay’. Government should not shirk its responsibilities in this regard and Advice NI believes that sufficient resources will have to be made available if welfare reform is to have any meaningful positive impact. A firm focus should be on helping those who move from welfare to work to retain their jobs over the longer term and supporting the hardest to help benefit recipients who may be left behind by welfare reform, as the labour market is swelled by students and those recently made redundant who may be felt to be more ‘job ready’.

Question 1 What steps should the Government consider to reduce the cost of the welfare system and reduce welfare dependency and poverty?

In terms of the welfare system and welfare reform, Advice NI is involved in systems thinking work and a fundamental concept within systems thinking is to understand that cost reduction should not be the driver; but it is a by-product if the methodology is fully applied. In particular ‘economies of flow’ focuses on understanding what people want and need from the service; with expertise then deployed at the point of transaction; getting the work done faster and more efficiently. Service improvement, ‘economies of flow’ rather than ‘economies of scale’

and the eradication of waste and ‘failure demand’ are all drivers which ultimately can transform welfare services; boost staff morale and maximise returns on investment.

Therefore in answer to the question, in terms of service delivery, Advice NI would advocate that the systems thinking methodology be rigorously applied to the welfare system – as delivered through the various Government Departments.

In terms of those people who rely on welfare, Advice NI would make the following points:

- There must be an effective environment to support people move from welfare to work. This environment will include the financial aspect; but should also include childcare; up skilling and health (adequately assisting people with health related issues).
- Moving from benefits to employment is often considered a risk because finances are so tight; effective advice services must be in place to assure claimants that (1) they will be better-off; and (2) ensure that in-work benefits are put in place swiftly and accurately.
- Greater conditionality may create resistance from claimants and support groups; greater conditionality in the form of sanctions may cause hardship and may also force people to accept jobs that are not right for them, ultimately leading to a return to benefit.
- There is an argument for re-balancing conditionality during the current economic down-turn so as to prevent nugatory work for officials in terms of administering conditionality regimes which will have little or no prospect of assisting people to move from welfare to work.
- A head-count or tailored support: if the ‘one size fits all’ goal is moving people from welfare to employment, Advice NI believes that this will fatally undermine what Government is trying to achieve. Tailored support would involve recognising that

everyone on welfare will have a journey to make in order to move into employment and they must be supported on this journey.

- Advice NI would particularly draw attention to the journey that many people with health issues will have to make before being work-ready. We would like to see a continued focus on different elements of this journey including volunteering; education and training; part-time work. Advice NI will continue to advocate on behalf of those people for whom the transition from benefits to work may not be a straightforward process.

Question 2 Which aspects of the current benefits and Tax Credits system in particular lead to the widely held view that work does not pay for benefit recipients?

Advice NI believes that historically the rate at which earnings begin to be taken into account for means-tested benefit purposes has been too low. For Income Support, Income Based JSA and Housing Benefit the three levels of disregard are £25, £20 and £10 and these figures have remained largely unchanged since 1988. These rates provide no real incentive to help people move into employment and indeed mitigate against such a move as benefit levels will drop sharply given the low earnings disregard threshold, the sharp taper that is applied thereafter and the cumulative impact of earnings across all benefits that may be in payment.

Question 3 To what extent is the complexity of the system deterring some people from moving into work?

Advice NI believes that this is a real issue for people on benefits. As highlighted previously, welfare recipients can often be ‘hard to help’ in terms of their ill health (physical and mental), educational status, housing status, employment readiness, language barriers, income and so on. These same people are the least able to take risks to work. Some examples of where the system can be difficult to navigate include:

- Linking rules are very important for people who attempt employment but suffer a relapse. Linking rules should apply to all benefits which were in payment prior to taking up the employment opportunity, in particular Housing Benefit and Disability Living Allowance;
- There could be a system of much improved ‘run-on’ support (from benefits into work) to incentivise and reduce any perceived risk of moving into paid employment;
- In addition to benefit simplification, the issue of bureaucracy needs to be addressed to ensure that linking and run-on systems are streamlined, fast and effective;
- Government have much to do to reconcile the points of view that (1) supporting people with health problems into work is the answer to their health problems in particular where these same people have been assessed as medically incapable of work by both their GP and a doctor of the Department; or (2) where people have failed medical assessments it does not mean that they do not have significant, work-limiting conditions which affect their ability to work. Advice NI does not believe that the issue of work-limiting health conditions has received sufficient attention within the reform proposals;
- There remains doubt that adequate support is / will be in place, particularly for people to manage health related conditions. This point relates to the need for joined up services to be in place across the benefits, employment and health sectors – and ideally with independent advice and information also available to enable benefit recipients to make informed choices about moving from benefits to work;
- Increased responsibility and potentially benefit sanctions will effectively penalise those who are already accepted as being the most vulnerable in our society. Sanctions must be a tool of last resort. There must be adequate safeguards in place to protect and encourage rather than penalise;

Additionally the system is so complex to administer that welfare recipients may have experiences of staff providing incorrect information, making incorrect decisions or lengthy delays in receiving a decision. This suspicion or lack of certainty can contribute to welfare recipients deciding to take the ‘safe’ option of remaining on benefits rather than taking the ‘risk’ to take up an employment opportunity.

Question 4 To what extent is structural reform needed to deliver customer service improvements, drive down administration costs and cut the levels of error, overpayments and fraud?

Advice NI would refer to the points made above, and would particularly advocate the systems thinking approach which would appear to ‘fit’ with the vision outlined in the consultation document.

Question 5 Has the Government identified the right set of principles to use to guide reform?

Advice NI would urge that the following principles be added:

- Safeguards will be in place to ensure that people will not ‘fall through the cracks’ and left with little or no income as a result of welfare reform;
- People will very often have a journey to make from welfare to work: reform will be committed to providing tailored support to people to enable them to make this journey;
- Welfare reform is sensitive to the needs of people with disabilities, who have work-limiting conditions;
- There must be an holistic approach to effectively support people move from welfare to work. This approach will include the financial aspect; but should also include childcare; up skilling (including education and training) and health (adequately assisting people with health related issues).

Question 6 Would an approach along the lines of the models set out in chapter 3 improve work incentives and hence help the Government to reduce costs and tackle welfare dependency and poverty? Which elements would be most successful? What other approaches should the Government consider?

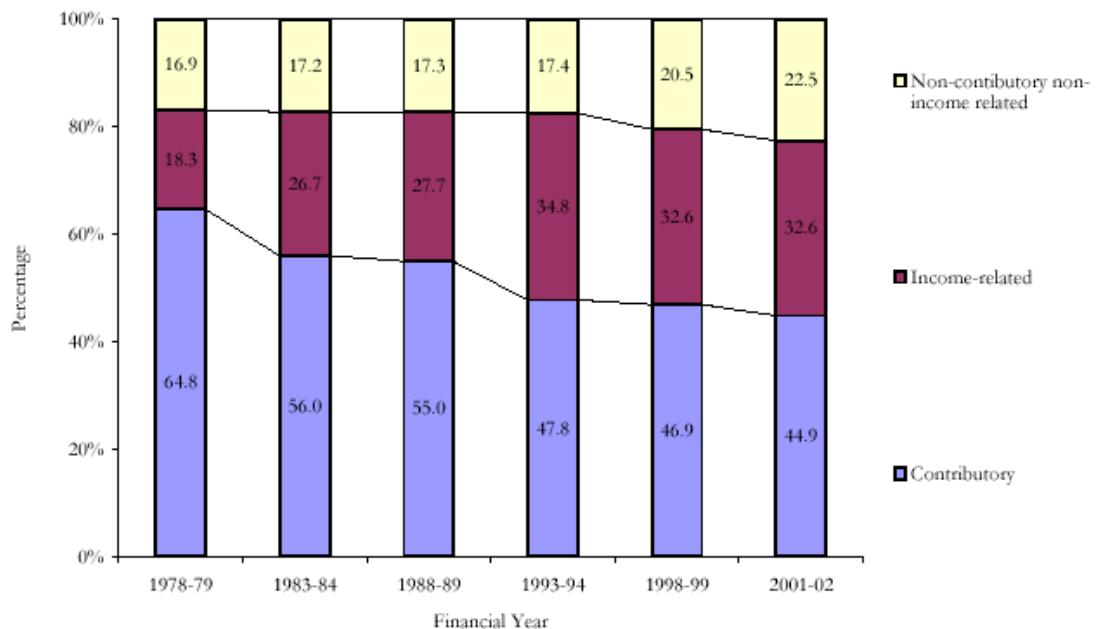
Advice NI does not have the necessary information to hand to make an assessment concerning the alternative models. However we would make the following points:

National Insurance and the contributory principle: Many people imagine that their National Insurance contributions are payments which enable an individual to qualify for certain types of social security benefits, for example Retirement Pension, contribution-based Job Seekers Allowance and Employment & Support Allowance / Incapacity Benefit. The principle of contribution is viewed as paying your way, and if/when the time comes to access contribution-based social security benefits in times of unemployment or sickness, it is expected that these benefits will be paid.

However, we can see that the national insurance pool is being used for purposes other than contribution based benefits. We also see the qualifying criteria for contributory benefits are tightening with a view to restricting expenditure. And we see the national insurance pool itself moving towards convergence with income tax, with a break in the direct link between contributions paid and accessibility to contributory benefits.

Please see chart below:

**Relative importance of spending on contributory,
income-related and other benefits, 1978-79 to 2001-02**



Source: DWP and the Institute for Fiscal Studies

Successive governments' policy has been to construct a social security system based ever-more clearly around 'need' rather than past National Insurance contributions. This was taken on by the Labour Government, and to quote Alastair Darling: "the important difference in social security is not whether [benefits] are insurance-based or means-tested, but whether or not they provide enough help to get people back to work and improve their lives", and that income-testing was essential to ensure that "state spending ... be concentrated where it is needed most". This consultation paper similarly states: "There would continue to be some non-means-tested support, including contributory entitlements for people who have paid National Insurance contributions, but generally the amount of benefit payable would depend on the level of household income and savings" and the Institute for Public Policy Research have proposed a model for a Single Working Age Benefit which has no contributory entitlement.

Advice NI believes that people do imagine that their National Insurance contributions are something separate from Income Tax and which will ensure some degree of protection and financial security in times of sickness, unemployment or old age. There needs to be a clear strategy for clearly letting people know that this is no longer the case, should the Single Working Age Benefit be adopted. In our view this message will not be well received.

Means testing: The flip-side of breaking the link between benefits and National Insurance contributions is that means testing becomes universal. There are a set of issues which are inextricably linked to means testing including: stigma, feeling of intrusive questioning, inherent complexity of application forms and the process, delays and errors in the decision making process, evidence required from third parties, less than 100% uptake.

HMRC and the Universal Credit: Proposals in the consultation paper appear to focus on a Universal Credit which would be delivered through a new system which would use up-to-date earnings information from employers to calculate Universal Credit on a household basis. This might imply that HMRC will take over the administration of the Universal Credit. Advice NI would have real concerns about the capability of HMRC to administer a system which would be relied upon by all working age people, families and children.

Quoting from an Advice NI report in relation to tax credits:

"It can be all to easy for decision makers to lose sight of the impact that operational and systemic failures have on people's lives. One of the most striking aspects of this eConsultation is the way in which it has brought a very real human dimension to this issue. It has very clearly highlighted that far from providing security and financial stability, tax credits and in particular the recovery regime has produced uncertainty, considerable distress and real hardship for many ... There is no doubt that Government is providing a greater proportion of financial support to families and people on low incomes via HM

Revenue & Customs and the tax system, as opposed to the benefits system. However, the Revenue has much to do to convince people that they can deal effectively with this client group and that they have the necessary systems in place to deliver this support. The evidence so far would suggest that the Revenue, as a service provider, is actually failing many people who (a) are entitled to this support and (b) rely on this support to make ends meet.”

Currently the benefits systems as administered by the Social Security Agency in Northern Ireland very often helps people survive while HMRC (whether through tax credits or child benefit failures) fail to administer payments in a timely and correct manner. There is an inherent risk in centralising welfare in the shape of a Universal Credit within HMRC: the risk being that vulnerable, low income households will be left with nothing when things go wrong.

Question 7 Do you think we should increase the obligations on benefit claimants who can work to take the steps necessary to seek and enter work?

Question 8 Do you think that we should have a system of conditionality which aims to maximise the amount of work a person does, consistent with their personal circumstances?

Advice NI is very concerned about the extent of the focus on enhanced conditionality for welfare recipients. The result of increased conditionality for many vulnerable people will be sanctions (reduced amount of already minimal rate of benefit) or more disturbingly lose of benefit either temporarily or permanently. Advice NI has already raised the issue of ‘floundering families’ and can only see such a situation becoming more prevalent in the UK; households denied welfare, reliant upon charitable handouts, falling through ever-widening cracks in the welfare system.

It is perhaps easy to enhance conditionality and obligations expected of claimants; it is however less palatable to preside over a welfare system which denies people access to help. Advice NI has already given a scenario which illustrates what is already happening:

People with health problems being refused Employment and Support Allowance (the majority of ESA claimants are refused). When claimants are refused ESA the only alternative is to claim Job Seekers Allowance. This benefit is simply not designed for persons with significant health problems. In consequence, if claimants are honest about what they can and cannot do, they are likely to be excluded from JSA beyond which there is no support of any kind.

Advice NI advisers have already dealt with a number of clients who have been denied access to both ESA and JSA; with decision makers from each section simply referring claimants to the other. In our view this is an example of a system which is failing claimants by denying access to support.

Advice NI is equally concerned about the issue of sanctions.

- Any loss of benefit provisions / sanctions have the potential to be draconian and may very well result in hardship in many cases. This approach requires careful consideration given the particularly vulnerable nature of this client group;
- Increased responsibility and potentially benefit sanctions will effectively penalise those who are already accepted as being the most vulnerable in our society. Sanctions must be a tool of last resort. There must be adequate safeguards in place to protect and encourage rather than penalise;
- People and in particular families cannot be left to simply fall foul of potentially multiple long term sanctions which effectively reduce the income of those already living on minimal incomes. People and families must not be allowed to 'fall through the cracks' and allowed to 'flounder' as appears to be the case where similar approaches have been taken in the United States;

- If sanctions are meant to change a claimant's behaviour, claimants must clearly know why they are being sanctioned and must clearly be informed as to what steps they need to take to have the sanction removed. There must be a clear, claimant-focussed approach to loss of benefit provisions otherwise this approach will be seen as victimising the vulnerable rather than trying to support and assist;
- Benefits sanctions, for example regarding a failure to carry out a job seeker's direction, will impact upon the whole family (including any children in the household) and there needs to be a balance between encouraging people to move into employment and ensuring that these same people (and in particular their children) are adequately supported while on benefit.
- Increased conditionality will inevitably cause increased administration costs: to impose sanctions and then to remove sanctions when claimants strive to meet the conditions. Where people have been refused ESA, but have significant work-limiting health conditions, Advice NI believes that the JSA decision making regime may become bogged down in imposing harsh conditions and sanctions upon people who require support rather than sanctions.

We would also repeat the point about nugatory activity in the present economic climate. Increased conditionality will increase pressure on claimants and the workload on administration staff and decision makers. At a time when there are few employment opportunities (with the situation expected to deteriorate in Northern Ireland), this will involve activity for the sake of activity and does not appear to be a sensible, value-for-money approach.

Question 9 If you agree that there should be greater localism what local flexibility would be required to deliver this?

Advice NI systems thinking work has focussed on the issue of 'economies of scale' and we have argued in favour of 'economies of flow', as set out below.

During the last 90 years managers in manufacturing organisations have been encouraged to think that combining functions and sharing services will release economies of scale. This economy of scale idea originated with the work of Fredrick Winslow Taylor who wrote his seminal work, the Scientific Method. This built on the work of Adam Smith and his An Inquiry into the Nature and Causes of the Wealth of Nations (1776). Both the above texts advocated that work in manufacturing industries should be broken down into small repeatable tasks that reduce the level of worker skill required to perform a task. The consequence of this is that low cost labour could be used to produce manufactured goods. This is the paradigm most often associated with the mass production of motor vehicles by Henry Ford in the USA.

Adam Smith's thinking is still used today to support the theory of Economy of Scale. Economy of scale aims at achieving mass production with least input expenses, both in terms of labour and financial investments. As bulk production increases, all related investments reduce proportionately, leading to substantial financial savings on the part of the company. The twin policies of specialisation in industrial fields and division of labour facilitate acquisition of maximum returns from minimum investments. It also leads to 'dumbing down,' fragmenting or deskilling of work.

This industrialised thinking has been progressively forced into service type organisations in the UK public sector by bodies such as the Audit Commission and Department for Communities and Local Government. One of the most obvious manifestations of this is the recent obsession in the public sector with having front office / back office splits in work. Building centralised work processing 'factories' that claim to be 'best practice'.

The concept of the 'back office' was first developed by Chase in 1978¹. His argument was that de-coupling the customer from the service would enable managers to optimise the use

¹ Chase, R.B. 1978, 'Where does the customer fit in a service operation?' Harvard Business Review, Vol. 56.

of resources (i.e. people), that is to say, get more work out of them. Back-office work is typically specialised (cutting training costs) and standardised (also assumed to cut costs). But any gain is more than wiped out by disastrously self-reinforcing system effects: since the system is now prevented from absorbing variety, demand (in the shape of failure demand) soars, and managers, not recognising the cause, try to solve the problem with the same thinking that created the problem in the first place; further specialisation, greater use of technology to drive down activity times, outsourcing to low-cost providers. The environment becomes a sweatshop and people's ingenuity is entirely taken up with survival.

Alternatively, managing value requires, first of all, thorough knowledge about citizen demands. Understanding demand in citizens' terms (what do they want and need from the service) leads to knowledge about the expertise required to service those demands. Deploying that expertise at the point of transaction gets the work done faster and more efficiently. This is real efficiency saving: better services with lower costs. By focusing on providing what customers want costs are driven out; cost-reduction is a consequence, not a focus for management.

The following example of Stroud District Council highlights what can happen where people working in the benefits office see their job as helping people solve their problems, not just administering benefits – a perspective it would be impossible to take in a fragmented scale design. In the Stroud design staff morale rises and the symptoms of poor morale – sickness and absence – fall.

Stroud District Council Case study (March 2010):

The following case study illustrates the improvements that can be achieved using a systems thinking approach:

The starting point to discovering waste, according to Anne McKenzie, Head of Revenues and Benefits at Stroud District Council, is to define your purpose from the customer's point of view.

Her team's new purpose is 'to pay the right amount of housing benefit to the right person at the right time'. Once the team had defined its purpose, they worked out how much of what they did contributed directly to achieving this purpose and how much didn't.

They did this by analysing all calls, visits and emails into their service over a period of time. To everyone's surprise, 90 per cent of all customer demands were not contributing to the purpose and were, therefore, waste.

Ms McKenzie says: 'Much of this waste was due to customers' progress-chasing their claims, telling us they did not understand the letters we'd sent them and - by far the most frequent – incomplete claim forms. None of this was the customer's fault. We knew it was our responsibility to change the system.'

Waste

In the old system, the front and back office were split, with generic customer service staff responding to customers at reception points and answering calls. The split meant that dependency on the IT system that transferred work from the front to the back office (the DIP) was high.

Ms McKenzie says: 'We didn't realise how slavishly we worked for the DIP system, rather than using it to work for us.'

A result of the front/back office split was that assessors had very little face to face contact with customers.

In the new system, there is no front/back office split. Customers are now seen by a benefits assessor or other trained member of staff when they first come in, with the option of a home visit and help with getting documents to the office if they need it. Customers develop a personal relationship with the assessors, visiting the same assessor again if they need to tell the office about a change in their circumstances.

In the old system, claims often took 40 to 42 days to process. In the new system, most claims are completed within a week, even with the additional workload caused by the economic downturn. Twenty per cent of claims are now completed within two days.

Benefits

Customers love the new way of working and the team often receive letters of thanks and even flowers. Complaints are rare. Waste is also rare; phone calls from customers chasing the progress of claims have almost disappeared because people know that an assessor is personally handling their claim, which gives them confidence in the process. One customer wrote:

'I've always had a fear of any kind of authority and found it a bit daunting to go down to the council offices. To my surprise, I found you approachable, helpful and considerate. I feel I owe you thanks for the way you helped me.'

Staff now see their role as 'helping people to claim benefits'. This is profoundly different to their previous role which was 'to assess benefits'. Sickness in the team has reduced by 44 per cent. Staff enjoy the personal contact with customers and feel a real sense of accomplishment when resolving benefit claims quickly and efficiently.

Ms McKenzie's advice to other housing benefits teams is that a low cost, low risk start to improvement can be made by analysing why customers contact a service.

She says: 'Understanding demand provides data on how much waste there is. This can be a very powerful lever for change.' But she warns that this, on its own, is not enough, 'if you want to change the results, you have to change the system. And to change the system, you have to change how you think'.

Question 10 The Government is committed to delivering more affordable homes. How could reform best be implemented to ensure providers can continue to deliver the new homes we need and maintain the existing affordable homes?

Advice NI was commissioned to conduct research into affordable housing in Northern Ireland. One of the aims of the project was to deepen understanding of the extent, distribution and causes of housing inequality and how this contributes to wider social exclusion².

As might have been expected, the various threads of the research highlighted widespread interest in the operation of the housing market with much anecdotal evidence that house prices and consequent affordability was an issue affecting people from all walks of life in Northern Ireland. The research attempted to reflect people's actual experiences and uncover how restricted access to housing across tenures impacts on the opportunities available to people. The qualitative nature of the research was intended to augment joint research from the University of Glasgow and the University of Ulster into the operation of the housing market in Northern Ireland which was commissioned by the Housing Executive to complement and support the work of the independent Review into Affordable Housing led by Sir John Semple.

In particular the research undertaken by Advice NI supplemented the Review into Affordable Housing by providing a focus on:

- Homelessness: How affordability factors that deprive people of the opportunity to access any type of housing tenure, and in particular the experience of young single people;
- Social Housing: General issues around people's ability to access social housing for rent and in particular considering the impact of the Right to Buy scheme on access to housing now and in the future ;
- Private Rented: Particularly the shortfall between private rented sector Housing Benefit and contractual rent, with other issues including the need for regulation of

² http://www.ds dni.gov.uk/adviceni_afford_exec_sum_03-07.pdf

the private rented sector and measures to make entry into the private rented sector more affordable;

- Home Ownership: Issues related to speculation and purchase of traditional family homes for development and their impact on house prices being the single most prominent point for discussion.

The research identified other themes and differential impacts experienced by various client groups which have direct relevance to formulation of policy that responds to the restricted access to housing. Rural contributors were concerned about the impact of the restricted access to affordable housing on rural communities; the need for advice and support for people in debt due to housing costs; lone parents prevented from accessing employment due to the lack of private rented accommodation; and specific issues in relation to people from abroad, older people, prisoners, students and people on benefits or low waged incomes. The Research Report identifies a number of recommendations which would contribute towards answering this question.

Advice NI would also take this opportunity to raise concerns about the following: (1) from 1 October 2010, the *Social Security (Housing Costs) (Standard Interest Rate) Amendment Regulations 2010* (SI.No.1811/2010) propose to replace the current fixed standard interest rate of 6.08% with a rate based on the average interest rate for loans to households secured on dwellings published by the Bank of England – currently 3.63%. DWP impact assessments show that approximately half of all benefit claimants will see their help with mortgage interest reduced, effectively their benefit is being cut and they will have to find the shortfall out of their benefit payments. Ultimately we see increased indebtedness and homelessness as a result of this policy. (2) *Housing Benefit (Amendment) Regulations 2010*, and associated amendments to the *Rent Officers (Housing Benefit Functions Order) 2010* propose to introduce restrictions to Housing Benefit / Local Housing Allowance including a new upper limit per property type. Again a DWP impact assessment on the proposed changes show that an estimated 99% of local housing allowance cases will be affected, with an average decrease in benefit of £12 per week. Again this amount to a cut in benefit and can only lead to increased indebtedness and homelessness.

Question 11What would be the best way to organise delivery of a reformed system to achieve improvements in outcomes, customer service and efficiency?

In answer to this question, Advice NI would simply suggest that welfare reform should not be driven by technology – the issue is far too important and the IT systems too inefficient and ineffective. Probably the most common response to claimants and advisers is: '*the system does not allow us to ...*'. Advice NI systems thinking work has touched upon the issue of technology and we would be happy to provide further information on this issue as required.

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