



Response to Child Maintenance: Improving the collection and transfer of payments consultation

About Parenting across Scotland

Parenting across Scotland is a network of charities working together to realise a Scotland where all parents and families are valued and supported to give children the best possible start in life.

As a member of the Transforming Child Maintenance Project Advisory Group (led by One Parent Families Scotland, Fife Gingerbread and IPPR Scotland), we welcome the opportunity to respond to this consultation on the Child Maintenance Service. Our response draws on the relevant findings from our 2024 Parenting Evidence Review, which brings together evidence from 28 parenting research reports published in Scotland in 2023, involving over 4000 parents and carers¹. This includes the Poverty Alliance and Fife Gingerbread's research on child maintenance during the cost-of-living crisis². We also draw on our member One Parent Families Scotland's work in this area³ and early evidence from the Transforming Child Maintenance Project⁴. Our response to this consultation will focus on those questions where we have direct evidence from these sources.

Questions

Question 16: What are your views on the current fee rates for receiving and paying parents in Collect and Pay?

We commend the previous government's decision earlier in 2024 to remove the £20 application fee to parents accessing the Child Maintenance System. This change removes

¹ Parenting across Scotland (2024) Parenting Evidence Review, [pas-literature-review_final.pdf \(parentingacrossscotland.org\)](#)

² McHardy, F. and Robertson, L. (2023) 'Child Maintenance during a Cost-of-Living crisis. A System of Support?'

³ One Parent Families Scotland (2023) Child Support Collection (Domestic Abuse) Bill Briefing

⁴ One Parent Families Scotland (2024) Transforming Child Maintenance, <https://opfs.org.uk/policy-and-campaigns/policy-research/transforming-child-maintenance/>

one barrier to accessing support. However, evidence suggests that the current fee rates are still too high, particularly for receiving parents. These fees create additional issues for some accessing the money they are entitled to, particularly victims or survivors of domestic abuse which will be covered in our response to question 30.

For many families, especially those on low incomes, Child Maintenance is a vital source of income, and parents depend on receiving money to help support their child(ren). With approximately 30% of children across the UK living in households experiencing poverty⁵, a 4% fee for receiving families through Collect and Pay is far too high a cost.

Parents are already facing dilemmas such as “...being forced to choose between feeding their children or paying the rent”⁶. It is vital the government scrap fees to reduce the impact that Child Maintenance System (CMS) has on poverty and to ensure a human rights-based approach where parents are given as much support as possible.

There is well established evidence which shows that women are more likely to be impacted by poverty than men⁷. As women are more likely to be the resident parent, every step must be taken to ensure that the CMS does not further contribute to gender inequality through its fee system⁸.

As highlighted in the report by The Poverty Alliance and Fife Gingerbread, there is an opportunity and requirement for gender inequality and wider issues of child poverty to be addressed in this review of the CMS⁹. With some further development, particularly in the reduction of fees for receiving parents, child maintenance payments could help reduce inequalities. The removal of fees would be a strong start.

Question 17: Are you in favour of a 2% fee for receiving parents and a 2% fee for compliant paying parents under a scheme where the CMS monitors and transfers all maintenance payments?

No

Question 18: Please could you explain your answer?

We believe that the removal of fees altogether would be more beneficial to parents, particularly those most in need, and also to support gender inequality, reduce the impact

⁵ End Child Poverty (2024) Child Poverty Statistics 2024, <https://endchildpoverty.org.uk/child-poverty-2024/>

⁶ Ipsos and the Trussell Trust (2023) Hunger in Scotland Report.

⁷ McHardy, F. and Robertson, L. (2023) ‘Child Maintenance during a Cost-of-Living crisis. A System of Support?’

⁸ National Audit Office (2022) Child Maintenance Report

⁹ McHardy, F. and Robertson, L. (2023) ‘Child Maintenance during a Cost-of-Living crisis. A System of Support?’

of poverty and support those who are victims and survivors of domestic abuse which will be discussed in later responses.

Question 28: Do you agree removing Direct Pay completely would benefit victims and survivors of domestic abuse who use the CMS?

Yes

Question 29: Please could you explain your answer?

The removal of Direct Pay completely would benefit victims and survivors of domestic abuse using CMS; however, this must go hand in hand with the strengthening of support services and a review of the fees for Collect and Pay.

Firstly, through Parenting across Scotland's Parental Evidence Review, we know that some parents avoid the CMS altogether to avoid contact and stop continued abuse from the other parent¹⁰. Removal of Direct Pay has the potential to ensure an extra layer of protection for the receiving parent – as long as the CMS structure is reconsidered in terms of fees and there is more enforcement in place to ensure payments are made on time to avoid any further economic abuse.

If Direct Pay is to be removed, then it is vital that the fee structure of Collect and Pay is thought through to ensure that those who have experienced domestic abuse are not put at additional risk. Single mothers supported by One Parent Families Scotland¹¹ shared their experiences of intimidation from former partners in relation to requesting Collect and Pay, due to the 20% charge. Some parents said that in cases where payments were not being made or made in full, they did not seek to change the set up to Collect and Pay due to fear of their former partner's reaction.

Removal of charges altogether would help resolve this situation. As stated by One Parent Families Scotland, 'given the high proportion of CMS cases involving domestic abuse, the nature of coercive control leading to underreporting, and potential complications arising from a two-tiered system, removing charges for Collect and Pay altogether can be seen as justifiable to achieve the intended purpose of better supporting survivors of domestic abuse'¹².

By removing Direct Pay, it would be easier for victims and survivors of domestic abuse to access the financial support they are entitled to. However, as will be discussed in the next

¹⁰ Parenting across Scotland (2024) Parenting Evidence Review.

¹¹ One Parent Families Scotland (2023) Child Support Collection (Domestic Abuse) Bill Briefing

¹² One Parent Families Scotland (2023) Child Support Collection (Domestic Abuse) Bill Briefing

question response, this needs to be paired with the correct approach across the whole service.

Question 30: Assuming the CMS did manage the collection and transfer of all maintenance payments, what further support would you like to see the CMS offer to victims and survivors of domestic abuse?

We strongly welcome **ALL** CMS staff receiving mandatory domestic abuse support training and working closely with officials in the Home Office to review updated statutory guidance on coercive and controlling behaviour. This will help ensure CMS staff are equipped to recognise all forms of domestic abuse and can signpost parents appropriately. It is essential that training is reviewed regularly, and staff complete it annually.

Although useful to all users of CMS, the removal of the application fee for all users is also of benefit to those who experienced domestic abuse as it removes an instant barrier for those who perhaps do not realise they have been involved in an abusive relationship or who are afraid of disclosing their situation. Overall statistics held by CMS on domestic abuse levels are likely to underrepresent the true figures¹³, so removal of barriers to all helps those who do not feel able to disclose their experiences. It is therefore vital that CMS staff approach all cases with a trauma informed, person-centred approach regardless of whether they know there has been any domestic abuse or coercive behaviour.

More widely, work is required to ensure CMS acts as a safety net for all. “The CMS should be an effective way of preventing economic abuse being another factor to contend with but sadly it often enhances these issues instead” as one parent stated through One Parent Families Scotland.¹⁴ Identified issues around the system must be addressed, and engagement with service users should be undertaken regularly to review the system.

There will also be individuals who avoid CMS due to fear of the affect it could have on relationship dynamics, for example. A person-centred, human rights-based approach will help ensure that all those who could benefit from child maintenance are benefitting. It is vital to ensure that CMS staff treat all service users with dignity and empathy as an individual’s past may never be told but we know from parental evidence that the CMS system so far can be triggering for those who have experienced domestic abuse - “My PTSD is highly triggered when I have to ring the CMS as I have to talk about him, and the financial abuse and control continues. The CMS has no empathy, they talk down to people who are

¹³ One Parent Families Scotland (2023) Child Support Collection (Domestic Abuse) Bill Briefing

¹⁴ One Parent Families Scotland (2024) Transforming child maintenance: Chloe’s story, <https://opfs.org.uk/talk-to-us/single-parent-stories/child-maintenance-chloes-story/>

fighting for justice for their children and quite frankly care more about the “rights” of the non-resident parent than the rights of the children and the resident parents.”¹⁵

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¹⁵ One Parent Families Scotland (2024) Transforming child maintenance: Gemma’s story, <https://opfs.org.uk/talk-to-us/single-parent-stories/transforming-child-maintenance-gemmas-story/>