

Conditional Cash Transfer Programmes in Brazil, Argentina and Scotland: A comparative analysis of their conceptions

Programas de Transferência Condicionada de Renda no Brasil, Argentina e Escócia: uma análise comparada de suas concepções

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DOI: 10.1590/2358-2898202514599781

ABSTRACT This article compares three Conditional Cash Transfer Programmes (CCTPs), the Bolsa Família, the Asignación Universal por Hijo and the Universal Credit in, respectively, Brazil, Argentina, and Scotland from the standpoint of their conceptions and meanings. The objectives, conceptions and arguments that guide beneficiary selection and conditionalities are analysed and compared using the policy analysis methodology and focusing on the political and ideological contexts in which these policies were formulated. In the three countries, CCTPs have become the primary strategy for combating poverty in contexts of fiscal austerity. In Argentina and Brazil, with their historical deficits in access to social rights, the programmes have reduced the worst rates of income poverty and expanded social inclusion through health and education conditionalities, constituting a move to combat inequalities without changing the structural conditions that sustain them. In Scotland, Universal Credit broke with the universalist conception of welfare, of meeting people's basic needs. By retracting social assistance and applying a punitive logic designed to produce behavioural changes among the poorest, it had adverse effects, especially on the most vulnerable in the population.

KEYWORDS Social policy. Social protection. Brazil. Argentina. Scotland.

RESUMO O artigo compara três Programas de Transferência Condicionada de Renda (PTCR): Programa Bolsa Família, Asignación Universal por Hijo e Universal Credit, respectivamente, no Brasil, na Argentina e na Escócia, na perspectiva de suas concepções e significados. A metodologia empregada é a análise de políticas, com enfoque nos contextos políticos e ideológicos em que essas políticas foram formuladas. Seus objetivos, concepções e argumentos que orientam a seleção de beneficiários e as condicionalidades são analisados e comparados. Nos três países, os PTCR tornaram-se a principal estratégia para enfrentar a pobreza em contexto de austeridade fiscal. Na Argentina e no Brasil, com déficits históricos de acesso a direitos sociais, os programas conseguiram diminuir os piores índices de pobreza de renda e expandir a inclusão social por meio das condicionalidades em saúde e educação. Significaram um movimento de enfrentamento das desigualdades mesmo sem mudanças nas condições estruturais que as sustentam. Na Escócia, o Universal Credit rompeu com a concepção universalista do Welfare, de atender às necessidades básicas das pessoas, uma retração da assistência social, com uma lógica punitiva voltada para mudanças comportamentais dos mais pobres, com efeitos negativos especialmente sobre as populações mais vulneráveis.

PALAVRAS-CHAVE Política social. Proteção social. Brasil. Argentina. Escócia.

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Introduction

This article compares three Conditional Cash Transfer Programmes (CCTPs): the Family Allowance Programme (Programa Bolsa Família, PBF), the Universal Child Allowance (Asignación Universal por Hijo, AUH) and Universal Credit (UC) in, respectively, Brazil, Argentina and Scotland. These programmes form part of social protection systems built up over the course of the twentieth century and, since the 1990s, have been navigating contexts of fiscal austerity and reform and the resulting impacts on their policies for combating situations of poverty and vulnerability. The three countries have made CCTPs their primary means for addressing poverty. These programmes are compared here as regards their normative principles (values and conceptions) and how they specify the conditionalities placed on beneficiaries, which are seen as means of surmounting the condition of poverty. The comparison of the three countries examines this convergence on the CCTP strategy, in different social protection systems, as innovating or reshaping those systems, even though with different meanings in the Latin American and European context.

In the first section, the study methodology is described. The second discusses the conceptions of poverty and vulnerability underlying the CCTPs. The third section considers the political and ideological contexts in which these policies were formulated and which influenced their underlying conceptions. The fourth section sets out the characteristics of the CCTPs in the three countries, including their eligibility criteria and the conditionalities required of beneficiaries. The fifth section presents a comparative analysis of convergences and divergences. A final section offers some concluding remarks.

Material and methods

Different approaches and methods of the social sciences can be applied in analysing

components of public policies. The focus can be on, for example, the historical processes involved or the role of agents in producing certain specific outcomes, as in the case of the shaping of national social welfare states. Other studies have addressed the characteristics of the political and institutional framework in which the policies were formulated and implemented, as well as their outcomes^{1,2}, or the processes of the formulation and implementation of specific policies, their beneficiaries, objectives and impacts, as well as the instruments used³. Others have endeavoured to understand how similar problems are addressed and responded to in different national contexts⁴. Often the analysis is guided by a combination of one or more aspects of these approaches.

Public policy is exercised by way of actors and institutions in certain historical contexts; at the same time, it is strongly influenced by both values and interests⁵. The values and meanings underlying a policy can be understood from its stated rationale, because it is these arguments that direct its logic and objectives, as well as the characteristics of its measures and programmes⁶⁻⁹. The context is always important, particularly in comparative studies between countries, each with its unique historical experience.

Why choose these three countries? On the one hand, Argentina and Brazil, two Latin American countries have high rates of poverty and socially segmented protection systems with limited coverage and access; Scotland, on the other hand, is a member nation of the United Kingdom, whose social protection system was established in the post-war years, then underwent a near liberal reform in the 1990s, which had adverse impact on the poorest segments of society. In all three countries, the CCTPs introduced in the first decade of the twenty-first century stand as a pillar of their policies to combat poverty.

Cash transfer problems are no novelty as components of social protection systems in countries with mature welfare states, but have been redesigned as key strategies in

austerity policy-related reform processes¹⁰. As poverty increased in the late twentieth century, programmes of this type, promoted by multilateral organisations and banks, such as the World Bank and the Inter-American Development Bank, began to be spread to a number of emerging countries, among them, those of Latin America. With local variations, they became the main instruments of policies to combat poverty. These policies in Brazil, Argentina and Scotland are compared here in an endeavour to understand the meaning of the convergence on this strategy in contexts with differing historical trajectories and as part of innovations and the restructuring of social protection systems.

The conceptions of vulnerability and poverty implicit or explicit in these policies are discussed on the basis of a survey of qualitative evidence from secondary sources, such as laws, decrees, administrative orders and documents of governments and multilateral organisations, which express the arguments and conceptions of the programmes studied here. This material is in the public domain and available on Internet sites and was examined in the light of the national and international normative and political contexts that guided the production of policies to combat poverty and vulnerabilities.

Vulnerability and poverty

Vulnerability may be defined as the inability of a person or segment of the population to deal with risks^{11,12}. It also means exposure to various types of risk, such as violence, crime, natural catastrophes, diseases, exclusion from school, market shocks, pollution and numerous others^{13,14}. It refers as well to economic, social, environmental, psychosocial, legal, political, cultural, and demographic problems, as well as the effects of natural disasters, physical and mental health and so on.

In the social field, the idea of vulnerability developed from the conception of poverty as

related to income insufficiency, which has dominated social and economic studies and discussions ever since Rowntree, in the late nineteenth century, defined the notion of a minimal level of subsistence, covering food, fuel, housing, clothing, domestic and personal utensils and drawn from empirical research in the city of York in the United Kingdom^{15,16}. After World War II, by constructing social protection systems based on people's connection with work, social welfare States guaranteed access to the universal rights to education, health, employment, housing, retirement benefit, pensions and unemployment benefit. This system based on socialising social risks, on the principle of solidarity¹⁰, reduced social insecurity by offering a collective response in solidarity.

From the 1970s onwards, the crisis in capitalism and social welfare states, with decolonisation and the emergence of new social movements and actors, poverty began to be seen as multidimensional, deriving not just from income deprivation, but also from discrimination based on gender, colour, ethnicity and sexual orientation. The unequal distribution of resources, rights, opportunities and other assets among the various segments of a society is what defines social inequality, which also came to be associated with various forms of oppression and discrimination, in addition to income deprivation.

The neoliberal reforms of the 1980s, which centred on fiscal austerity and reducing the role of the State in welfare provision, dominated the international agenda, with the support of multilateral organisations. New proposals were required to combat mounting poverty on a global scale – and these were promoted by the same organisations, which now came to recommend, together with privatisation strategies, policies for inclusive economic growth and equity in democratic contexts¹³. Retrenchment and the fragmentation of classic universalist policies brought proposals for 'protection networks' and 'social risk management' focused on the most vulnerable^{14,17},

alongside other policies that went on to incorporate social demands, e.g., for healthcare and education, as well as those associated with identity, including nationality, ethnicity, race, gender and sexuality.

In the midst of this proliferation of increasingly global proposals for development, the work of Amartya Sen underpinned new multidimensional, multisector strategies for combating poverty and vulnerability in such a way as to achieve greater inclusion and equity¹⁸. His ‘theory of capabilities’ argued that development depended on the capabilities people developed for attaining quality of life, which in turn developed from economic, opportunities, political liberties, social powers and other empowering conditions, such as ‘good health, nutrition and basic education’¹⁸. Poverty came to be regarded as individuals’ being deprived of basic capabilities, those that enable them to enjoy the same life opportunities. It can also mean being powerless and voiceless, vulnerable and fearful, all of which limit individual functioning. Development, then, would entail combating the main sources of deprivation of freedom: poverty and tyranny, lack of economic opportunity and systematic destitution, negligence by public services, intolerance and so on.

The ‘theory of capabilities’ was an important argument and normative basis for the new strategies promoted by the multilateral banks – particularly, but not exclusively, in Latin America – in which CCTPs were intended to interrupt the transgenerational reproduction of poverty and vulnerability. In Brazil, Argentina and other Latin American countries, such as Mexico and Chile, these targeted policies, singly or in combination with other universal policies, became the flagship strategy for combating poverty and vulnerability. The ‘theory of capabilities’ also influenced the formulation of multidimensional development indicators, including the Human Development Index, which the United Nations used as a global parameter for assessing its member countries and, later, the 2030 Agenda goals.

All these measures rest, with variations, on the multidimensional interrelation between poverty and types of vulnerability.

In more advanced European countries, more connected with the ‘theory of capabilities’, what is known as the ‘social investment’ paradigm, focusing on human capital, gained space in public policies for the most vulnerable. Given the context of recession in global capitalism and cutbacks in social spending in a number of countries, this approach gained momentum from the 2000s onwards. It was advocated as an alternative to neoliberalism and the pro-market reforms that had dominated since the 1990s, which were called increasingly into question for their inability to respond to the economic crisis and bring social justice¹⁹. It has been widely proposed by the Organisation for Economic Cooperation and Development and has underpinned policies formulated by the European Commission, which in 2013 launched the Social Investment Package: Towards Social Investment for Growth and Cohesion²⁰.

Its main aims – unlike compensatory, damage-repair policies – consist in building individual’s capabilities over the course of their lives, from early childhood, and investing in quality education and childcare so as to prepare individuals to face social risks. Although conspicuously heterogeneous, this theory proposes to support disadvantaged social groups towards success on the labour market and to reduce gender inequities by work-life balance policies and provision of high-quality childcare services, thus promoting equal opportunities²¹.

Hemerijck¹⁹ argued that social investment would prepare individuals and families to create their own life opportunities and deal with disruptive events by providing for the risks resulting from them. These policies should be anchored in three central, complementary and interdependent functions: a) facilitating lifecycle transitions to raise levels of labour participation, reduce school dropout rates, help the long-term unemployed and

foster home-work balance; b) increasing the stock of human capital and the population's competences by way of education, vocational training and capacity-building and care from childhood; and c) maintaining a strong universal minimum-income security network as social protection and an economic stabilisation buffer in aging societies, so as to help reduce social inequalities.

Although this perspective claims to differ from neoliberal approaches, because it calls for the State to take an active role in guaranteeing social protection, critics such as Laruffa²¹ have drawn attention to its insufficiencies in breaking with neoliberalism. His argument is that a political paradigm is not defined only by the political instruments it deploys, but primarily by its values and normative principles. In that respect, he regarded social investment as falling into utilitarianism and a naturalisation of the economic thinking inherent to neoliberalism by applying market principles universally to non-economic issues. The emphasis on material prosperity and maximising economic growth is given priority over other values, nurturing a subjectivity based on the neoliberal idea set of *homo economicus*, in which individuals are actors endowed with rationality to maximise their interests, enterprising in spirit and to be governed by means of incentives that manipulate their behaviour.

Behaviour modification was to be the main aim of 'activation' strategies, which called for beneficiaries to take an active role in seeking entry into the labour market in exchange for receiving a social benefit¹⁰. Rather than *welfare*, Peck²² gave the name *workfare* to the forms of activation that dominated social protection reform in the United States after the late 1960s. A number of European countries introduced these, with differing designs, in their social protection reforms of the following decades.

'New' risks emerged in association with the poverty and vulnerability produced by the changes of the twenty-first century, including technological advances, increased long-term

unemployment and widespread precarious and discontinuous occupation, the development of a highly competitive knowledge economy, population ageing, women's entry into the labour market and the economic and fiscal unsustainability of social welfare states. In this scenario of insecurities and worsening social risk, the appearance of new factors of unpredictability reduced the response capacity of governments and social protection institutions²³. Vandenbroucke wrote that "social policy should contribute to actively mobilising the productive potential of citizens in order to mitigate new social risks"²⁴⁽⁸⁾ and is thus seen as investment, for both its social and economic outcomes.

National contexts and CCTPs

In Latin America, CCTPs were introduced in the late 1990s and early 2000s in countries governed by reformist and/or left-wing coalitions, in a conjuncture of profound economic crisis that brought the expansionist post-World War II period to an end. Brazil and Argentina had gone through long periods of military dictatorship and political transitions involving large-scale social mobilisation. The democratic gains were ratified constitutionally in 1988 in Brazil and in 1994 in Argentina. Over the following 10 years, CCTPs were introduced on a national scale in Brazil in 2004, by the first Lula government and, in Argentina in 2009, by the government of Cristina Kirchner. These programmes were agreeable to the democratic context and proposals for combating poverty and promoting inclusion of the poorest, but without altering the productive structure, which had the support of the multilateral banks, particularly the World Bank and the Inter-American Development Bank.

In the United Kingdom, after the recession of 2008, the conservative coalition government led by prime minister David Cameron implemented an austerity programme designed

to reduce the public deficit by cutting back local government budgets and social assistance spending. Although Scotland – thanks to its greater autonomy from the central government afforded since the devolution of powers in 1999 – did not quite follow the same trajectory of neoliberal reforms as the United Kingdom, it did also introduce various reforms into its protection system. These differed significantly from the programmes of Argentina and Brazil, which responded to these countries' very different contexts.

In Brazil, the Family Allowance Programme (PBF) was set up in 2003 during the first Lula government²⁵, unifying the cash transfer programmes of the preceding Fernando Henrique Cardoso administration. The programme lasted 18 years, through a number of presidential mandates, until it was replaced in November 2021, during the Bolsonaro government, by the Brazil Assistance Programme (Programa Auxílio Brasil, PAB). When Lula was re-elected president in 2022, the PBF was offered once again with some modifications.

The main objective of the PBF was to combat hunger and extreme poverty and help emancipate poor families by three interrelated lines of action: a) direct cash transfers to the families to alleviate poverty immediately; b) fulfilment of health and education conditionalities requiring antenatal care and monitoring of the children's nutritional status, compliance with the vaccination calendar and school attendance, understood as the beneficiaries' counterpart contributions to guarantee that they accessed basic social services and as a strategy to break with the intergenerational cycle of poverty; and c) complementary programmes directed to productive inclusion and job and income generation²⁶. Other complementary measures included a social electricity tariff, literacy classes, youth and young adult education and vocational training, and improved housing conditions, as well as exemption from federal civil service examination fees²⁷.

Although resting on the understanding of poverty as a multidimensional and multidetermined phenomenon, the PBF applies

monetary income as its main eligibility criterion. Beneficiaries must be entered on the federal government's Unified Register for Social Programmes (Cadastro Único para Programas Sociais, CadÚnico), a national information system that identifies and records the socioeconomic particulars of low-income families. There is also a ceiling on the number of beneficiaries per municipality, based on an estimate of the number of vulnerable local families and the limitations of the programme budget.

Management of the PBF follows the decentralised model of several other of Brazil's federal policies. The programme is funded by the Ministry for Development and Social Assistance, the Family and Combating Hunger (Ministério do Desenvolvimento e Assistência Social, Família e Combate à Fome, MDS), which coordinates programme execution and transfer of funds to the states and municipalities and deposits benefit amounts directly through the Caixa Econômica Federal, a public savings bank with strong capillarity in Brazil.

Municipalities are responsible for registering families on the CadÚnico, monitoring compliance with conditionalities and enrolling families in social services. It is up to the states to provide technical support, capacity building for municipal civil servants, support for the inclusion of traditional and specific populations in the CadÚnico and monitoring of education conditionalities in the state school system, as well as interconnecting the programme with other measures operated by the state government.

The PBF also provides for interlinking among measures in the fields of education, health care, social assistance, food security, child and adolescent care and so on^{27,28}. Social oversight of the programme is provided by social oversight bodies in the municipalities and states and there is an inter-sector PBF management committee at each level of government to plan inter-sector activities, such as monitoring the fulfilment of conditionalities, family care and the measures necessary for management of the CadÚnico.

Programme benefits may be cancelled in the event the family is responsible for five successive compliance failures. However, when families fail to meet conditionalities, the punitive measures are applied only in extreme cases. In 2009, for example, an instruction from the MDS stipulated that monitoring should be interrupted if families failed to meet conditionalities²⁹, precisely because it was the most vulnerable families that were unable to comply and needed greater support.

Until its replacement by the PAB in November 2021, PBF amounts received by beneficiaries varied depending on the information provided at registration, such as: family size and composition, housing conditions, level of schooling, age range, total and per capita family income and so on. Each family could receive up to five variable benefits in all. In addition to these, there is an Extreme Poverty Relief Benefit (Benefício de Superação da Extrema Pobreza, BSP) to top up the per capita income of families that, even after receiving these variable amounts, fail to rise above the extreme poverty line per person.

Resumption of the PBF in 2023 brought some alterations to the programme's previous format, among them, higher benefit amounts and the addition of other amounts depending on the family member's individual situation (e.g., pregnant women, children, adolescents, nursing mothers). In 2024, Brazil's population was a little over 203 million. In February of that year, the CadÚnico database comprised 95,926,760 individuals and 41,636,739 families. Of the former, 50,614,514 were in situations of extreme poverty and 22,321,579 were low-income. That same month, the PBF benefited 55,272,466 individuals and 21,066,533 families³⁰.

Studies have shown the programme's role in reducing poverty and inequality since it was implemented: it was responsible for 10% of the reduction in inequality between 2001 and 2015. In 2017, PBF benefit payments lifted 3.4 million people out of extreme poverty and another 3.2 million from poverty³¹. A study

with 2023 CadÚnico data showed that 43% of the heads of families with children from 0 to 6 years old had no fixed source of income and, for 83% of them, the family allowance was the main source; the PBF was found to have reduced by 91.7% the percentage of children in early childhood living in families in conditions of poverty or extreme poverty³².

In Argentina, the Universal Child Allowance (AUH) programme was set up by presidential decree by Cristina Kirchner in November 2009. As with the PBF, its broader aim was to deter the intergenerational transmission of poverty by developing human capabilities in the most vulnerable families. The programme provides direct cash transfers on the condition that the health care and vaccination requirements of children up to 4 years of age are met and that, from 5 to 18 years of age, young people attend all levels and forms of compulsory education³³.

Argentina is a federal country whose government is divided into two autonomous levels, one distributed in 23 provinces, plus the federal capital (the Autonomous City of Buenos Aires), and the other, the federal government. The National Constitution reformed in 1994 attributed wide-ranging prerogatives to the provinces as regards public policy administration in health care, education, infrastructure and security. It is also their prerogative to set parameters on the autonomy of the municipalities in their jurisdictions.

However, the AUH is a national programme and its rules are laid down by the national government, which alone is responsible for managing it through the National Social Security Administration (Administración Nacional de la Seguridad Social, ANSES) and its Decentralised Comprehensive Care Units (Unidades de Atención Integral Descentralizadas, UDAIs). The management structure consists of an Advisory Committee, an Interministerial Council comprising the ANSES, the Ministry of Labour, Employment and Social Security and the Ministry of Health, Education and Home Affairs³⁴; there is no direct participation by the provinces. The

ANSES drafts complementary regulations for the programme's implementation, supervision and benefit payments³³.

In June 2024, Argentina had a population of 47,067,641. During the first quarter of that year, poverty claimed 55.5% of the population and extreme poverty, 17.5%. More than half the population lived on the poverty line and nearly one fifth could not meet basic food needs³⁵.

Of social policies directed primarily to children in Argentina, the AUH has broadest reach: in February 2024, it benefited four million children and adolescents nationwide. At that time, some 2.3 million families were claiming the benefit³⁶.

Argentina's Social Debt Observatory³⁷ found that the AUH reduced the incidence of poverty by 13.2% from 2010 to 2013; by 11.9% from 2014 to 2017; and by 4.5% from 2018 to 2020. Among beneficiary children and adolescents, it cut extreme poverty by nearly 50% in each of the three periods observed. It also had important impact on the intensity of material deprivations, reducing poverty-related inequality by about 20% and extreme poverty-related inequality by 30% to 40%.

Benefit claims are made at local ANSES offices by the person responsible for the family group in person or by the Internet and benefit payments are deposited in a bank account in the name of a parent, tutor, guardian or blood relative up to the third degree. Benefits are paid monthly, 80% directly and 20% deposited in a savings account in the benefit holder's name at the Banco Nación, which can be withdrawn at the end of each year after compliance with the conditionalities is demonstrated in their National Social Security, Health and Education Booklet, the main document recording compliance with the programme's conditionalities, under UDAI supervision. Sanctions for non-compliance with conditionalities range from retention of 20% of the benefit amount saved during the prior year to exclusion from the programme. Since the COVID-19 pandemic, however, application of sanctions has been suspended. Failure to

present the booklet means beneficiaries cannot receive the complementary school and food allowances, because these are claimed by presenting the booklet³³.

The AUH can be complemented by several other social programmes, which generally increase the amounts received by families in situations of greater vulnerability and poverty, particularly those with children and pregnant women. There are also programmes for young people in lower secondary, upper secondary or higher education and others that offer vocational training or support for older adults.

In Scotland, as in the other nations of the United Kingdom, the Universal Credit (UC) was approved, for persons of working age, in the 2012 Welfare Reform Act, part of the Cameron government's reform of the social security system. That reform modified the social protection system: for typical social assistance benefits, it adopted the activation and social investment approach. Among the various aims of the reform were to simplify the benefit payment system by replacing the existing six benefits and tax credits by one single payment, to encourage beneficiaries' financial responsibility, reduce their dependence on the welfare system and enable them to enter the job market as a way to escape poverty and to encourage the transition to employment³⁸.

The main measurement used to specify poverty for the UC is income less housing costs. In 2022, the population of Scotland was estimated at 5.72 million, 21% of which lived in conditions of poverty³⁹. However, although there were 1.11 million people in that situation in October 2023, only 501,457 were receiving UC benefits, that is, less than half the poor in the population.

The benefit, intended for persons of working age, is available to individuals with little income or in need of assistance with their living expenses, excluding those who have reached retirement age of 66 years. The benefit may be claimed by the unemployed, workers and persons unable to work for health reasons. Beneficiaries must live in the United Kingdom,

be over 18 years of age (except in special cases) and own at most £16,000 in money, savings and investments. Beneficiaries are automatically eligible for other benefits, such as free school meals for children, free legal aid, subsidies for young people to continue at school, National Health Service benefits and others⁴⁰.

Benefit amounts, based on income, assets, number of children and family situation, are issued in single monthly payments designed to imitate wage payments. In Scotland, the flexibility afforded by the 'Scottish Choices' allows beneficiaries to receive payments twice a month and/or have their housing allowance paid directly to their landlord⁴¹. The idea of transferring rent amounts to beneficiaries is to encourage their financial responsibility and control of their finances, but many are unable to distribute these funds over the course of a month or end up using this money for other expenses, thus failing to pay their rent⁴².

Management of the benefit in the United Kingdom is centralised at the Department of Work and Pensions. The policy combines conditionalities with sanctions. The conditions for receiving the benefit are adapted individually by what are known as 'workcoaches', who can establish autonomously, for example, how many hours should be devoted to job seeking, employment interviews and so on, whether applicants are working enough hours or whether they meet the criteria to receive the UC. They can also impose sanctions if conditionalities are not met³⁹. Punitive measures may include the benefit being cut totally or partially, depending on the agreement reached. The conditions include appearing at scheduled meetings, the work coach's assessment of the situation and the faithfulness of information provided, both at registration and as regards any change in circumstances.

The requirement of compulsory participation in programmes, most directed to job

placement, is intended to produce behavioural change. Koch & Reeves⁴³ referred to this shift in the attitude to social security as 'State-sanctioned social insecurity', instilled by means of successive waves of reform which, with implementation of the UC, have become increasingly punitive in nature, leaving the most vulnerable population groups increasingly fragile by the rigidity of the conditionalities and penalties they impose.

Since 2015, when the UC was introduced, the number of people living on the street in Scotland has increased⁴¹. Vulnerable groups have been the most affected by the sanctions, which have had severe effects on mental health, rising suicide rates, particularly among the unemployed transferred to the UC⁴⁴, robberies and minor crimes by young beneficiaries unable to adjust to the rules of the programme⁴².

Social protection systems in the United Kingdom have come to be framed by access restrictions. Even though Scotland takes a more inclusive approach – since devolution of powers and investiture of the Scottish parliament in 1999, it has carried out a number of reforms, which distinguish its social policies and social protection culture from others in the United Kingdom – it has not obtained the expected beneficial effects and its poverty rates have followed trends similar to those of the rest of the United Kingdom⁴⁵. The mercantilist and job-directed nature of the UC has proven ineffective in reducing poverty and vulnerability and has not managed to alter structural conditions resulting from changes in labour relations.

Comparative analysis

Table 1 (below) summarises some data on the three programmes.

Table 1. Main characteristics of the programmes studied.

Dimension	Brazil – Programa Bolsa Família (PBF)	Argentina – Asignación Universal por Hijo (AUH)	Scotland – Universal Credit (UC)
Political context of implementation	Policies to combat poverty in left-centre government with support of multilateral organisations.	Policies to combat poverty in left-centre government with support of multilateral organisations.	Neoliberal reforms following recession of 2008; focus on austerity.
Objectives	To combat hunger and extreme poverty, interrupt inter-generational poverty; promote access to rights to health and education.	To combat hunger and extreme poverty, interrupt inter-generational poverty; promote access to rights to health and education.	Encourage financial responsibility and entry into the labour market (activation).
Eligibility criteria	Family income.	Income, informal employment, domestics, under-age children.	Financial assets (cash, savings and investments).
Target public	Families with monthly per capita family income of up to R\$218.00 (US\$38.41).	Unemployed parents or guardians of children under 18 or persons with disability, informal workers and domestics. Monthly income less than AR\$3,599,466 (US\$36.69).	Persons over 18 years of age, able to work, not retired, who own at most £16,000 (US\$20,798.40) in cash, savings and investments.
Conditionalities to receive the benefits	Health and education controls (antenatal, vaccination, school attendance).	Health and education controls (antenatal, vaccination, school attendance).	Engagement in vocational training and job-seeking activities.
Penalties/sanctions	Cancellation if family is responsible for 5 successive instances of non-compliance.	Payment of only 80% of the benefit pending proof of compliance with conditionalities.	Benefit cut wholly or partly in event of non-compliance with conditionality.
Beneficiary public	Approximately 55 million families (94% of poor in the population).	About 2.3 million families in 2024 (10% of poor in the population).	About 433,000 households in 2024 (40% of poor in the population).
Effect on combating poverty	Positive.	Positive.	Negative.

Source: Prepared by the authors.

The three countries introduced reforms to social protection following the Washington consensus, under an umbrella of austerity, at the same time as the ‘theory of capabilities’ sounded the alarm on using the criterion of monetary income as the sole parameter for thinking about development and combating poverty and vulnerability. In Argentina and Brazil, with their historical deficits in access to social rights and democracy, their situations of acute social and economic crisis and social protection systems to which access is fragmented and unequal, the introduction of CCTPs – even though these were not written into constitutions and originated from the same liberal mould promoted by the multilateral organisations – managed to expand social

inclusion. They did this by having poverty relief incorporate not just the market, but access to the rights to health and education by way of their conditionalities and complementary measures. They represented a move towards addressing inequalities, albeit without changing the underlying structural conditions.

Meanwhile, the labour market-related notions of social investment and activation entailed a logic directed to behavioural change among the poorest and most vulnerable. Public policy thus performs the function of turning them into active workers by their compulsory participation in activities that integrate them with the labour market, while subjecting them to sanctions by the State bureaucracy in cases

of non-compliance. In Scotland, as in the rest of the United Kingdom, the UC reflected a radical change in social protection values, a retraction of social assistance at a time of employment crisis and changing labour relations. It broke with the traditional conception of welfare, of meeting people's basic needs from a sense of solidarity and universal rights. Targeting, restrictions on access and the excessive regulation imposed by the programme undermined its own conception of social investment in that, on the one hand, they held individuals responsible for their risks and, on the other, restricted their options and left them increasingly liable to criminalisation. Thus framed, in a context of generalised 'restriction', the idea of 'investment' holds little promise.

The conditionalities of the UC had adverse impact, especially on vulnerable populations. A United Nations report signalled a series of problems not just in the programme's design, but in its implementation: payments were constantly delayed, to say nothing of the harmful impacts on ethnic minorities, women, children, people with disability and low-income families⁴⁶.

While, in the case of Scotland, the UC imposed restrictions on access to rights, in the cases of Brazil and Argentina, the PBF and the AUH managed to improve the worst indices of income poverty and expand access to the rights to health and education, even though patterns of inequality are a long way from being changed without more in-depth economic reforms and improvements to public health and education services.

Final remarks

The expansion of CCTPs since the 1990s, as a strategy for combating poverty, is associated with the severe economic crisis affecting the capitalist countries, which brought an end to the expansionist period experienced after World War II. In an increasingly financialised

economy, technological innovations and changes in the productive sphere resulted in increasing, and now strictly structural, unemployment and precarious labour relations. These, combined with the retrenchment measures that guided reform of social protection systems, contributed to worsening levels of poverty and social inequalities on a world scale. It fell to social protection policies – with important variations in the designs, normative principles and values that sustained them – to contain the harmful outcomes of this process, but without changing it.

The United Kingdom developed its protection system at a time of full employment, when social assistance played a secondary role alongside social insurance, and particularly health, policies. The reforms reversed that logic, introducing an approach based on rationalising expenses, which actually meant reducing public funding, privatising and restricting access. In that context, predominated by new, more tenuous labour relations and precarious employment, social assistance figured prominently on the government's agenda and gained new institutionalality, but obeyed the liberal approach based on austerity principles. There, reform introduced the dimensions of cost containment, recommodification, and recalibration noted by Pierson⁴⁷ to characterise the context of permanent austerity.

In the cases of Argentina and Brazil, austerity encountered more fragile systems, especially those of Brazil, which had been expanding, in fact, since 1988. CCTPs were introduced not so much to assist policies designed to contain and regulate the workforce (which would be impossible in the context of widespread informality, scarce employment and high vulnerability), but as compensatory arrangements set up by progressive governments, which gave due value to inclusion and notions of greater solidarity and comprehensiveness.

The programmes did nothing to alter the trajectory of austerity in these countries. On the contrary, to some extent they masked its medium- and long-term effects. In any

case, although a highly innovative option for conditions in these countries, CCTPs have now demonstrated that they are outdated as mechanisms for combating poverty and vulnerabilities. Increasing longevity and the worsening structural conditions imposed by austerity affect the whole array of social policies, for health, labour, housing and so on, which are left to find effective means to combat inequalities.

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Received on 11/13/2024

Approved on 04/06/2025

Conflict of interest: non-existent

Financial support: CNPq, project 'Pobreza e políticas de assistência social no Brasil, Argentina e Escócia: um estudo comparado' ('Poverty and social assistance policies in Brazil, Argentina and Scotland: A comparative study')

Editor in charge: Jamilli Silva Santos